

REVISED AND UPDATED FINAL  
ENVIRONMENTAL IMPACT REPORT

SCH # 2023050241

**NORMANDIE CROSSING  
SPECIFIC PLAN PROJECT**

---

**LEAD AGENCY**



**CITY OF GARDENA**

Greg Tsujiuchi - Community Development Director  
Amanda Acuna – Community Development Manager  
Community Development Department  
1700 West 162<sup>nd</sup> Street  
Gardena, California 90247  
310.217.9593

**APPLICANT**



**CONSULTANT**



**KIMLEY-HORN AND ASSOCIATES, INC.**

Rita Garcia – Project Manager  
1100 W Town and Country Road, Suite 700  
Orange, California 92868  
714.786.6116

**NOVEMBER 2024**



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## 1.0 INTRODUCTION

### 1.1. PUBLIC REVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

In accordance with State California Environmental Quality Act (CEQA) Guidelines §§ 15120 through 15132, the City of Gardena prepared a Draft EIR (DEIR) for the Normandie Crossing Specific Plan Project (SCH No. 2023050241). The DEIR was made available for review and comment to the public, responsible and trustee agencies, interested groups, and organizations for a 45-day period that occurred between December 4, 2023 and January 20, 2024. The DEIR was also made available directly to State agencies through the State Clearinghouse, Office of Planning and Research.

The Project was heard before the Planning Commission at the March 19, 2024, public hearing. As a result of input received from the community through the public hearing and public review processes, as well as from a follow-up meeting the Applicant had with neighborhood residents following the Planning Commission hearing, the Applicant proposed plans for a revised project which is now included as the Community Input Alternative. This new Alternative addresses the following primary concerns that were raised by the community and neighborhood residents: density; and apartment building height and mass, parking and the alignment of the driveway on 170<sup>th</sup> Street. This revised and Updated Final Environmental Impact Report (FEIR) includes the Community Input Alternative in addition to responses to comments received after the public comment period closed on January 20, 2024.

### 1.2. FINAL ENVIRONMENTAL IMPACT REPORT

Before approving a project, CEQA requires that the Lead Agency prepare and certify an FEIR. The contents of a FEIR are specified in State CEQA Guidelines § 15132, as follows:

- (a) *The draft EIR or a revision of the draft.*
- (b) *Comments and recommendations received on the draft EIR either verbatim or in summary.*
- (c) *A list of persons, organizations, and public agencies commenting on the draft EIR.*
- (d) *The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) *Any other information added by the Lead Agency.*

The FEIR allows the public and Lead Agency an opportunity to review DEIR revisions, the comments and responses, and other EIR components, such as the Mitigation Monitoring and Reporting Program (MMRP) before Project approval. The FEIR serves as the environmental



document to support a decision on the proposed Project. This FEIR document consists of the following components:

- **Section 1.0: Introduction,**
- **Section 2.0: Comment Letters and Responses,**
- **Section 3.0: Errata to the DEIR, and**
- **Section 4.0: Mitigation Monitoring and Reporting Program.**

It is noted, none of the corrections/clarifications identified in this FEIR constitute “significant new information” pursuant to State CEQA Guidelines § 15088.5. The new information added merely clarifies/amplifies and makes insignificant modifications to the DEIR. The corrections/clarifications do not involve changes in the Project or significant new information. They do not result in a new impact or substantial increase in the severity of an environmental impact identified in the DEIR. No new or substantially different mitigation measures than those identified in the DEIR are required. Moreover, the new information does not affect the DEIR’s overall conclusions. Therefore, recirculation of the DEIR is not warranted.

Pursuant to State CEQA Guidelines § 15090, prior to approving a project, the Lead Agency must certify that:

1. *The Final EIR has been completed in compliance with CEQA;*
2. *The Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the Project; and*
3. *The Final EIR reflects the Lead Agency’s independent judgment and analysis.*

These certifications, or “Findings of Fact,” are not part of the FEIR, but can be found in the Resolution certifying the EIR. Both the FEIR and the Findings will be submitted to the Lead Agency for consideration of the proposed Project.



## 2.0 COMMENT LETTERS AND RESPONSES

### 2.1 LISTS OF PUBLIC AGENCIES, PERSONS, AND ORGANIZATIONS COMMENTING ON THE DEIR

In accordance with State CEQA Guidelines § 15132, the public agencies, and persons and organizations commenting on the DEIR are listed below in **Table 2-1: List of Commenting Public Agencies and Persons and Organizations**. As indicated in **Table 2-1**, comments on the DEIR were received from three public agencies, one organization, and three residents.

**Table 2-1: List of Commenting Public Agencies And Persons And Organizations**

No.	Date	Author	Author Title	Agency/Organization
<b>Public Agencies</b>				
A1	01/04/24	Ronald M. Durbin	Chief, Forestry Division, Prevention Services Bureau	County of Los Angeles Fire Department
A2	01/17/24	Frances Duong	Acting LDR/CEQA Branch Chief	State of California Department of Transportation District 7
A3	01/23/24	Curtis M. Welty, PG	Associate Oil and Gas Engineer	State of California Department of Conservation Geologic Energy Management Division
<b>Persons and Organizations</b>				
A4	01/19/24	Stephanie Papayanis	Attorney	Western States Regional Council of Carpenters
A5	02/25/24	Tish McCauley	Resident	N/A
A6	02/18/24	Keren Hwang	Resident	N/A
A7	02/01/24	Kevin Collier	Resident	N/A
A8	03/13/24	Donnetta Jalomo	Resident	N/A
A9	03/04/24	Kevin Collier	Resident	N/A
A10	3/18/24	Mitchell M. Tsai	Attorney	Western States Regional Council of Carpenters
A11	03/19/24	Brenda Rodriguez	Resident	N/A
A12	03/19/24	Dalia R. Juarez	Resident	N/A
A13	03/19/24	Terri C.	Resident	N/A
A14	03/19/24	Yvonne & Arthur Acosta	Residents	N/A
A15	03/19/24	Ace Rose	Resident	N/A



**Table 2-1: List of Commenting Public Agencies And Persons And Organizations**

No.	Date	Author	Author Title	Agency/Organization
A16	03/20/24	Brandon Smith	Residents	N/A
A17	03/20/24	Gloria Mazzocco	Homeowner	N/A
A18	03/20/24	Liliana Arreguin	Resident	N/A
A19	04/02/24	Various	Residents	N/A
A20	03/19/24	Layne Fajeau	Attorney	Supporters Alliance for Environmental Responsibility
A21	03/27/24	Bryan Flynn	Attorney	Supporters Alliance for Environmental Responsibility
A22	10/23/24	Note to File	N/A	N/A

## 2.2 COMMENT LETTERS AND RESPONSES

In compliance with State CEQA Guidelines § 15132, this Section includes all comments received on the DEIR, along with the City of Gardena’s responses to significant environmental points raised by those comments. The comments are grouped according to author (i.e., Public Agencies and Persons and Organizations). Each individual comment letter listed in **Table 2-1** is reproduced on the following pages. Each letter and the individual comments in each letter have been consecutively numbered for ease of reference. Following each comment letter, a response is provided for each comment raising substantive environmental issues. The responses are numbered and correlated to the bracketed and identified portions of each comment letter.

Responses may include text revisions to clarify or amplify information in the DEIR, as a result of environmental points issues in the comments, or as requested by the Lead Agency. A response to a comment requiring DEIR revisions presents the relevant DEIR text in a box, with deleted text indicated by strike through and added text indicated by double underline, as follows:

~~Deleted DEIR text~~ Added DEIR text

DEIR text revisions are also presented in **FEIR Section 3.0: Errata to the Draft EIR**.



**Letter A1 – County of Los Angeles Fire Department**  
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**Comment Letter 1**



ANTHONY C. MARRONE  
FIRE CHIEF  
FORESTER & FIRE WARDEN  
*"Proud Protectors of Life,  
the Environment, and Property"*

**COUNTY OF LOS ANGELES  
FIRE DEPARTMENT**

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



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FIFTH DISTRICT

January 4, 2024

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

Dear Ms. Acuna:

**THE NOTICE OF PREPARATION, "THE NORMANDIE CROSSING SPECIFIC PLAN PROJECT", PROPOSES THE CONSTRUCTION AND OPERATION OF A RESIDENTIAL DEVELOPMENT COMPRISED OF 403 DWELLING UNITS. THE PROJECT CONSTRUCTS TWO SUBAREAS THAT INCLUDE AN APARTMENT PORTION AND A TOWNHOME PORTION CONNECTED BY INTERNAL STREETS, CITY OF GARDENA, FFER2023006487**

The Environmental Impact Report 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:**

Fire protection serving the area appears to be adequate for the existing development/land use; however, each additional development creates greater demands on existing resources.

**A1-1**

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

**LAND DEVELOPMENT UNIT:**

The proposed development was submitted for review and approval to the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit for review and approval of Vesting Tentative Tract Map 83922 (FLDU2023003466). At this time, there are outstanding corrections that shall be addressed prior to clearance of the Vesting Tentative Map. A submittal for a REQUEST FOR MODIFICATIONS OR ALTERNATIVE MATERIALS AND

**A1-2**

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

- |              |             |                  |                      |                      |                       |                  |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CARSON      | EL MONTE         | INGLEWOOD            | LAWDALE              | PICO RIVERA           | SIGNAL HILL      |
| ARTESIA      | CERRITOS    | GARDENA          | IRVINDALE            | LOMITA               | POMONA                | SOUTH EL MONTE   |
| AZUSA        | CLAREMONT   | GLENORA          | LA CANADA-FLINTRIDGE | LYNWOOD              | RANCHO PALOS VERDES   | SOUTH GATE       |
| BALDWIN PARK | COMMERCE    | HAWTHORN GARDENS | LA HABRA             | MALIBU               | ROLLING HILLS         | TEMPLE CITY      |
| BELL         | COWINA      | HAWTHORNE        | LA MIRADA            | MAYWOOD              | ROLLING HILLS ESTATES | VERNON           |
| BELL GARDENS | CUDAHY      | HERMOSA BEACH    | LA PUENTE            | NORWALK              | ROSEMEAD              | WALNUT           |
| BELLFLOWER   | DIAMOND BAR | HIDDEN HILLS     | LAKEWOOD             | PALMDALE             | SAN DIMAS             | WEST HOLLYWOOD   |
| BRADBURY     | DUARTE      | HUNTINGTON PARK  | LANCASTER            | PALOS VERDES ESTATES | SANTA CLARITA         | WESTLAKE VILLAGE |
| CALABASAS    |             | INDUSTRY         |                      | PARAMOUNT            |                       | WHITTIER         |



**Letter A1 – County of Los Angeles Fire Department**  
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Amanda Acuna  
January 4, 2024  
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METHODS REVIEW, was provided the the Land Development Unit Supervising FPEA on September 29, 2023. The proposed access widths as indicated in the Initial Study, Notice of Preparation and Normandie Crossing Specific Plan do not comply with the access requirements as noted in the County of Los Angeles Fire Code Chapter 5.

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

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.

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

A1-2

The proposed development shall comply with the following County of Los Angeles Fire Code Sections: 503.1, 503.1.1, 503.2.1, 503.2.1.2.2, 503.2.1.2.2.1, 503.2.1.2.2.2, 503.2.2.1, 503.2.4, 503.2.8, 503.2.9, 503.3, 503.4, 503.4.1, 503.6, 504.1, 503.3. Additional Fire Code requirements will apply at the County of Los Angeles Fire Department Fire Prevention Division Engineering Section Building Plan Check Unit review for building permit issuance

Every building constructed shall provide an adequate water supply for fire protection purposes. The fire hydrant spacing shall be 300 feet with a fire flow requirement of 4,000 gpm at 20 psi residual pressure for 4 hours. An approved fire sprinkler system in the proposed building in compliance with applicable codes and regulations will qualify for a fire flow reduction as outlined Table B105.1 of the County of Los Angeles Fire Code.

Required fire flow for private on-site fire hydrants, 2,500 gpm @ 20 psi for 2 hours.

See Site Plan Mark Updated 08/04/2023 for specific information regarding the requirement for 1 new public fire hydrant and 4 new private on-site fire hydrant(s).

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.

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





**Letter A1 – County of Los Angeles Fire Department**  
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**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. Potential impacts in these areas should be addressed

A1-3

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 has reviewed the draft EIR and associated environmental reports prepared by Partner Engineering and Science, Inc (Partner) and the associated Vapor Intrusion Risk Evaluation, dated August 11, 2023, prepared by Hillmann Consulting, LLC. In addition to the proposed mitigation measures included in the draft EIR, HHMD also recommends that a soil management plan (SMP) be implemented at the project site prior to site grading. The SMP should also address potential discoveries of underground storage tanks (USTs) and the associated role of the Los Angeles Regional Water Quality Control Board if contaminated soil and/or groundwater were to be associated with past UST releases. HHMD has no additional requirements or comments at this time.

A1-4

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

Very truly yours,

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

RMD:pg



## RESPONSE TO COMMENT LETTER NO. A1

Ronald M. Durbin, Chief, Forestry Division, Prevention Services Bureau  
County of Los Angeles Fire Department  
January 4, 2024

A1-1 This comment from the Planning Division states that the fire protection for the area appears to be adequate for existing development. This comment also notes that each development (including this Project) would increase the demand on existing resources.

As noted in **DEIR Section 4.11: Public Services**, the Project would result in population growth that would incrementally increase the demand for fire protection in the area. However, as the Project site is currently served by fire protection services and is in a suburban setting where fire protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered fire protection facilities to maintain fire service objectives. Therefore, impacts concerning fire protection would be less than significant. No further discussion is necessary.

A1-2 This comment provides the Land Development Unit's comments on the DEIR. The comment states that the Project development must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

As stated in **DEIR Section 4.11**, the Project would be constructed with fire safety features in compliance with applicable provisions of the adopted Los Angeles County Fire Code, ordinances, and standard conditions regarding fire prevention and suppression measures related to water improvement plans, fire hydrants, fire access, and water availability (DEIR Page 4.11-6). The Los Angeles County Fire Department (LACFD) Fire Prevention Division has reviewed the Project, including the Site Plan, and provided requirements regarding firefighter and fire truck access, water system, fire flow, fire hydrant type/location, building address numbers, etc., which would enhance the Project's fire protection. The comment notes that the corrections and comments provided to the Applicant have not changed. The Applicant is required to continue to work with Fire Prevention Engineering to satisfy all requirements issued during the Fire Prevention Engineering Section's Building Plan Check Review. It is noted, LACFD also reviewed the Project's NOP and provided Conditions of Approval, which the Project would be required to comply with. The comment also provides contact information for further communication. This comment does not address the DEIR's adequacy or raise a significant environmental issue.



- The Applicant had several meetings with LACFD to address its concerns and revised the Conceptual Site Plan. According to the Applicant, these plans have been reviewed and approved by the LACFD Fire Prevention Division. As such, no further response is necessary.
- A1-3 This comment provides the Forestry Division’s comments on the DEIR and details the Division’s responsibilities within the LACFD. The comment requests that potential impacts within their responsibilities be addressed. Watershed management and erosion control are discussed in **DEIR Section 4.7: Hydrology and Water Quality** and archeological and cultural resources are discussed in **DEIR Section 4.2: Cultural Resources**. Impacts concerning these resources are addressed and, where a potential impact would occur, mitigation is incorporated. Therefore, with mitigation incorporated, impacts concerning issues would be less than significant. Regarding impacts to oak trees, fire hazards, and endangered species, as discussed in **DEIR Section 7.0: Effects Found Not to be Significant**, there are no trees, fire hazards, or endangered species on or adjacent to the Project site. No further discussion is necessary.
- A1-4 This comment provides the Health Hazardous Materials Division’s comments on the DEIR and recommends that a soil management plant (SMP) be implemented at the Project site prior to grading as an additional mitigation measure. As discussed in **DEIR Section 4.6: Hazards and Hazardous Materials**, MM HAZ-1 requires a Construction Management Plan to be prepared prior to issuance of demolition permits which would address potential undocumented contaminated soil. MM HAZ-1 sufficiently addresses the Health Hazardous Materials Division’s request for a SMP. Thus, no modifications to MM HAZ-1 are required. No further discussion is necessary.



**Letter A2 – State of California Department of Transportation District 7  
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**Comment Letter 2**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 289-1124  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life*

January 17, 2024

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

RE: Normandie Crossing Specific Plan Project  
SCH # 2023050241  
Vic. LA-405/PM 13.86, LA-110/PM 9.84,  
LA-91/PM 6.16  
GTS # LA-2023-04396-DEIR

Dear Amanda Acuna:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project proposes to remove all existing onsite structures (approximately 115,424 square feet (SF) of industrial uses) and, in their place, construct up to 403 multi-family DU, including 328 apartment units in one building and 75 townhomes in nine buildings. The apartment building would provide approximately 39,098 SF of private/public open spaces, 399 vehicle parking spaces, and 173 bicycle parking spaces. The townhomes would provide approximately 11,395 SF of open space, and 160 vehicle parking spaces (150 resident spaces in two-car garages and 10 guest spaces). Additionally, the Project proposes two offsite improvements: 266 linear feet of sidewalk improvements along 169th Street and various railroad track and roadway improvements along South Normandie Avenue.

A2-1

**Transit**  
The project site is situated within a quarter-mile of multiple bus stops and is accessible through transit service provided by the City of Gardena's Transit Service, Route 1X and Route 4 (GTrans).

A2-2

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



**Letter A2 – State of California Department of Transportation District 7**  
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January 17, 2024  
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**Pedestrian and Bicycle Facilities**

Existing sidewalks along the project frontage form part of a continuous pedestrian network, with a brief gap on the south side of 169th Street. Sidewalks are absent on Brighton Way, a public alley. Marked crosswalks and pedestrian facilities are available at signalized intersections along Normandie Avenue.

A2-3

Currently, there are no separated or protected bicycle facilities along Normandie Avenue at the project site. The South Bay Bicycle Master Plan designates Normandie Avenue as a bike route (Class III) from 182nd Street to 170th Street, with adjacent streets also designated. A future Bicycle Friendly Street segment on 170th Street is proposed in the plan.

**VMT Screening**

The City uses three screening criteria to determine if a VMT analysis would be required for this project. 1) The project's proposed 403 residential units are expected to generate approximately 1,715 average daily trips (ADT), which would be more than 110 ADT threshold. Also, the Project is not 100 percent affordable. The Project is not screened out from VMT analysis based on project type screening criterion. 2) The Project is in a TAZ estimated to generate 11.01 VMT per capita, which is 23.3 percent below the 2020 SCAG regional baseline VMT of 14.35. When compared to the 2040 SCAG regional baseline VMT of 12.97, the Project's VMT per capita is 15 percent below the 2040 SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project can be presumed to have a less than significant VMT impact and can be screened out from further VMT analysis based on low VMT area screening. 3) The Project has more than 25 percent of its area farther from Gardena's High-Quality Transit Areas. Therefore, the Project is not screened out from VMT analysis under the Transit Proximity screening criterion.

A2-4

Based on the City's transportation guidelines and impact thresholds, the Project can be screened out from a full VMT analysis and is presumed to result in a less than significant transportation impact concerning VMT under the low VMT screening criteria. However, the DEIR does not show why the other criteria are not considered. For this sizable development of 403 multi-family units, we recommend a conservative approach by including a Vehicle Miles Traveled (VMT) analysis. This will help preempt any potential environmental challenges from third parties, ensuring a thorough evaluation of transportation impacts.

**TDM**

Because of the size of the project, we encourage the City to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand*

A2-5

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



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*Management into the Transportation Planning Process: A Desk Reference* (Chapter 8).  
This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

**Post VMT Analysis**

After this development is completed, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be considered and prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City's VMT traffic model results.

A2-6

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

**Traffic Safety Analysis**

On Caltrans' June 7, 2023 letter (see attached), we asked for a safety analysis for Caltrans off-ramps. Traffic safety is a CEQA matter and should be considered by the City. We are not able to identify the safety analysis in Appendix 4.13-1: CEQA Transportation Study nor Appendix 4.13-2: Local Transportation Assessment.

A2-7

**Others**

As a reminder to address Caltrans concerns in preparing VMT and safety analysis, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020, and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review those documents at the following link:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

A2-8

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

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

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



**Letter A2 – State of California Department of Transportation District 7**  
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January 17, 2024  
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If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2023-04396-DEIR.

Sincerely,

*Frances Duong*

FRANCES DUONG  
Acting LDR/CEQA Branch Chief

email: State Clearinghouse

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



## RESPONSE TO COMMENT LETTER NO. A2

Frances Duong, Acting LDR/CEQA Branch Chief  
State of California Department of Transportation, District 7  
January 17, 2024

- A2-1 This comment introduces the California Department of Transportation (Caltrans) response and summarizes the Project. This comment does not address DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.
- A2-2 This comment provides the Project's environmental setting within the context of transit services. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.
- A2-3 This comment provides the Project's environmental setting within the context of pedestrian and bicycle facilities. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.
- A2-4 This comment summarizes vehicle miles travelled (VMT) screening criteria under Senate Bill (SB) 743 and notes that the Project can be screened out from a full VMT analysis based on the City's transportation guidelines and impact thresholds. The commenter further notes the DEIR does not show why other criteria are not considered (specifically, Criteria 1 and 3). Therefore, the comment recommends a VMT analysis be performed to "preempt any potential environmental challenges from third parties, ensuring a thorough evaluation of transportation impacts."

City VMT guidelines do not require a project to meet multiple criteria to screen out from a VMT analysis. The Project meets a criterion in the City guidelines and therefore would have a less than significant impact concerning VMT. However, **DEIR Appendix 4.13-1: CEQA Transportation Study**, specifically states that Criterion 1 does not apply because the Project would generate more than 110 daily trips based on the 11<sup>th</sup> Edition ITE Trip Generation Manual. Additionally, **DEIR Appendix 4.13-1** specifies that Criterion 3 does not apply because the Project is not located in proximity to high quality transit. Therefore, additional analysis concerning VMT is not required or warranted. No further response is necessary.

- A2-5 This comment encourages the City to evaluate transportation demand management (TDM) strategies and intelligent transportation system (ITS) applications to better manage its transportation network. The Project implements TDM strategies and ITS applications via features such as unbundled parking, additional bicycle parking, and a





one-month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees. No further response is necessary.

A2-6 This comment recommends a mitigation measure concerning VMT which would require a VMT analysis to be done after development is completed to help validate the City's VMT traffic model results. CEQA's purpose is to inform government decisionmakers and the public of the potential environmental effects and to prevent significant, avoidable environmental damage. CEQA does not require a project to "look back" or "prove itself" after approval. Additionally, the Project would result in a less than significant impact concerning VMT, therefore, no mitigation is required; see **DEIR Impact 4.13-2**. Therefore, no mitigation measures are required under CEQA. No further response is necessary.

A2-7 The comment expresses concern concerning the DEIR's adequacy in addressing a previous comment requesting a safety analysis for highway off-ramps near the Project as neither transportation appendices (i.e., **DEIR Appendix 4.13-1** or **DEIR Appendix 4.13-2: Local Transportation Study**) appear to address their previous comment. The comment reminds the Applicant that traffic safety is a CEQA matter and therefore should be considered in the analysis.

Additional discussion has been added to the Local Transportation Assessment (**DEIR Appendix 4.13-2**); see below. The Project would not result in safety impacts to Caltrans facilities due to the small number of trips to these facilities and distance to these facilities.

## **DEIR Appendix 4.13-2: Local Transportation Assessment**

*DEIR Page 9*

### 3.3.1 Freeway Ramp & Intersection Queueing at State Facilities

As detailed below in section 3.7, based on the Project's estimates, trip generation and distribution, few trips are expected at the I-405 off-ramps to Normandie/190th or the I-110 off-ramps to Redondo Beach Boulevard (<25 peak hour trips at each location). Therefore, the Project is not expected to add two or more car lengths to these off-ramp queues during peak hours, exacerbate potentially unsafe ramp conditions at these locations (if such conditions exist or are projected to occur in the opening year of the Project), and analysis is not needed. At the intersection of SR-91 and Vermont Avenue, Project traffic is expected to primarily be eastbound and westbound through movements since primary Project access is from Normandie Avenue, where most turning movements would



occur. As such, the Project is not expected to add substantial traffic to any left or right-turning movements at the intersection of SR-91 and Vermont Avenue, and the Project is not expected to materially affect the utilization of turn pocket storage that would lead to an impedence of through traffic. Therefore, no further analysis is needed related to queueing at these locations.

### 3.3.2 Pedestrian & Bicycle Volumes at State Facilities

As detailed below in section 3.7, 5% of the Project's net new trips are expected to be walking or biking in nature, which may also include a subsequent trip on transit. This amounts to less than 10 trips during either peak hour in total. Most of these non-transit biking and walking trips are expected to be local in nature, accessing nearby schools and businesses within 0.5 miles of the Project Site. Substantial bicycle and pedestrian trips generated by the Project are not expected to occur at the SR-91 and Vermont Avenue, I-405 off-ramps at Normandie/190th, or I-110 off-ramps at Redondo Beach Boulevard intersections given how far away they are from the Project Site. SR-91 and Vermont Avenue is located 0.8 miles from the Project Site, while the other two intersections are located over one mile from the Project Site. Because these locations are outside of the Project Study Area, Multi-Modal Conflict Analyses and/or Complete Street Access considerations should not be necessary.

A2-8 This comment provides resources for guidance on performing VMT safety analysis and notes that use of oversized transport vehicles on State highways would require a Caltrans permit. This comment does not address the adequacy or raise a significant environmental issue. As such, no further response is necessary.



**Letter A3 – State of California Department of Conservation Geologic Energy Management Division**  
**Page 1 of 2**



California  
**Department of Conservation**  
Geologic Energy Management Division

**Comment Letter 3**  
Gavin Newsom, Governor  
David Shabazian, Director

January 23, 2024

**VIA EMAIL**

Amanda Acuna, Senior Planner  
City of Gardena  
1700 West 162<sup>nd</sup> Street  
Gardena, CA 90247  
Email: [AAcuna@cityofgardena.org](mailto:AAcuna@cityofgardena.org)

Dear Ms. Acuna:

**NORMANDIE CROSSING SPECIFIC PLAN PROJECT**  
**DRAFT EIR**  
**CITY OF GARDENA**  
**SCH: NO. 2023050241**

The Department of Conservation's Geologic Energy Management Division (Division) has reviewed the above-referenced project for impacts with Division jurisdictional authority. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration.

A3-1

The project area is in Los Angeles County and lies outside any administrative oil field. On Page 4.6-9 of the Draft EIR, the author states, "According to California Division of Oil, Gas and Geothermal Resources (CalGEM), no oil or gas wells are located on or immediately adjacent to the site. The closest well was identified to be located approximately 480 feet south of the site and is reported as "abandoned." In fact, Division mapping shows an abandoned "wildcat" well, the "Gardena E.H." 1 well shown on our "Well Finder" online app as along Brighton Way between 169<sup>th</sup> and 170<sup>th</sup>. Upon our review of the 1967 well abandonment documents for this "dry hole," it appears that this well was more precisely located, "From the intersection of 170<sup>th</sup> Street and Brighton Way, 121' north and 55' east." This would place this well in the parking area behind the southernmost building currently shown on the project property. Division information can be found at: [www.conservation.ca.gov](http://www.conservation.ca.gov). Individual well records are also available on the Division's web site, or by emailing [CalGEMSouthern@conservation.ca.gov](mailto:CalGEMSouthern@conservation.ca.gov).

A3-2

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative

State of California Natural Resources Agency | Department of Conservation  
Southern District, 3780 Kilroy Airport Way, Suite 400, Long Beach, CA 90806  
[conservation.ca.gov](http://conservation.ca.gov) | T: (562) 637-4400 | F: (562) 424-0166



**Letter A3 – State of California Department of Conservation Geologic Energy Management Division**  
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SCH: No. 2023050241  
City of Gardena  
January 23, 2024  
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regulations under Title 14, Division 2, Chapters 2, 3 and 4 of the California Code of Regulations.

A3-2

If any wells, including any plugged, abandoned, or unrecorded wells, are damaged or uncovered during excavation, grading or other project operations, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements and approval to perform remedial operations.

A3-3

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division recommends that a diligent effort be made to avoid building over any plugged and abandoned well.

Questions regarding the Division's Construction Site Well Review Program can be addressed to the local Division's office in Long Beach by emailing [CalGEMSouthern@conservation.ca.gov](mailto:CalGEMSouthern@conservation.ca.gov) or by calling (562) 637-4400.

Sincerely,

Curtis M. Welty, PG  
Associate Oil and Gas Engineer

cc: Governor's Office of Planning and Research, State Clearinghouse Unit  
Email: [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)  
Office of Legislative and Regulatory Affairs  
Email: [OLRA@conservation.ca.gov](mailto:OLRA@conservation.ca.gov)  
Jan Perez, CalGEM CEQA Unit  
Email: [Jan.Perez@conservation.ca.gov](mailto:Jan.Perez@conservation.ca.gov)  
Environmental CEQA File



### RESPONSE TO COMMENT LETTER NO. A3

Curtis M. Welty PG, Associate Oil and Gas Engineer  
State of California Department of Conservation Geologic Energy Management Division  
January 23, 2024

- A3-1 This comment introduces the California Department of Conservation – Geologic Energy Management Division (CalGEM) and summarizes the department’s jurisdictional authority. This comment does not address the DEIR’s adequacy or raise a significant environmental issue. As such, no further response is necessary.
- A3-2 This comment provides a revision to the DEIR’s existing setting concerning nearby existing wells and notes the adjacent plugged well (an abandoned “wildcat” well identified as “Gardena E.H.”) mapped outside the Project is within the Project site (approximately 121 feet north, 55 feet east). This comment is noted, and a minor revision to the existing setting and impact analysis in **DEIR Section 4.6: Hazards and Hazardous Materials** is included as shown below.

### DEIR Section 4.6: Hazards and Hazardous Materials

*DEIR Page 4.6-9*

~~According to California Division of Oil, Gas and Geothermal Resources (CalGEM), no oil or gas wells are located on one abandoned “dry hole” “wildcat” well, identified as “Gardena E.H,” exists 121 feet north and 55 feet east from the intersection of 170th Street and Brighton Way thereby placing the well within the parking area east of the southernmost building. There are no oil or gas wells located or immediately adjacent to the site. The closest well was identified to be located approximately 480 feet south of the site and is reported as “abandoned”.~~

*DEIR Page 4.6-21*

As previously addressed, the Phase I ESAs identified various onsite RECs associated with past uses of the Project site. As discussed in **Section 4.6.1: Existing Setting**, there is an existing abandoned well within the Project site where townhomes are proposed. This well is already abandoned and would be capped during Project construction in coordination with CALGEM.

- A3-3 This comment reiterates the requirement to contact the Division’s district office to obtain information on the requirements and approval of remedial operations if any well is damaged or uncovered during Project operations. Further, the comment recommends that “a diligent effort be made to avoid building over any plugged and



abandoned well.” This comment does not address the DEIR’s adequacy or raise a significant environmental issue. As such, no further response is necessary.



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Comment Letter 4



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**VIA E-MAIL**

January 19, 2024

Amanda Acuna, Senior Planner  
City of Gardena  
1700 West 162<sup>nd</sup> Street  
Gardena, CA 90247  
[Em: aacuna@cityofgardena.org](mailto:aacuna@cityofgardena.org)

**RE: City of Gardena, Normandie Crossing Specific Plan Project**

Dear Amanda Acuna,

On behalf of the Western States Regional Council of Carpenters (“Western Carpenters” or “WSRCC”), my Office is submitting these comments for the City of Gardena’s (“City”) Draft Environmental Impact Report (“DEIR” or “Draft EIR”) for the Normandie Crossing Specific Plan (“SP”) Project (“Project”), SCH No. 2023050241.

According to the DEIR,

The Project proposes to establish a maximum allowable development within the approximately 5.25-acre [Normandie Crossing Specific Plan (“NCSP”)] area of up to 403 DU. Because the City does not have any zone which would accommodate the proposed development, the Applicant is proposing the NCSP, which would establish the site-specific zoning regulations and development standards for this area. The NCSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. In addition to requiring a Specific Plan, the Project requires various other approvals, including a Development Agreement

(DEIR, p. 2-11.)

The Western Carpenters is a labor union representing almost 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

A4-1



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Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the SP’s environmental impacts.

A4-1

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the SP, and at any later hearing and proceeding related to this SP. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

A4-2

The Western Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the SP. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, the Western Carpenters requests that the City provide notice for all notices referring or related to the SP issued under the California Environmental Quality Act (CEQA) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law (“Planning and Zoning Law”) (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

A4-3

**I. THE CITY SHOULD INCORPORATE LANGUAGE THAT REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY’S ECONOMIC DEVELOPMENT AND ENVIRONMENT**

The City should incorporate language into the proposed SP requiring residential, commercial and mixed-use developments within the SP area to be built using local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program.

A4-4





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Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the SP. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of projects within the SP area can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

A4-5

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

A4-6

[L]abor should be considered an investment rather than a cost and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.<sup>1</sup>

Furthermore, workforce policies have significant environmental benefits given that they improve an area’s jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program” can result in air pollutant reductions.<sup>2</sup>

A4-7

<sup>1</sup> California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, available at <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

<sup>2</sup> South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve



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Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.<sup>3</sup>

A4-7

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.<sup>4</sup> Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

A4-8

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022,

A4-9

Supporting Budget Actions, available at <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>.

<sup>3</sup> California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, available at <https://cprroundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

<sup>4</sup> Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, available at <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.



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otherwise known as Assembly Bill No. 2011 (“AB2011”). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements. The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

A4-9

**II. THE CITY SHOULD INCORPORATE LANGUAGE IMPOSING TRAINING REQUIREMENTS FOR CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES INTO THE GP.**

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.<sup>5</sup>

Western Carpenters recommend that the City adopt additional requirements to mitigate public health risks from various residential, commercial and mixed-use development construction activities. Western Carpenters requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on residential, commercial and mixed-use developments within the SP area.

A4-10

In particular, based upon Western Carpenters’ experience with safe construction site work practices, Western Carpenters recommends that the City require that while construction activities are being conducted within the SP area (“Project Site”):

**Construction Site Design:**

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.

<sup>5</sup> Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, available at <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.



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- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

**Testing Procedures:**

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

A4-10



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- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

#### Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.<sup>6</sup>

A4-10

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

Western Carpenters has also developed a rigorous Infection Control Risk Assessment (“ICRA”) training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves

<sup>6</sup> See also The Center for Construction Research and Training, North America’s Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, available at [https://www.cpwr.com/sites/default/files/NABTU\\_CPWR\\_Standards\\_COVID-19.pdf](https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf); Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at [https://dpw.lacounty.gov/building-and-safety/docs/pw\\_guidelines-construction-sites.pdf](https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf).



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and all others during renovation and construction projects in healthcare environments.<sup>7</sup>

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The City should incorporate language requiring the residential developments related to the SP be built using a workforce trained in ICRA protocols.

A4-10

### III. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

#### A. Background Concerning the California Environmental Quality Act

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations (“CEQA Guidelines”), § 15002, subd. (a)(1).<sup>8</sup> At its core, its purpose is to “inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made.” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

##### 1. Background Concerning Environmental Impact Reports

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the

A4-11

<sup>7</sup> For details concerning Western Carpenters’ ICRA training program, see <https://icrahealthcare.com/>.

<sup>8</sup> The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Cal. Pub. Res. Code, § 21083. The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.



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environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an ‘abuse of discretion’ standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the court stated in *Berkeley Jets*, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the “fair argument” standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail*

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*Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602;  
*Friends of “B” St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that “may have a significant effect on the environment.” PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

“Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a “low threshold” for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of*

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*Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of “B” St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1).

A4-11

**B. The Project May Have a Significant Hazards Impact**

The Project may have a significant hazards impact. The DEIR provides two Phase I Environmental Site Assessments (“ESA” or “Phase I ESA”) prepared by Partner Engineering and Science, Inc., with a January 7, 2021 ESA included in Appendix 4.6-2 concerning the Project Site’s *southern* portion (APN 6106-030-017) (“**South Phase I ESA**”), and a July 13, 2021 ESA included in Appendix 4.6-1 concerning the Project Site’s *northern* portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016) (“**North Phase I ESA**”). (DEIR, 4.6-1.) However, the Phase I ESAs are outdated and manifestly incomplete.

**1. Background on Phase I, II, and III Environmental Site Assessments**

The preparation of a Phase I ESA is “to research the current and historical uses of a property as part of a commercial real estate transaction” and “to assess if current or historical property uses have impacted the soil or groundwater beneath the property and could pose a threat to the environment and/or human health.”<sup>9</sup>

A4-12

As explained by experts in the field of ESA:

The primary difference between Phase I and Phase II site assessment lies in the scopes of work of the assessment. A Phase I primarily assesses the likelihood that a site is contaminated through visual observations, historical use reviews and regulatory records, while a Phase II assesses whether contamination is in fact present. Here are the components of each.

**Phase I Environmental Site Assessment**

Review of records, to discover whether the site has been used for potentially hazardous purposes in the past.

Visual inspection of the property’s current condition, with comparison to site plans.

<sup>9</sup> Jenny Redlin, REPA, Partner Engineering and Science, Inc., *What is a Phase I Environmental Site Assessment* (Apr. 9, 2018), available at [https://www.partneresi.com/resources/articles/what-is-a-phase-i-environmental-site-assessment/#:~:text=A%20Phase%20I%20Environmental%20Site%20Assessment%2C%20commonly%20referred%20to%20as,a%20commercial%20real%20estate%20transaction.&context=refined%20to%20as,a%20commercial%20real%20estate%20transaction.](https://www.partneresi.com/resources/articles/what-is-a-phase-i-environmental-site-assessment/#:~:text=A%20Phase%20I%20Environmental%20Site%20Assessment%2C%20commonly%20referred%20to%20as,a%20commercial%20real%20estate%20transaction.&context=refined%20to%20as,a%20commercial%20real%20estate%20transaction) (accessed on Jan. 18, 2024).



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Visual inspection of adjoining properties.

Interviews with current property owners, operators, occupants, and local government officials.

Goal: Assess likelihood that property has been contaminated.

**Phase II Environmental Site Assessment**

Soil and water sampling for signs of contamination.

Comparison of lab results with local, state, and federal regulatory guidelines.

May include inspection of interior spaces for mold, radon, or lead paint.

May include identification of wetlands, ecological resources, or endangered species that may prevent certain land uses.

Goal: Assess actual presence of environmental contaminants.

**Phase III Site Assessment**

A Phase III Site Assessment is called for only when contamination has been identified. A Phase III Assessment determines the extent of the contamination, both horizontally and vertically, and forms the basis for preparing a remediation plan, and estimation of the cost for remediation. Buyers and lenders use the Phase III Assessment as a negotiating tool with the sellers to ensure the property they purchase yields the benefit they expect.<sup>10</sup>

Standards for performing a Phase I ESA have been established by the US Environmental Protection Agency (“EPA”) and the American Society for Testing and Materials Standards (“ASTM”).<sup>11</sup>

A4-12

2. *The Phase I ESAs are Inadequate and Outdated*

As a preliminary matter, the Phase I ESAs were prepared in January and July of 2021, approximately three (3) years ago. In addition, given that the conditions of the Project Site and its surrounding area may have changed since 2021, the ESAs are now outdated.

A4-13

<sup>10</sup> Robert B. Greene, Phase I versus Phase II Environmental Site Assessment *available at* <https://www.gleassociates.com/phase-i-versus-phase-ii-environmental-site-assessments/> (accessed on Jan. 18, 2024.)

<sup>11</sup> See, <https://www.astm.org/e1527-21.html> (last updated on Dec. 21, 2021.)



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Even further, and as detailed further below, the ESAs were conducted in 2021, which was prior to the EPA’s subsequent adoption of the newer ASTM E1527-21 (“ASTM E1527-21”), thereby replacing the older and less stringent ASTM E1527-13 (“ASTM E1527-13”). Accordingly, the Phase I ESAs rely upon E1527-13 (DEIR Appendix 4.6-1, p. 4, Appendix 4.6-2, p. 3). However, it is critical that the Phase I ESAs implement the newer ASTM E1527-13 standard for identifying Recognized Environmental Conditions (“REC”), as discussed further below.

Therefore, the DEIR must be revised and recirculated to include new Phase I ESAs and, moreover, a new Phase II ESA, that adequately evaluate the Project’s potential hazards impact and that apply the more recent and more stringent E1527-21 standard.

*3. The Phase I ESA Improperly Relies on ASTM 1527-13 While the EPA Recently Adopted and Validated ASTM 1527-21*

As noted above, the Phase I ESAs are incomplete and inaccurate for purposes of CEQA because they only use the obsolete ASTM E1527-13, while the nonprofit organization ASTM International, founded as the American Society for Testing and Materials, has long adopted its more stringent ASTM Standard Practice E1527-21, which is in fact more rigorous than its predecessor E1527-13. Because Phase I ESAs rely upon the E1527-13 methodology recommended by ASTM International to identify Recognized Environmental Conditions in connection with the Project Site, they fail to adequately disclose the potential RECs on the Project Site and, as related, the Project-specific potential hazards and hazardous impacts and adverse impacts on human beings.

Specifically,

- “Under ASTM E1527-13, a REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.
- Under ASTM E1527-21, a REC means (1) the presence of hazardous substances or petroleum due to a release to the environment; (2) the *likely* presence of hazardous substances or petroleum products due to a *likely* release to the environment; or

A4-13



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(3) the presence of hazardous substances or petroleum products under conditions that pose a material threat of a future release to the environment. Further, the new standard provides clarifying discussion notes and examples to assist the environmental professional in applying the definition. Together, the new definition and interpretations direct a consultant to rely on the environmental professional’s experience regarding the *likelihood* of certain conditions resulting in releases, such as the long term operation of a dry cleaner, instead of discounting that professional experience based on the lack of current “indications of a release.”<sup>12</sup> (ital. original, bold emphasis added.)

Accordingly, as shown above in the E1527-21 definition of a REC, the use of phrases, “likely presence” or “likely release” are more stringent than the REC definition in E1527-13, which leaves out the potential impact for purposes of CEQA. The newer E1527-21, on the other hand, encompasses those concerns. Since the Phase I ESAs do not implement E1527-21, they could fail to account for other potential RECs at the Project Site.

A4-13

Here, for example, the North Phase I ESA directly admits the Project Site is currently occupied by three (3) buildings, Buildings A-C, which were constructed in 1963, 1978, and 1957, respectively (DEIR Appendix 4.6-1, p. ii.) and that, based on the historical and regulatory sources, the property was occupied by “various light-industrial tenants,” which included “two machine shops, an auto body repair operation, an engine repair business (FM Engine), a cabinet maker, and several manufacturing entities, all operations that would have used or stored hazardous substances.” (*Id.* at p. iii.) The North Phase I ESA further notes that because some of the manufacturing tenant listings predated 1980, there is no documentation regarding “historical hazardous substance use, storage, or disposal practices.” (*Id.*) The North Phase I ESA even further notes that there were some paint booths historically identified in connection with prior tenants and usage of solvents. (*Id.*)

<sup>12</sup> Quarles, *EPA Approves ASTM E1527-21 Phase I ESA Standard for All Appropriate Inquiry* (Mar. 29, 2022), available at <https://www.quarles.com/publications/epa-approves-astm-e1527-21-phase-i-esa-standard-for-all-appropriate-inquiry/> (accessed on Jan. 18, 2024.)



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Finally, the North Phase I ESA concludes that

Partner understands the subject property is planned for residential redevelopment. Based on the plan to redevelop this site with a sensitive receptor (i.e. residential), the long-term duration of use/occupancy by businesses that used, stored and disposed of hazardous substances (60+ years), and lack of any subsurface data, the long-term light-industrial usage of the subject property is considered to be a REC.

(Appendix 4.6-1, *supra*.)

Therefore, the North Phase I ESA identifies a REC at the Project Site and acknowledges that there will be residential use at the Project Site. Accordingly, it is imperative that the City adequately addresses this in the EIR and mitigates the significant hazards impacts. As such, the DEIR should be revised and recirculated to include updated Phase I ESAs using the more stringent ASTM E1527-21 standard to account for any other potential RECs at the Project Site that might not have been accounted for under the previous ASTM E1527-13 standard.

A4-13

4. *The Project May Have Significant Hazards Impacts, as Well as Adverse Impacts on Human Beings Requiring Mandatory Findings of Significance*

Under CEQA Guidelines section 15065, subdivision (a)(1)(4), a lead agency “shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where [...] (4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.”

The North Phase I ESA expressly confirms that, due to the age of the buildings situated on the Project Site, there is potential for the presence of asbestos-containing materials (“ACM”) and/or lead-based paint (“LBP”) (DEIR Appendix 4.6-1, p. iv.)

It is undisputed that both *lead* and *asbestos* are dangerous to people’s health. While intact asbestos by itself may not be hazardous, damaged or disturbed asbestos may release asbestos fibers and become a health hazard.<sup>13</sup> Per Occupational Health and Safety Administration’s (“OSHA”) description:

A4-14

<sup>13</sup> See, <https://www.cpsc.gov/safety-education/safety-guides/home/asbestos-home>; see also, medical conditions associated with asbestos: [https://www.atsdr.cdc.gov/asbestos/health\\_effects\\_asbestos.html](https://www.atsdr.cdc.gov/asbestos/health_effects_asbestos.html)



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**What are the hazards of asbestos?**

Asbestos is well recognized as a health hazard and its use is now highly regulated by both OSHA and EPA. Asbestos fibers associated with these health risks are too small to be seen with the naked eye. Breathing asbestos fibers can cause a buildup of scar-like tissue in the lungs called asbestosis and result in loss of lung function that often progresses to disability and death. Asbestos also causes cancer of the lung and other diseases such as mesothelioma of the pleura which is a fatal malignant tumor of the membrane lining the cavity of the lung or stomach. Epidemiologic evidence has increasingly shown that all asbestos fiber types, including the most commonly used form of asbestos, chrysotile, causes mesothelioma in humans.

OSHA’s Definition of “Asbestos” on its Official Website.<sup>14</sup>

Similarly, *lead* is dangerous to people and their families. Per OSHA’s report:

Lead has been poisoning workers for thousands of years. Lead can damage the central nervous system, cardiovascular system, reproductive system, hematological system, and kidneys. When absorbed into the body in high enough doses, lead can be toxic.

In addition, workers’ lead exposure can harm their children’s development. Short-term (acute) overexposure—as short as days—can cause acute encephalopathy, a condition affecting the brain that develops quickly into seizures, coma, and death from cardiorespiratory arrest.

Short-term occupational exposures of this type are highly unusual but not impossible. Extended, long-term (chronic) overexposure can result in severe damage to the central nervous system, particularly the brain. It can also damage the blood-forming, urinary, and reproductive systems. There is no sharp dividing line between rapidly developing acute effects of lead and chronic effects that take longer to develop.<sup>15</sup>

A4-14

<sup>14</sup> See, United States Department of Labor, *Asbestos*, available at <https://www.osha.gov/asbestos> (accessed on Jan. 18, 2024.)

<sup>15</sup> See, OSHA Report, *Lead in Construction* (2004) p. 3, available at <https://www.osha.gov/sites/default/files/publications/osha3142.pdf> (accessed on Jan. 18, 2024.)



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OSHA also documents the adverse effects of lead on people’s reproductive health:

**REPRODUCTIVE RISKS**

Lead is toxic to both male and female reproductive systems. Lead can alter the structure of sperm cells and there is evidence of miscarriage and stillbirth in women exposed to lead or whose partners have been exposed. Children born to parents who were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.

Workers who desire medical advice about reproductive issues related to lead should contact qualified medical personnel to arrange for a job evaluation and medical followup--particularly if they are pregnant or actively seeking to have a child. Employers whose employees may be exposed to lead and who have been contacted by employees with concerns about reproductive issues must make medical examinations and consultations available.<sup>16</sup>

A4-14

Therefore, the Project may also cause a significant hazard impact due to the demolition hazards, including impacts to human beings and sensitive receptors, air, and water quality. Thus, under CEQA Guidelines section 15065(a)(1)(4), the City shall make mandatory findings of significance and order that the EIR be revised and recirculated to thoroughly assess the potential hazards impact of the Project and its required demolition activities and potential handling of asbestos and lead-based paint and mitigate those impacts to a level of insignificance.

**C. The Project May Have a Significant Noise Impact**

There is substantial evidence the Project will have a significant noise impact. The DEIR directly admits that “[t]he Project’s construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning equipment and a temporary noise barrier . . .” (DEIR, p. 6-19.) The DEIR further proposes various noise mitigation measures, including implementation of a temporary and impermeable sound barrier of ten feet (10) high with a minimum 12dBA noise reduction and minimum Sound Transmission Class rating of STC-25, along with use of large brass construction equipment a minimum of forty-five (45) feet away from the

A4-15

<sup>16</sup> *Id.* at p. 4.



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off-site residence adjacent to the Project Site (i.e. MM NOI-1 and MM NOI-2), however, the DEIR still concludes that even with implementation of the noise mitigation measures, there will be a significant and unavoidable impact. (*Id.* at ES-16.) However, given that the DEIR identifies numerous noise-sensitive receptors near the Project Site, including the residential uses to the north, south, and west, it is imperative that the City require further mitigation be implemented to reduce the impacts to a level of insignificance.

A4-15

Accordingly, the City should require that the DEIR be revised and recirculated to adequately mitigate the Project’s significant noise impacts.

**IV. CONCLUSION**

Based on the foregoing, the City should require that the DEIR be revised and recirculated pursuant to CEQA to address the comments and issues identified in this letter. Similarly, the City should require additional environmental studies be performed to comply with CEQA and other state laws.

A4-16

Sincerely,

Stephanie Papayanis  
Attorneys for Western States  
Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);  
Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and  
Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

A4-17





## RESPONSE TO COMMENT LETTER NO. A4

Stephanie Papayanis, Attorney  
Western States Regional Council of Carpenters  
January 19, 2024

- A4-1 This comment is introductory in nature and states that the Law Office of Mitchell M. Tsai has submitted comments on behalf of the Western States Regional Council of Carpenters. No further response is necessary.
- A4-2 The comment states that the commenter reserves the right to supplement the comments and incorporates by reference all comments regarding the EIR. The comment is noted. No further response is necessary.
- A4-3 The commenter requests receipt of further notices referring to or related to the Project. The City acknowledges the commenter's request and will include the commenter on the mailing list for future Project-related CEQA notices. No further response is necessary.
- A4-4 The commenter requests that the City require the Project to be built using local workers who have graduated from a specified apprenticeship program.

The Project includes approval of a Development Agreement which includes a requirement that the Applicant implement a local hiring policy as specified in Development Agreement Exhibit D as a public benefit. The commenter does not explain or provide any evidence, let alone substantial evidence, as to how using labor that has graduated from a state-approved apprenticeship training program, or who are registered apprentices in such a program, creates any environmental benefits. The commenter's request does not address the DEIR's adequacy or identify an environmental issue. As such, no further response is necessary.

- A4-5 The commenter suggests that using local workers (i.e., residing within 10.0 miles of the Project site) would reduce VMT, reduce greenhouse gas emissions (GHG), improve jobs/housing balance, and the Project's economic performance. See Response A4-4, noting that the Development Agreement already requires utilizing a local workforce where possible as a public benefit. Additionally, see Responses A4-6 thru A4-8. The commenter also suggests that local hire provisions can improve the positive economic impact of the Specific Plan. Economics are not a CEQA issue. Nonetheless, it is noted that Development Agreement Exhibit D also includes a "buy local" provision.



A4-6  
Thru  
A4-8

The commenter references an attachment to the comment letter from Soil Water Air Protection Enterprise (SWAPE) (“SWAPE Letter”; March 8, 2021) and refers the reader to the SWAPE Letter for commentary and analysis related to local hire requirements related to GHG modeling. This commenter alleges that workforce requirements promote the development of skilled trades that yield sustainable economic development. The comment states that labor should be considered an investment and well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.

This commenter also alleges that workforce policies have significant environmental benefits and that they improve an area’s jobs-housing balance, and decrease the amount and length of job commutes and the associated greenhouse gas emissions. The commenter refers to a 2021 South Coast Air Quality Management District statement that the use of a local state-certified apprenticeship program can result in air pollutant reductions. This comment alleges that local hire mandates and skill training are critical facets of a strategy to reduce VMT. The commenter also references a 2006 article from the Journal of the American Planning Association to note the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.

See Response A4-4, noting that the Development Agreement already requires utilizing a local workforce where possible as a public benefit. Additionally, as mentioned above, sustainable economic development is not an environmental issue, as such no further response is necessary.

The commenter included a letter from SWAPE dated March 8, 2021 (which predates the NOP’s release), which discusses GHG emissions associated with trip lengths for construction workers traveling to a job site. The SWAPE letter provided calculations for GHG emissions reductions resulting from local hire provisions being applied to the referenced project’s construction. The SWAPE letter concludes that if a local hire provision with a 10.0-mile radius were implemented, the GHG emissions associated with the Project’s construction would decrease. The SWAPE letter states that it ran a model “reducing all worker trip lengths to 10 miles...” Therefore, the SWAPE letter assumes that a local hire program would produce 100 percent local residents as a project’s construction workforce while being located within 10.0 miles of a project site. It is noted that the SWAPE letter and the calculations provided used data related to a different project in a separate jurisdiction, the Village South Specific Plan in the City of Claremont, respectively. The calculations also use prior versions of CalEEMod



and EMFAC. Therefore, the calculations do not pertain to the Project and are not based on correct modeling.

The commenter also relies on a 2008 California Roundtable discussion noting that people who live and work in the same jurisdiction could include potential reductions in VMT and vehicle hours traveled.

The DEIR concluded that the Project would result in less than significant impacts concerning GHG emissions and VMT and therefore no further mitigation would be required; see **DEIR Section 4.5: Greenhouse Gas Emissions** and **DEIR Section 4.13: Transportation**, respectively. As impacts related to GHG and VMT are less than significant, there is no obligation pursuant to CEQA to further reduce these potential impacts. Additionally, the commenter does not provide any substantial evidence (only conclusory opinions) to dispute the DEIR's analysis to demonstrate that local hire mandates and skill-training policies would specifically reduce VMT. These comments do not relate to the DEIR's adequacy or content, do not provide new information or evidence related to the DEIR's analysis, and do not affect the DEIR's completed analysis or conclusions.

A4-9 This comment provides background information concerning the Affordable Housing and High Road Jobs Act of 2022 and reiterates its comments that the City should consider utilizing local workforce policies to benefit the local area economically and to mitigate GHG emissions, improve air quality, and reduce transportation impacts. The commenter's opinions are noted; see Response A4-4 thru A4-8.

A4-10 The comment suggests the incorporation of training requirements for construction activities to prevent community spread of COVID-19 and other infectious diseases during Project construction and notes that such requirements include construction site design requirements, testing procedures, and infectious disease preparedness and response timing.

COVID-19 is a public health issue, not a Project-related CEQA effect. State and local governments implement regulations and enforce safe working conditions for construction sites. Project construction activities would be subject to compliance with all applicable safety regulations if COVID-19 persists at the commencement of construction of any Project phase. Construction workers would be required to comply with any guidelines and requirements issued by the State of California, the County of Los Angeles, and the City of Gardena, as well as any additional safety measures required by the Project site's construction manager. This comment does not relate to the DEIR's adequacy or content, does not provide new information or evidence



related to the DEIR's analysis, and does not affect the DEIR's completed analysis or conclusions. No further response is necessary.

A4-11 This comment provides background to CEQA and the fair argument test regarding an EIR's analysis. No further response is necessary.

A4-12 This comment provides a background to the standards and purposes of Phase I, II, and III ESAs and questions the adequacy of the DEIR's analysis of hazardous materials due to the Phase I ESA's using an older assessment standard.

ASTM E1527-13 already includes "likely presence" as a test, as the commenter notes on page 13. Furthermore, the use of older ASTM standard would not change conclusion. As the commenter notes, the site was identified as a REC, so the analysis and conclusion (and thus mitigation) would remain unchanged with an updated Phase I. As analyzed in **DEIR Impact 4.6-1**, the Project would comply with COA HAZ-1, which requires an asbestos survey prior to demolition and COA HAZ-2 which requires independent evaluation for lead-based paint (LBP) to address potential impacts to construction workers during demolition of structures which could include asbestos or LBP. Furthermore, the Project would be required to prepare a Construction Management Plan per MM HAZ-1, which would mitigate construction impacts from undocumented contaminants to less than significant.

A4-13 This comment questions the relevancy of the DEIR's Phase I ESA analysis as they are outdated and use older, less stringent standards rather than the newer and current standard (ASTM-E1627-13 vs. ASTM E1527-21).

Please see Response A4-12 above.

A4-14 This comment notes that there is potential for the presence of asbestos-containing materials (ACM) and/or LBP citing the North Phase I ESA (**DEIR Appendix 4.6-1**). The comment further discusses the harms of ACM and LBP to human health and concludes that these risks should be considered significant and concludes that the DEIR should be revised and recirculated "to thoroughly assess the potential hazards impact of the Project and its required demolition activities and potential handling of asbestos and lead-based paint and mitigate those impacts to a level of insignificance."

As discussed in **DEIR Section 4.6**, the Phase I ESA notes the potential presence of ACM and LBP and designates existing buildings as a REC. However, as discussed in **DEIR Section 4.6**, these potential impacts would be addressed by COA HAZ-1 and COA HAZ-2, which would require an asbestos survey prior to demolition and LBP testing if paint



is separated from building materials during demolition, thereby reducing the potential impacts to less than significant. No further response is necessary.

- A4-15 The comment cites the DEIR’s construction noise analysis and alleges MM NOI-1 and NOI-2 are insufficient in addressing noise impacts concerning the Project. The comment suggests the City revise and recirculate the DEIR to “adequately mitigate the Project’s significant noise impacts,” but provides no suggestions or mitigation measures to reduce the impact to less than significant.

As discussed in **DEIR Section 4.9: Noise**, noise impacts from construction would be considered significant and unavoidable. As noted in **DEIR Section 4.9**, the Project’s construction activities would be exempt from the City’s noise standards with certain restrictions pursuant to Gardena Municipal Code (GMC) § 8.336.080 (construction activities would not take place during City-set days/hours). However, construction noise levels have been conservatively analyzed to the City’s operational noise standards. Mitigation measures NOI-1 and NOI-2 would reduce construction noise by establishing a temporary sound barrier and requiring all power construction equipment (including combustion engines), fixed or mobile to be equipped and maintained with state-of-the-art noise shielding and muffling devices. Nonetheless, impacts would remain significant and unavoidable. The commenter does not provide any suggested mitigation measures which could reduce construction noise below the operational noise standards. As discussed in **DEIR Section 6.5: Alternatives Considered but Rejected**, unless demolition is avoided (and the existing structures remain), no modification of the Project would avoid the Project’s significant unavoidable construction noise impacts. This was rejected as infeasible, as it would preclude development throughout the majority of the Project site.

- A4-16 The comment summarizes and concludes the letter by suggesting the City should revise and recirculate the DEIR to address “comments and issues identified in this letter.” Further, the comment suggests the City “should require additional environmental studies be performed to comply with CEQA and other state laws.”

Please see Responses A4.4 - A4.15 above. No further response is necessary.

- A4-17 This comment includes attachments referenced in the comment letter, including a March 8, 2021 SWAPE letter to Mitchem M. Tsai RE: Local Hire Requirements and Considerations for Greenhouse Gas Modeling and the professional work experiences for two experts (on unrelated projects). As such, no further response is necessary.



## Letter A5 – Tish McCauley

Page 1 of 1

### Normandie Crossing Objection

Tish McCauley <tishmccauley@gmail.com>

Sun 2/25/2024 12:26 PM

To:Amanda Acuna <AAcuna@cityofgardena.org>

Caution! This message was sent from outside your organization.

Hi Angela,

I'm sorry for accidentally sending the incomplete email a minute ago.

Thanks for accepting and presenting these concerns on my behalf.

While I understand the need to add housing and provide for low-income housing, I am vehemently opposed to this project for the following reasons:

A5-1

1) I live off Normandie and 170th and can attest that the traffic on Normandie is almost gridlocked between 182nd and Redondo Beach Blvd.

A) It is particularly difficult to travel during school drop-off and pickup times M-F.

B) 170th has become a speedway shortcut for locals to avoid Artesia on the way out of Gardena, and adding 403 residences will only increase the short-cut traffic on a residential street.

C) There is another residential construction project that was not considered in the traffic study, (since it isn't completed yet), traffic at Normanie and Magnolia.

A5-2

2) Allowing for a 7-story residential building within an established, quiet neighborhood sets a dangerous precedent for future development. We are talking about a building that is as tall as Gardena Memorial Hospital! Even the new townhomes at 168th and Normandie staggered their 2-and3-story homes to "fit" into the style of the surrounding neighborhood.

A5-3

3) Most homes that will be east of the 7-story building don't need air-conditioning due to the ocean breeze's benefit. A wall of apartments will eliminate that breeze for long-term homeowners.

A5-4

4) Residential parking is already congested, and adding hundreds of additional cars will only exacerbate the frustration that current residents feel, especially on street-sweeping days!

A5-5

5) The map on the planning site shows that the project is bordered by "Brighton Way" - which is an alley, not an actual street. At the developer's meeting, they mentioned that the alley would be used as an entrance/exit.

A5-6

I'm looking forward to being notified of the planning and council meetings that will address this

project. Thanks

Tish McCauley



## RESPONSE TO COMMENT LETTER NO. A5

Tish McCauley, Resident

February 25, 2024

A5-1 This comment is introductory in nature and does not address an environmental topic. As such, no response is required.

A5-2 This comment notes concerns with existing traffic volumes on South Normandie Avenue and how Project trips would affect these traffic volumes. Specifically, the commenter notes existing traffic congestion during school drop-off and pick-up times Monday through Friday. The Project would increase trips on South Normandie Avenue. However, the Project has been designed to minimize increased trips through TDM strategies and ITS applications. These include features such as unbundled parking, additional bicycle parking, and a one-month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees.

The commenter is concerned that Project traffic would use West 170<sup>th</sup> Street to avoid congestion on South Normandie Avenue. The townhome component has an entry/exit onto West 170<sup>th</sup> Street as well as West 169<sup>th</sup> Street. The apartment component does not have access to West 170<sup>th</sup> Street. Thus, it is likely only townhome residents would use West 170<sup>th</sup> Street. Additionally, the townhome component also has an entry/exit on West 169<sup>th</sup> Street, thus, only the townhomes closer to West 170<sup>th</sup> Street would use this entry/exit.

This comment also notes another residential development on South Normandie Avenue and Magnolia Avenue. As shown on **DEIR Appendix 4.13-2** Figure 3 and listed in **DEIR Appendix 4.13-2** Table 4, this future development is analyzed as Related Project #6.

A5-3 This comment notes concerns with mass and height. The Project has been designed to buffer surrounding land uses from the apartment component by including three-story townhomes at the perimeter of the Project site, adjacent to existing residential uses. There are already two-story residential uses and a multi-family development on West 169<sup>th</sup> Street north of the Project site, thus, the Project would be similar in character and use to surrounding land uses.

Additionally, in response to community feedback, the “Community Input” Alternative, which would reduce the apartment building height from seven to five above ground



- stories, has been analyzed in **DEIR Section 6.0: Alternatives**; see **FEIR Section 3.0: Errata to the Draft EIR** for a complete description of the Community Input Alternative.
- A5-4 This comment notes concerns with the apartment building height and breeze to residential uses east of the Project site. It is noted that South Normandie Avenue is east of the Project site and the apartment building would be more than 80 feet away from the residences to the east. Additionally, a single building is unlikely to interfere with breeze. Furthermore, breeze and air conditioning are not an environmental concern. Therefore, no further response is necessary.
- A5-5 This comment notes concerns with street parking by Project residents on surrounding streets. The Project proposes 399 parking spaces for the apartment building and 160 parking spaces for the townhomes. Based on the provided parking and connection to surrounding public transit, it is not anticipated that Project residents would park on surrounding streets. Furthermore, regular street parking by Project residents would also be inconvenient, as Project residents would need to carry belongings to and from the Project site. Finally, parking is not an environmental concern, therefore, no further response is necessary.
- A5-6 This comment notes the classification of Brighton Way as an alley. The DEIR already refers to this street as an alley throughout (see DEIR Page 2-1). Therefore, no further response is required. The comment also says that the alley would be used as an entrance/exit. However, the Conceptual Site Plan clearly shows the entrance and exits to the Project site are not through the alley.





## Letter A6 – Keren Hwang

Page 1 of 1

### Normandie Crossing/16911 Normandie

Keren Hwang <kerenhwang@yahoo.com>

Sun 2/18/2024 5:36 PM

To:City Council.web <CityCouncil.web@cityofgardena.org>;Amanda Acuna <AAcuna@cityofgardena.org>

Caution! This message was sent from outside your organization.

A6-1

Hello City of Gardena,

[ I am concerned about the development of the complexes on 16911 Normandie in Gardena. I understanding we need housing and I am concerned about increased traffic on Normandie which is only 2 lanes.] [However, I don't understand why the buildings need to be such a behemoth. 7 stories high?! Are there any buildings in Gardena and/or surrounding cities with over 3 stories high? There should be a law against building so high in this neighborhood.] [And let's not forget we still have earthquakes.]

A6-2

A6-3

I oppose building something so high in Gardena.

Thank you.  
Keren Hwang  
Home Owner in Gardena, CA.



## RESPONSE TO COMMENT LETTER NO. A6

Keren Hwang, Resident

February 18, 2024

- A6-1 This comment states concern over traffic on South Normandie Avenue. As shown in **DEIR Appendix 4.13-2** Table 7, all intersections operate at acceptable levels of service except for the South Normandie Avenue at West 169<sup>th</sup> Street intersection. It is typical for minor street stop-controlled intersections to operate at lower levels of service. The commenter incorrectly states that South Normandie Avenue is two lanes. South Normandie Avenue is a four-lane street with left turn pockets to turn west at West 169<sup>th</sup> Street and to turn east at West 170<sup>th</sup> Street.
- A6-2 This comment states concern over the apartment building height. A building of similar height is under construction at 12850 Crenshaw Boulevard, at the City's northwestern extent. Given the blighted condition of the existing site, redevelopment would improve the site's visual condition. Additionally, the Project's building heights would be consistent with the development standards in the proposed Normandie Crossing Specific Plan. For further discussion on building height, see Response A8-1.
- A6-3 This comment states concern over earthquakes. As discussed in **DEIR Section 7**, the Project site is not within an Alquist-Priolo fault zone. Additionally, Project's Preliminary Geotechnical Investigation; see **DEIR Appendix 4.4-1: Preliminary Geotechnical Investigation**) was prepared and found that risk of surface fault rupture was low. The geotechnical report contains recommendations which the Applicant is required to follow in accordance with GMC § 18.42.200A. Therefore, no impact would occur and no mitigation was required.



## Letter A7 – Kevin Collier

### Page 1 of 1

**From:** Kevin Collier <[kevin.collier@envieta.com](mailto:kevin.collier@envieta.com)>  
**Sent:** Thursday, February 1, 2024 9:18 AM  
**To:** Amanda Acuna <[AAcuna@cityofgardena.org](mailto:AAcuna@cityofgardena.org)>  
**Subject:** Comments on Normandie Crossing Specific Plan

Caution! This message was sent from outside your organization.

Please clarify the details regarding EV charging parking spaces. The Draft EIR states that there are 40 vehicle charging spaces. The EIR also states that regulations require 10% of parking stalls to be EV capable, 25% to be EV ready, and 5% to be equipped with Level 2 EV chargers. Please clarify if the 40 spaces allocated for EV charging are just EV capable, or are the planned to have chargers installed and available.

A7-1

Please clarify the detailed information in the EIR regarding the number of parking spaces. The EIR states 195 spaces are provided in level 1, but lists only 135 standard spaces, 20 EV spaces, and 8 accessible spaces. The EIR states 204 spaces are provided in level 2, but lists 150 standard spaces and 20 EV spaces.

A7-2

During the Jan 31 community meeting the developers stated that parking spaces would be leased. The EIR only states that the parking spaces are not bundled with a specific apartment. The stated motivation for leasing parking spaces is to encourage the use of public transportation rather than using a personal vehicle. I am skeptical that leasing spaces would have this incentive, but rather would encourage tenants to park on surrounding streets. I think my skepticism is shared by many in the community. Please consider options to mitigate the incentive to park on local streets, such as:

A7-3

- Issue street parking permits to residents of the surrounding neighborhood.
- Provide free garage parking to apartment tenants.
- Increase the number of parking spots with installed EV chargers to encourage off-street parking for owners of EVs.

Kevin Collier



## RESPONSE TO COMMENT LETTER NO. A7

Kevin Collier, Resident

February 1, 2024

A7-1 This comment requests clarification on the electric vehicle (EV) charging provided by the Project. In conformance with the Specific Plan standards and the latest Title 24 requirements, the apartment building would provide 20 stalls with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit, raceway, and receptacles. Each townhome unit would have one EV ready space within each garage.

A7-2 This comment requests clarification on the total parking provided by the Project. The Project includes four types of parking: standard, accessible (for compliance with the Americans with Disabilities Act [ADA] requirements), EV parking as described above, and tandem parking (tandem refers to two spaces that in front of each other, rather than side by side). Each tandem space can accommodate two vehicles. The Project proposes the following parking:

- Level 1: 195 spaces, 155 of which would be standard, 8 of which would be handicapped, and 32 of which would be tandem;
- Level 2: 204 spaces, 170 of which would be standard and another 34 would be tandem. The EV spaces referred to in Response A7-1 would be spread between the two floors.

A7-3 This comment suggests alternative means to incentivize public transit. The commenter begins by suggesting issuing street parking permits to surrounding residents. The Applicant cannot issue parking permits to surrounding residents, however, this suggestion will be passed on to the City Council. Regular street parking by Project residents would also be inconvenient, as Project residents would need to carry belongings to and from the apartment component daily.

The next alternative offered is to provide free garage parking to apartment residents. Providing free garage parking to residents would not incentivize use of public transport, thus, this suggestion is not feasible. Furthermore, Assembly Bill (AB) 1317 requires all residential parking to be unbundled from rent for any residential use of 16 or more units that are issued a certificate of occupancy after January 1, 2025. The Project apartment component includes 328 units and would be issued a certificate of occupancy after January 1, 2025; thus, the Project would be required to comply with AB 1317 and prohibited from providing free garage parking.



The final alternative offered is to increase the number of EV chargers to incentivize EV owners to park off-street. As discussed in Responses A7-1 and A7-2, the Project provides EV parking, which is consistent with State regulatory requirements. As the Project does not have any significant air quality or GHG impacts, it is not necessary to install more chargers at this time to mitigate impacts. However, the comment about installing more chargers has been passed on to the Applicant.



**Letter A8 – Donnetta Jalomo**  
**Page 1 of 6**

Comment Letter 8

From: AT&T COMMUNICATIONS <demja1@sbcglobal.net>  
Sent: Wednesday, March 13, 2024 3:34 PM  
To: publiccomment@cityofgardena.org  
Subject: PLANNING COMMISSION COMMENT

Caution! This message was sent from outside your organization.

I am writing this email in protest to the proposed Project by the 16911 Normandie Associates, LLC and their ridiculous plans to build a 7 STORY APARTMENT BUILDING along with 75 THREE STORY TOWNHOME UNITS in an area that consists of a little over 5 acres.

There are red flags about the number of dwellings in such a small area as well as the fact that how can you even consider a 7 STORY APARTMENT BUILDING in an area where most of the dwellings are single family homes? Really? Is this development trying to compete with Gardena Memorial Hospital as one of the tallest buildings in Gardena? At least at the hospital there is ample parking and access for the 7 story building.

A8-1

How do the developers propose the amount of traffic, cars, access to this building which it would generate with such a monstrosity? Are they going to provide the right number of stalls per apartment for say at least two cars per unit? That would mean there are at least 600 spaces that must be available. Should I presume that the two bottom

A8-2



**Letter A8 – Donnetta Jalomo**

**Page 2 of 6**

stories are going to be set aside for parking? Then there is the issue of how to access the parking of said units. Are they proposing that the entrance be on 168th directly across from Cocoon 63? Ever since Cocoon 63 has opened the entire street area is filled with automobiles from residents even those this project included a parking structure within the complex. Apparently, most of the residents are not keen on utilizing the electronic garage as was proposed by those builders and would rather use the convenience of parking on the street (which I might add is narrow). When one turns right off Normandie onto 168th there is always a blind spot because of the sharpness of the turn and any good driver knows to take the turn slowly as you never know if a car or delivery van is blocking the street. Are they proposing that the entrance will be off the little alley way that is currently there. Nice for the people who live in the housing right next to the alley isn't it?

A8-2

As far as the proposal for the 75 THREE STORY TOWHOMES where is the entrance going to be for these dwellings? I have heard that it will be off 170th and I can assure you that once the existing neighbors along 170th as well as Brighton find out I doubt they will be happy about the amount of additional traffic they will have to endure on the daily. There is an existing light off of Normandie Avenue that could be utilized for access to this proposed townhome area and would keep most of the traffic away from the neighborhood. Anyone on the planning commission think about this?

A8-3



**Letter A8 – Donnetta Jalomo**

**Page 3 of 6**

Look, I am all for capitalism, but it always comes at a price, and I do not believe that anyone on the planning commission has thought this one totally through. If this proposed project is approved, then it NEEDS TO BE SHAVED DOWN to a reasonable size especially as most of the people who have lived in this particular residential area of Gardena have done so for 25+ years. And by residential I do mean single family dwellings with a scattering of apartments and condos but none higher than 3 stories!

A8-4

I happened to look up the LLC that is proposing this project as well as one of its applicants. Apparently one of the applicants is part of a property management company. When looking up this company I saw they offer rentals in the range of mid \$2000 to over \$4000 per month! When the Cocoon was first on the books it was touted as an affordable place to live but as the actual facts were finally placed on the table, they were small 300 to 450 square foot units that range in price from \$1900 to \$2000 per month! Doesn't sound too reasonable to me. Now there are the Townhomes being finished off Normandie Avenue just south of Redondo that apparently have already sold out. That too was touted as affordable and yet those units, narrow and 3 stories high were selling in the mid \$700k's. How can the City of Gardena say that this type of residential growth is affordable?

A8-5

I also noticed a sentence in the

A8-6





**Letter A8 – Donnetta Jalomo**

**Page 4 of 6**

proposed project about the creation of condominiums as well. Think people THINK. The area this proposed project is considering already has been impacted by the growth of the townhomes on Western north of the Albertsons shopping center as well as the Cocoon apartments. We have traffic in the area when there is a traffic jam at the corner of Western and Artesia as well as when the train blocks Western Avenue at the Crenshaw Lumber facility.

A8-6

I live on the corner of 169th Place and Denker and I invite anyone on the commission to sit on my front porch around commute time am and pm or when there is a traffic jam or accident or when the train blocks Western Avenue to hear and count just how many cars utilize the neighborhood as a detour. It is not peaceful nor tranquil to hear. I can only imagine how the residents on 170th as well as those living on Dalton are going to feel about the additional and excessive noise level that will manifest if you allow this project to commence as it currently is.

Why is the planning commission trying to make the

A8-7



**Letter A8 – Donnetta Jalomo**

**Page 5 of 6**

City of Gardena look like the City of Carson along Carson Blvd or Avalon Blvd? Why is the planning commission trying to make the City of Gardena look like the City of Torrance along Crenshaw near Wilson Park? You do realize that both of those areas I just mentioned have way too much traffic in both the morning and afternoon hours because of the density of housing in the area.

A8-7

I would hope that most of my fellow neighbors will attend the meeting this coming Tuesday, March 19 at 7:00 pm to voice their concerns but more so I hope that the planning commission will be cognizant of their concerns and LISTEN TO THEIR CONSTITUENTS. Last time I checked we are still living in a democracy (little d) where voices are heard, and ideas considered and placed on the table. Until we live in an Autocracy which could be a reality unless Americans wake up, I hope that the planning commission as well as the city council will listen to their constituents.

A8-8

We are all in this together to come to a consensus of what the surrounding neighborhood can withstand and accept. A SEVEN STORY APARTMENT BUILDING AND 75 TOWNHOMES and possible condominiums in such a SMALL



**Letter A8 – Donnetta Jalomo**  
**Page 6 of 6**

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AREA OF 5 ACRES is not the answer.

A8-8

Thank you,  
Donnetta Jalomo



## RESPONSE TO COMMENT LETTER NO. A8

Donnetta Jalomo, Resident

March 13, 2024

A8-1 This comment questions the Project’s compatibility with the existing surrounding uses concerning the development’s density and apartment building’s height.

The Project site would be developed at a density of approximately 77 dwelling unit per acre (DU/AC). Higher density residential uses were already anticipated for the northerly portion of the Project, which is designated High Density 30 Overlay and zoned Housing Overlay 4 (HO-4), allowing 21-30 dwelling unit per acre (DU/AC). The Project would remove six circa 1952-1979 industrial buildings, which are in a blighted condition, and fully improve a property that is currently inadequately maintained and devoid of landscaping with residential uses and landscaping. The Project would also comply with City Policy DS 2.7, which requires appropriate setbacks, massing, articulation, and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing. The apartment building’s design and access is oriented towards Normandie Avenue and away from the nearest single-family housing located to the south and west of the Project site. Further, the Project appropriately transitions building massing from a single- to multi-family scale by locating the townhomes along the Project boundary that borders single-family housing (south and west) and the apartment building near the multi-family apartments (north) and Normandie Avenue (east). Additionally, the Project’s building heights would be consistent with the development standards in the proposed Normandie Crossing Specific Plan. This comment does not address DEIR’s adequacy or raise a significant environmental issue.

Additionally, in response to community feedback, the “Community Input” Alternative, which would reduce the apartment building height from seven to five above ground stories, has been analyzed in **DEIR Section 6.0: Alternatives**; see **FEIR Section 3.0: Errata to the Draft EIR** for a complete description of the Community Input Alternative.

This comment also suggests that the proposed Project does not provide adequate parking spaces and requests clarification about access to the parking areas. Parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR’s adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, as noted in **DEIR Section 2.0: Project Description**, the Project proposes 399 parking spaces for the apartment building and 160 parking spaces for the townhomes. Additionally, the Project further promotes use of multi-modal transportation networks through its proximity to such networks. The



Project site is less than one mile from five different bus routes and the Harbor Gateway Transit Center; see **DEIR Section 4.13: Transportation**. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9-mile to the south, providing more access to public transit opportunities. The Project would also implement TDM strategies such as unbundled parking, additional bicycle parking, and a one-month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees. These strategies provide alternative transportation options, reducing parking demand. Given these factors, it is not anticipated that Project residents would park on surrounding streets.

Concerning access to the Project, vehicular access to the proposed Project site would be provided by the following four driveways:

- Driveway 1 would serve Subarea A and provide access to the apartment building's parking garage from 169<sup>th</sup> Street west of South Normandie Avenue.
- Driveway 2 would serve Subarea A and provide a right-in/right-out only driveway that would also serve the apartment building's parking garage from southbound South Normandie Avenue.
- Driveway 3 would serve Subarea B and provide access to the townhomes from 170<sup>th</sup> Street. This driveway would also serve as fire truck access for both Subareas A and B.
- Driveway 4 would serve Subarea B and provide access to the townhomes from 169<sup>th</sup> Street. This driveway would also serve as fire truck access for both Subareas A and B.

There would be adequate access to the Project's parking areas. Therefore, this comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-2 This comment expresses concern about the Project's proposed parking areas and requests clarification if there would be two parking spaces per unit and where parking would be located. As noted above in Response A8-1, parking is not considered an environmental issue per CEQA, and this comment does not address the DEIR's



adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, the Project proposes 399 parking spaces for the apartment building and 160 parking spaces for the townhomes. Parking for the apartment complex is proposed to be in the apartment building's first two levels. Parking for the townhomes would be in attached garages and would have an additional 10 surface parking spaces for guests.

This comment also requests clarification about the Project's driveways and whether there would be an entrance point on 168<sup>th</sup> Street and Brighton Way. As shown on **DEIR Exhibit 2-4: Conceptual Site Plan**, no driveways or access points for the proposed Project are proposed on 168<sup>th</sup> Street or on Brighton Way. Vehicular access to the proposed Project site is described in Response A8-1. As described in Response A8-1, there would be a proposed access driveway for the Apartment building's parking garage from 169<sup>th</sup> Street west of South Normandie which is located across the street from the multifamily development located at 16819 Normandie Avenue. The commenter notes that the multifamily development located at 16819 Normandie Avenue utilizes parking on the local streets to avoid utilizing the electronic garage. Parking is not an environmental issue pursuant to CEQA, as such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion concerning parking. All roadway and driveway improvements would be constructed pursuant to Los Angeles County Fire Department requirements. Therefore, this comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

- A8-3 This comment requests clarification about the access driveways for the proposed townhomes and whether they would be located on 170<sup>th</sup> Street. The comment also suggests that access to the proposed townhomes should utilize the existing signal at Normandie Avenue to reduce traffic impacts in the neighborhood. As mentioned above in Response A8-2, Driveway 3 would provide access to the townhomes from 170<sup>th</sup> Street and Driveway 4 would provide access to the townhomes from 169<sup>th</sup> Street. No access to the townhomes is proposed on Normandie Avenue near the existing signal, however, an access driveway to the proposed apartment building is proposed on Normandie Avenue. The apartment building would utilize the driveway at Normandie Avenue to access the parking lot rather than using the other Project access points. Finally, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, the Project has been designed to minimize traffic through TDM strategies and ITS applications. These include features such as unbundled parking, additional bicycle parking, and a one-



month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-4 This comment expresses concern about neighborhood compatibility and suggests that residential developments be limited to three stories high. Please refer to Response A8-1 concerning neighborhood compatibility and Project building height. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-5 This comment discusses housing affordability and expresses dissatisfaction with the high rental prices at nearby developments. As this comment does not address the adequacy of the EIR or raise a significant environmental issue, no further response is required.

A8-6 This comment expresses dissatisfaction with current traffic congestion in the Project area and concern that the Project would worsen traffic conditions. As mentioned above in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Also, the Project has been designed to minimize traffic through TDM strategies and ITS applications. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

This comment also expresses concern about mobile source noise generated by Project traffic. As noted in **DEIR Section 4.9: Noise**, Project traffic would result in a maximum noise level increase of 1.8 dBA CNEL along West 170<sup>th</sup> Street (west of Normandie Avenue). In addition, the estimated noise level increases along Normandie Avenue and West 169<sup>th</sup> Street (west of Normandie Avenue) would be 0.2 dBA CNEL and 0.3 dBA CNEL, respectively. As previously noted, a 3-dBA increase is considered a "barely perceptible" difference (i.e., the change in noise is perceived but does not cause a human response). As such, the Project's estimated traffic noise level increases are considered negligible. The comment does not address the DEIR's adequacy or provide any evidence to support the assertion of additional and excessive noise.

A8-7 This comment expresses concern that the Project would increase housing density in Gardena and result in traffic congestion similar to the neighboring cities of Carson and Torrance. Please refer to Response A8-3 for a discussion concerning traffic congestion.



This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A8-8 This comment notes its opposition to the Project and encourages the public and lead agency to oppose it as well. This comment is noted, and no further response is required.





**Letter A9 – Kevin Collier**  
**Page 1 of 2**

**Comment Letter 9**

**From:** [kitdcollier@aol.com](mailto:kitdcollier@aol.com) <[kitdcollier@aol.com](mailto:kitdcollier@aol.com)>  
**Sent:** Thursday, March 14, 2024 12:48 PM  
**To:** Public Comment <[publiccomment@cityofgardena.org](mailto:publiccomment@cityofgardena.org)>  
**Subject:** PLANNING COMMISSION COMMENT

Caution! This message was sent from outside your organization.

I oppose the Normandie Crossing Specific Plan as currently defined. My objection concerns the density of the apartment component and its impact on on-street parking and traffic congestion. Please consider the "Reduced Density" alternative described in the Draft Environmental Impact Report.

A9-1

During the Jan 31 community meeting the developers stated that parking spaces would be leased. I am concerned that leasing spaces would discourage renters from using the parking garage, and rather provide an incentive to park on the street. There is very limited street parking surrounding the proposed development.

A9-2

Please clarify how leased parking is consistent with Gardena Climate Action Plan's Policy LUT E2 - "unbundle parking and eliminate assignment of specific stalls."

A9-3

I am skeptical that the number of parking spaces, and the plan to lease the spaces, does not conflict with the General Plan policy LU 1.5, specifically the policy of providing adequate off-street parking. The EIR states that the project does not conflict with the General Plan policy C1.11 since "providing less parking spaces per unit encourages residents to carpool or seek alternative modes of transportation." I am concerned that rather than encouraging alternative modes of transportation the project will encourage more on-street parking in an area that is already lacking adequate on-street parking.

A9-4

I am extremely skeptical that a traffic study performed in March 2022 reflects current traffic conditions. March 2022 was just two months after LAUSD reopened, and just nine months after LA county reopened. Traffic did not immediately return to "normal" levels, but rather very slowly increased to current levels.

A9-5

Since Gardena is obligated to make progress towards its RHNA obligations, please consider the "Reduced Density" alternative described in the Draft Environmental Impact Report. Though this is a "Reduced Density" alternative, the density is still a high density project. The density of 51 du/ac would put the project in the highest Housing Overlay category, HO-06, as defined by the Gardena 2021-2029 Housing Element plan. There is already a completed HO-06 development adjacent to the proposed project (16819 Normandie with a density of 57 du/ac). I am opposed to

A9-6



## Letter A9 – Kevin Collier

### Page 2 of 2

adding a development with a density of 77 du/ac adjacent to an existing development with a density of 57 du/ac.

A9-6

If some development must be approved to make progress towards the RHNA obligations, please consider requiring developer to provide more than 20 parking spots installed with EV chargers, and require the developer to provide more than just 20 additional spots that are EV Ready. Perhaps providing EV chargers will provide an incentive to use the parking garage as we transition to more electric vehicles.

A9-7

Thank you,  
Kevin Collier  
1332 W 169th Pl, Gardena 90247



## RESPONSE TO COMMENT LETTER NO. A9

Kevin Collier, Resident

March 14, 2024

A9-1 This comment notes its opposition to the Project due to its density and the resulting potential impacts on local street parking and traffic congestion. This comment also notes its support of the Reduced Density Alternative. Please refer to Response A8-1 for a discussion concerning Project density. Regarding parking, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion concerning parking. Finally, please refer to Response A8-3 for a discussion concerning traffic congestion.

A9-2 This comment expresses concern regarding a statement made at the January 31, 2024 community meeting regarding leasing parking spaces and how this could potentially lead to Project tenants parking in the surrounding streets. Parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, Assembly Bill (AB) 1317 requires all residential parking to be unbundled from rent for any residential use of 16 or more units that are issued a certificate of occupancy after January 1, 2025 in Los Angeles County. The proposed apartment building includes 328 units and would be issued a certificate of occupancy after January 1, 2025. Therefore, pursuant to AB 1317 requirements, the proposed Project would not provide free garage parking. As noted above in Response A9-1, it is not anticipated that Project residents would park on surrounding streets.

A9-3 This comment requests clarification for Project consistency with Gardena Climate Action Plan Policy LUT E2. Gardena Climate Action Plan Policy LUT E2 is as follows:

**Measure LUT: E2 – Unbundle Parking Costs From Property Costs.** Unbundling separates parking from property costs, allowing individuals who wish to purchase parking spaces to do so and those that don't, to save money. Parking can be priced separately from home rents/purchase prices or office leases. This measure can help reduce the number of vehicles per household.

Refer to Response A9-2 for a discussion concerning unbundled parking. Therefore, the project would be consistent with Gardena Climate Action Plan Policy LUT E2 by providing unbundled parking. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.



- A9-4 This comment questions the Project’s consistency with General Plan Policy LU 1.5 stating that rather than encourage alternative transit modes, the Project would encourage on-street parking. As stated in **DEIR Table 4.8-4: Gardena General Plan 2006 Analysis**, the Project would not conflict with General Plan Policy LU 1.5 as it would provide adequate residential amenities including off-street parking (i.e., approximately 399 off-street vehicle and 173 bicycle parking spaces). The parking proposed by the Project is consistent with the Normandie Crossing Specific Plan but less than the City’s parking requirements, providing 1.2 parking spaces per apartment unit. Refer to Response A8-1 for a discussion concerning parking demand. Further, new residents who sign a 12-month lease would be offered one free monthly Metro pass. This comment does not address the DEIR’s adequacy or raise a significant environmental issue and no further response is required.
- A9-5 This comment questions the adequacy of the Project’s traffic study (**DEIR Appendix 4.13-2: Local Transportation Assessment**) and claims the study date is not representative of typical traffic conditions. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by “level of service” (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).) Notwithstanding, the analysis of existing traffic conditions in **Appendix 4.13-2** was based on 2022 intersection traffic counts. As stated in **Appendix 4.13-2**, the analysis assumes that traffic levels around the Los Angeles region that were affected by the COVID-19 Pandemic stabilized in 2022 since schools resumed in-person instruction and remaining restrictions were lifted. Although the COVID-19 Pandemic resulted in both temporary and permanent shifts in traffic patterns, pandemic-related restrictions that could affect travel largely expired/stabilized in 2022. Therefore, the traffic counts that were collected are considered adequate and appropriate for use in the Project’s analysis. No further response is required.
- A9-6 This comment expresses support for the Reduced Density Alternative. This comment is noted, and no further response is required.
- A9-7 This comment requests that the City require the Applicant to provide more than 20 EV charging stalls and more than 20 EV ready charging stalls to encourage Project tenants to use parking spaces in the garage rather than street parking. The Project complies with the Normandie Crossing Specific Plan standards and the latest Title 24 requirements regarding EV parking spaces. The apartment building would provide 20 stalls with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit,



raceway, and receptacles. Each townhome would have one EV ready space within each garage. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.



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**Comment Letter 10**



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**VIA E-MAIL**

March 18, 2024

Amanda Acuna, Senior Planner  
City of Gardena  
1700 West 162<sup>nd</sup> Street  
Gardena, CA 90247  
Em: [aacuna@cityofgardena.org](mailto:aacuna@cityofgardena.org)

**RE: Western States Regional Council of Carpenters’ Comments  
Regarding the City of Gardena’s Planning Commission Review of  
the Normandie Crossing Specific Plan Project and Draft  
Environmental Impact Report**

Dear Amanda Acuna,

On behalf of the Western States Regional Council of Carpenters (“Western Carpenters” or “WSRCC”), my Office is submitting these comments for the City of Gardena’s (“City”) Draft Environmental Impact Report (“DEIR” or “Draft EIR”) for the Normandie Crossing Specific Plan (“SP”) Project (“Project”), SCH No. 2023050241.

According to the DEIR:

The Project proposes to establish a maximum allowable development within the approximately 5.25-acre [Normandie Crossing Specific Plan (“NCSP”)] area of up to 403 DU. Because the City does not have any zone which would accommodate the proposed development, the Applicant is proposing the NCSP, which would establish the site-specific zoning regulations and development standards for this area. The NCSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. In addition to requiring a Specific Plan, the Project requires various other approvals, including a Development Agreement

**A10-1**



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(DEIR, p. 2-11.)

The Western Carpenters is a labor union representing roughly 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects. Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the SP’s environmental impacts.

A10-1

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the SP, and at any later hearing and proceeding related to this SP. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

A10-2

The Western Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the SP. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, the Western Carpenters requests that the City provide notice for all notices referring or related to the SP issued under the California Environmental Quality Act (CEQA) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law (“Planning and Zoning Law”) (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

A10-3

**I. THE CITY SHOULD INCORPORATE LANGUAGE THAT REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY’S ECONOMIC DEVELOPMENT AND ENVIRONMENT.**

The City should incorporate language into the proposed SP requiring residential, commercial and mixed-use developments within the SP area to be built using local workers who have graduated from a Joint Labor-Management Apprenticeship

A10-4



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Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program.

A10-4

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the SP. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of projects within the SP area can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

A10-5

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

A10-6

[L]abor should be considered an investment rather than a cost and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.<sup>1</sup>

Furthermore, workforce policies have significant environmental benefits given that they improve an area’s jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a

A10-7

<sup>1</sup> California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, available at <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>





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local state-certified apprenticeship program” can result in air pollutant reductions.<sup>2</sup>  
Locating jobs closer to residential areas can have significant environmental benefits.  
As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.<sup>3</sup>

A10-7

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.<sup>4</sup> Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about

A10-8

<sup>2</sup> South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, available at <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>.

<sup>3</sup> California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, available at <https://cprroundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

<sup>4</sup> Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, available at <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.



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negotiating corporate participation in First Source as a condition of approval for development permits.

A10-8

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 (“AB2011”). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

A10-9

The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

**II. THE CITY SHOULD INCORPORATE LANGUAGE IMPOSING TRAINING REQUIREMENTS FOR CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES INTO THE GP.**

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupational Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.<sup>5</sup>

Western Carpenters recommend that the City adopt additional requirements to mitigate public health risks from various residential, commercial and mixed-use development construction activities. Western Carpenters requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on residential, commercial and mixed-use developments within the SP area.

A10-10

In particular, based upon Western Carpenters’ experience with safe construction site work practices, Western Carpenters recommends that the City require that while construction activities are being conducted within the SP area (“Project Site”):

**Construction Site Design:**

<sup>5</sup> Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, available at <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.



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- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

**Testing Procedures:**

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue

A10-10



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to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

**Planning**

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.<sup>6</sup>

A10-10

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

Western Carpenters has also developed a rigorous Infection Control Risk Assessment

<sup>6</sup> See also The Center for Construction Research and Training, North America’s Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, available at [https://www.cpwr.com/sites/default/files/NABTU\\_CPWR\\_Standards\\_COVID-19.pdf](https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf); Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at [https://dpw.lacounty.gov/building-and-safety/docs/pw\\_guidelines-construction-sites.pdf](https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf).



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(“ICRA”) training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.<sup>7</sup>

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The City should incorporate language requiring the residential developments related to the SP be built using a workforce trained in ICRA protocols.

A10-10

**III. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.**

**A. Background Concerning the California Environmental Quality Act**

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations (“CEQA Guidelines”), § 15002, subd. (a)(1).<sup>8</sup> At its core, its purpose is to “inform the public and its responsible officials of the environmental consequences of their decisions *before they are made.*” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

**1. Background Concerning Environmental Impact Reports**

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify

A10-11

<sup>7</sup> For details concerning Western Carpenters’ ICRA training program, see <https://icrahealthcare.com/>.

<sup>8</sup> The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Cal. Pub. Res. Code, § 21083. The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.



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ways that environmental damage can be avoided or significantly reduced.” CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subs. (b)(2)(A)-(B).

While the courts review an EIR using an ‘abuse of discretion’ standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the court stated in *Berkeley Jets*, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

A10-11

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the “fair argument” standard under which an EIR must be prepared whenever substantial evidence in the record supports



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a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of "B" St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that "may have a significant effect on the environment." PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

"Significant effect upon the environment" is defined as "a substantial or potentially substantial adverse change in the environment." PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a "low threshold" for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of*

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*Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of “B” St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1).

A10-11

**B. The Project May Have a Significant Hazards Impact**

The Project may have a significant hazards impact. The DEIR provides two Phase I Environmental Site Assessments (“ESA” or “Phase I ESA”) prepared by Partner Engineering and Science, Inc., with a January 7, 2021 ESA included in Appendix 4.6-2 concerning the Project Site’s *southern* portion (APN 6106-030-017) (“South Phase I ESA”), and a July 13, 2021 ESA included in Appendix 4.6-1 concerning the Project Site’s *northern* portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016) (“North Phase I ESA”). (DEIR, 4.6-1.) However, the Phase I ESAs are outdated and manifestly incomplete.

1. *Background on Phase I, II, and III Environmental Site Assessments*

The preparation of a Phase I ESA is “to research the current and historical uses of a property as part of a commercial real estate transaction” and “to assess if current or historical property uses have impacted the soil or groundwater beneath the property and could pose a threat to the environment and/or human health.”<sup>9</sup>

A10-12

As explained by experts in the field of ESA:

The primary difference between Phase I and Phase II site assessment lies in the scopes of work of the assessment. A Phase I primarily assesses the likelihood that a site is contaminated through visual observations, historical use reviews and regulatory records, while a Phase II assesses whether contamination is in fact present. Here are the components of each.

**Phase I Environmental Site Assessment**

Review of records, to discover whether the site has been used for potentially hazardous purposes in the past.

<sup>9</sup> Jenny Redlin, REPA, Partner Engineering and Science, Inc., *What is a Phase I Environmental Site Assessment* (Apr. 9, 2018), available at <https://www.partneresi.com/resources/articles/what-is-a-phase-i-environmental-site-assessment/#:~:text=A%20Phase%20I%20Environmental%20Site%20Assessment%20%20commonly%20referred%20to%20as,a%20commercial%20real%20estate%20transacti on.> (accessed on Jan. 18, 2024).





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Visual inspection of the property’s current condition, with comparison to site plans.

Visual inspection of adjoining properties.

Interviews with current property owners, operators, occupants, and local government officials.

Goal: Assess likelihood that property has been contaminated.

**Phase II Environmental Site Assessment**

Soil and water sampling for signs of contamination.

Comparison of lab results with local, state, and federal regulatory guidelines.

May include inspection of interior spaces for mold, radon, or lead paint.

May include identification of wetlands, ecological resources, or endangered species that may prevent certain land uses.

Goal: Assess actual presence of environmental contaminants.

**Phase III Site Assessment**

A Phase III Site Assessment is called for only when contamination has been identified. A Phase III Assessment determines the extent of the contamination, both horizontally and vertically, and forms the basis for preparing a remediation plan, and estimation of the cost for remediation. Buyers and lenders use the Phase III Assessment as a negotiating tool with the sellers to ensure the property they purchase yields the benefit they expect.<sup>10</sup>

Standards for performing a Phase I ESA have been established by the US Environmental Protection Agency (“EPA”) and the American Society for Testing and Materials Standards (“ASTM”).<sup>11</sup>

A10-12

2. *The Phase I ESAs are Inadequate and Outdated*

<sup>10</sup> Robert B. Greene, Phase I versus Phase II Environmental Site Assessment available at <https://www.gleassociates.com/phase-i-versus-phase-ii-environmental-site-assessments/> (accessed on Jan. 18, 2024.)

<sup>11</sup> See, <https://www.astm.org/e1527-21.html> (last updated on Dec. 21, 2021.)



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As a preliminary matter, the Phase I ESAs were prepared in January and July of 2021, approximately three (3) years ago. In addition, given that the conditions of the Project Site and its surrounding area may have changed since 2021, the ESAs are now outdated.

Even further, and as detailed further below, the ESAs were conducted in 2021, which was prior to the EPA’s subsequent adoption of the newer ASTM E1527-21 (“ASTM E1527-21”), thereby replacing the older and less stringent ASTM E1527-13 (“ASTM E1527-13”). Accordingly, the Phase I ESAs rely upon E1527-13 (DEIR Appendix 4.6-1, p. 4, Appendix 4.6-2, p. 3). However, it is critical that the Phase I ESAs implement the newer ASTM E1527-13 standard for identifying Recognized Environmental Conditions (“REC”), as discussed further below.

Therefore, the DEIR must be revised and recirculated to include new Phase I ESAs and, moreover, a new Phase II ESA, that adequately evaluate the Project’s potential hazards impact and that apply the more recent and more stringent E1527-21 standard.

*3. The Phase I ESA Improperly Relies on ASTM 1527-13 While the EPA Recently Adopted and Validated ASTM 1527-21*

A10-13

As noted above, the Phase I ESAs are incomplete and inaccurate for purposes of CEQA because they only use the obsolete ASTM E1527-13, while the nonprofit organization ASTM International, founded as the American Society for Testing and Materials, has long adopted its more stringent ASTM Standard Practice E1527-21, which is in fact more rigorous than its predecessor E1527-13. Because Phase I ESAs rely upon the E1527-13 methodology recommended by ASTM International to identify Recognized Environmental Conditions in connection with the Project Site, they fail to adequately disclose the potential RECs on the Project Site and, as related, the Project-specific potential hazards and hazardous impacts and adverse impacts on human beings.

Specifically,

- “Under ASTM E1527-13, a REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.



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- Under ASTM E1527-21, a REC means (1) the presence of hazardous substances or petroleum due to a release to the environment; (2) the *likely* presence of hazardous substances or petroleum products due to a *likely* release to the environment; or (3) the presence of hazardous substances or petroleum products under conditions that pose a material threat of a future release to the environment. Further, the new standard provides clarifying discussion notes and examples to assist the environmental professional in applying the definition. Together, the new definition and interpretations direct a consultant to rely on the environmental professional’s experience regarding the *likelihood* of certain conditions resulting in releases, such as the long term operation of a dry cleaner, instead of discounting that professional experience based on the lack of current “indications of a release.”<sup>12</sup> (ital. original, bold emphasis added.)

Accordingly, as shown above in the E1527-21 definition of a REC, the use of phrases, “likely presence” or “likely release” are more stringent than the REC definition in E1527-13, which leaves out the potential impact for purposes of CEQA. The newer E1527-21, on the other hand, encompasses those concerns. Since the Phase I ESAs do not implement E1527-21, they could fail to account for other potential RECs at the Project Site.

A10-13

Here, for example, the North Phase I ESA directly admits the Project Site is currently occupied by three (3) buildings, Buildings A-C, which were constructed in 1963, 1978, and 1957, respectively (DEIR Appendix 4.6-1, p. ii.) and that, based on the historical and regulatory sources, the property was occupied by “various light-industrial tenants,” which included “two machine shops, an auto body repair operation, an engine repair business (FM Engine), a cabinet maker, and several manufacturing entities, all operations that would have used or stored hazardous substances.” (*Id.* at p. iii.) The North Phase I ESA further notes that because some of the manufacturing tenant listings predated 1980, there is no documentation regarding “historical hazardous substance use, storage, or disposal practices.” (*Id.*) The North Phase I ESA

<sup>12</sup> Quarles, *EPA Approves ASTM E1527-21 Phase I ESA Standard for All Appropriate Inquiry* (Mar. 29, 2022), available at <https://www.quarles.com/publications/epa-approves-astm-e1527-21-phase-i-esa-standard-for-all-appropriate-inquiry/> (accessed on Jan. 18, 2024.)



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even further notes that there were some paint booths historically identified in connection with prior tenants and usage of solvents. (Id.)

Finally, the North Phase I ESA concludes that

Partner understands the subject property is planned for residential redevelopment. Based on the plan to redevelop this site with a sensitive receptor (i.e. residential), the long-term duration of use/occupancy by businesses that used, stored and disposed of hazardous substances (60+ years), and lack of any subsurface data, the long-term light-industrial usage of the subject property is considered to be a REC.

A10-13

(Appendix 4.6-1, *supra*.)

Therefore, the North Phase I ESA identifies a REC at the Project Site and acknowledges that there will be residential use at the Project Site. Accordingly, it is imperative that the City adequately addresses this in the EIR and mitigates the significant hazards impacts. As such, the DEIR should be revised and recirculated to include updated Phase I ESAs using the more stringent ASTM E1527-21 standard to account for any other potential RECs at the Project Site that might not have been accounted for under the previous ASTM E1527-13 standard.

4. *The Project May Have Significant Hazards Impacts, as Well as Adverse Impacts on Human Beings Requiring Mandatory Findings of Significance*

Under CEQA Guidelines section 15065, subdivision (a)(1)(4), a lead agency “shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where [...] (4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.”

A10-14

The North Phase I ESA expressly confirms that, due to the age of the buildings situated on the Project Site, there is potential for the presence of asbestos-containing materials (“ACM”) and/or lead-based paint (“LBP”) (DEIR Appendix 4.6-1, p. iv.)

It is undisputed that both *lead* and *asbestos* are dangerous to people’s health. While intact asbestos by itself may not be hazardous, damaged or disturbed asbestos may



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release asbestos fibers and become a health hazard.<sup>13</sup> Per Occupational Health and Safety Administration’s (“OSHA”) description:

**What are the hazards of asbestos?**

Asbestos is well recognized as a health hazard and its use is now highly regulated by both OSHA and EPA. Asbestos fibers associated with these health risks are too small to be seen with the naked eye. Breathing asbestos fibers can cause a buildup of scar-like tissue in the lungs called asbestosis and result in loss of lung function that often progresses to disability and death. Asbestos also causes cancer of the lung and other diseases such as mesothelioma of the pleura which is a fatal malignant tumor of the membrane lining the cavity of the lung or stomach. Epidemiologic evidence has increasingly shown that all asbestos fiber types, including the most commonly used form of asbestos, chrysotile, causes mesothelioma in humans.

OSHA’s Definition of “Asbestos” on its Official Website.<sup>14</sup>

A10-14

Similarly, *lead* is dangerous to people and their families. Per OSHA’s report:

Lead has been poisoning workers for thousands of years. Lead can damage the central nervous system, cardiovascular system, reproductive system, hematological system, and kidneys. When absorbed into the body in high enough doses, lead can be toxic.

In addition, workers’ lead exposure can harm their children’s development. Short-term (acute) overexposure—as short as days—can cause acute encephalopathy, a condition affecting the brain that develops quickly into seizures, coma, and death from cardiorespiratory arrest.

Short-term occupational exposures of this type are highly unusual but not impossible. Extended, long-term (chronic) overexposure can result in severe damage to the central nervous system, particularly the brain. It can also damage the blood-forming, urinary, and reproductive systems. There is no sharp dividing line between rapidly developing acute effects of lead

<sup>13</sup> See, <https://www.epsc.gov/safety-education/safety-guides/home/asbestos-home>; see also, medical conditions associated with asbestos: [https://www.atsdr.cdc.gov/asbestos/health\\_effects\\_asbestos.html](https://www.atsdr.cdc.gov/asbestos/health_effects_asbestos.html)

<sup>14</sup> See, United States Department of Labor, *Asbestos*, available at <https://www.osha.gov/asbestos> (accessed on Jan. 18, 2024.)



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and chronic effects that take longer to develop.<sup>15</sup>

OSHA also documents the adverse effects of lead on people’s reproductive health:

**REPRODUCTIVE RISKS**

Lead is toxic to both male and female reproductive systems. Lead can alter the structure of sperm cells and there is evidence of miscarriage and stillbirth in women exposed to lead or whose partners have been exposed. Children born to parents who were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.

Workers who desire medical advice about reproductive issues related to lead should contact qualified medical personnel to arrange for a job evaluation and medical followup--particularly if they are pregnant or actively seeking to have a child. Employers whose employees may be exposed to lead and who have been contacted by employees with concerns about reproductive issues must make medical examinations and consultations available.<sup>16</sup>

A10-14

Therefore, the Project may also cause a significant hazard impact due to the demolition hazards, including impacts to human beings and sensitive receptors, air, and water quality. Thus, under CEQA Guidelines section 15065(a)(1)(4), the City shall make mandatory findings of significance and order that the EIR be revised and recirculated to thoroughly assess the potential hazards impact of the Project and its required demolition activities and potential handling of asbestos and lead-based paint and mitigate those impacts to a level of insignificance.

**C. The Project May Have a Significant Noise Impact**

There is substantial evidence the Project will have a significant noise impact. The DEIR directly admits that “[t]he Project’s construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning equipment and a temporary noise barrier . . .” (DEIR, p. 6-19.) The DEIR further proposes various noise mitigation measures, including implementation of a temporary and impermeable sound barrier of ten feet (10) high with a minimum 12dBA noise

A10-15

<sup>15</sup> See, OSHA Report, *Lead in Construction* (2004) p. 3, available at <https://www.osha.gov/sites/default/files/publications/osha3142.pdf> (accessed on Jan. 18, 2024.)

<sup>16</sup> *Id.* at p. 4.



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reduction and minimum Sound Transmission Class rating of STC-25, along with use of large brass construction equipment a minimum of forty-five (45) feet away from the off-site residence adjacent to the Project Site (i.e. MM NOI-1 and MM NOI-2), however, the DEIR still concludes that even with implementation of the noise mitigation measures, there will be a significant and unavoidable impact. (*Id.* at ES-16.) However, given that the DEIR identifies numerous noise-sensitive receptors near the Project Site, including the residential uses to the north, south, and west, it is imperative that the City require further mitigation be implemented to reduce the impacts to a level of insignificance.

A10-15

Accordingly, the City should require that the DEIR be revised and recirculated to adequately mitigate the Project’s significant noise impacts.

**IV. CONCLUSION**

Based on the foregoing, the City should require that the DEIR be revised and recirculated pursuant to CEQA to address the comments and issues identified in this letter. Similarly, the City should require additional environmental studies be performed to comply with CEQA and other state laws.

A10-16

Sincerely,

Mitchell M. Tsai  
Attorneys for Western States Regional Council of Carpenters

Attached:

March 8, 2021, SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

A10-17



**RESPONSE TO COMMENT LETTER NO. A10**

Mitchell M. Tsai , Attorney  
Western States Regional Council of Carpenters  
March 18, 2024

A10-1

Thru

A10-17 This comment letter is a duplicate of Comment Letter No. A4 written on behalf of the Western States Regional Council of Carpenters. For responses to A10-1 through A10-17, please refer to Responses A4-1 through A4-17 above.





**Letter A11 – Brenda Rodriguez**  
**Page 1 of 2**

Comment Letter 11

**From:** Brenda Rodriguez <brodriguez051687@gmail.com>  
**Sent:** Tuesday, March 19, 2024 12:50 PM  
**To:** publiccomment@cityofgardena.org  
**Subject:** Planning Commission Comment

Caution! This message was sent from outside your organization.

To whom it may concern,

I am writing to express my strong objection to the construction of apartments in our neighborhood. As a resident of this area, I am deeply concerned about the potential negative impacts that such development could have on our community.

A11-1

First and foremost, the construction of apartments in our area will inevitably lead to increased traffic congestion. Our neighborhood is already struggling with heavy traffic, and adding more residential buildings will only exacerbate the problem. This will not only make it more challenging for residents to navigate the area, but it will also impact air quality and overall environmental sustainability.

A11-2

Additionally, I am dismayed by the fact that the city has primarily focused on building expensive apartments in our neighborhood. These apartments are unaffordable for many

A11-3



## Letter A11 – Brenda Rodriguez

### Page 2 of 2

residents, and their construction could potentially displace long-time community members. It is clear that the city's priorities are out of touch with the needs and desires of the local population.

A11-3

I urge you to reconsider the decision to allow the construction of apartments in our neighborhood. Instead, I encourage the city to prioritize sustainable and affordable housing options that benefit all residents. It is crucial that we protect our community from overdevelopment and ensure that our daily lives are not negatively impacted by ill-conceived construction projects.

A11-4

Thank you for your attention to this matter.

Sincerely,

Brenda Rodriguez, MS

170th/Catalina



## RESPONSE TO COMMENT LETTER NO. A11

Brenda Rodriguez, Resident

March 19, 2024

A11-1 This comment expresses opposition to the Project. This comment has been noted and no further response is necessary.

A11-2 This comment expresses concern about the Project leading to traffic in the surrounding neighborhoods, as well as such traffic leading to air quality impacts from mobile sources. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by “level of service” (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic.

Regarding air quality impacts, **DEIR Table 4.1-6: Operational Air Pollutant Emissions**, presents the Project’s operational mobile source emissions and maximum daily total and indicates they would be below the SCAQMD’s mass daily significance thresholds. As such, Project operations would result in a less than significant air quality impact. The comment does not provide any evidence regarding traffic and air impacts or address the DEIR’s adequacy, thus, no further response is required.

A11-3 This comment discusses affordability of the housing provided by the Project and expresses concerns of resident displacement. Please refer to Response A8-5 for a discussion concerning affordable housing units. Regarding displacement of residents, as concluded in **DEIR Section 7.0: Effects Found Not to be Significant**, the Project would remove the existing onsite industrial uses and, in their place, construct residential uses. The Project would not displace existing housing or people or require construction of replacement housing elsewhere and no impact would occur in this regard. This comment does not address the DEIR’s adequacy or raise a significant environmental issue and no further response is required.

A11-4 This comment urges decision makers to deny the proposed Project in order to protect the community from overdevelopment. This comment is noted, and no further response is necessary.



**Letter A12 – Dalia Juarez**

**Page 1 of 1**

**From:** Dalia Juarez <dalia1575@gmail.com>  
**Sent:** Tuesday, March 19, 2024 4:02 PM  
**To:** publiccomment@cityofgardena.org  
**Subject:** Proposed 403 Unit Build

Caution! This message was sent from outside your organization.

This email serves as my formal objection to the proposed 403-unit build located at 16829-16907 Normandie.

There are several reasons for my objection to this build. First, quantity does not equal quality. The average cost of renting in the 90247 zip code ranges from \$1900 for a studio space to \$3400 for a 3-bedroom townhome. According to Zillow, there are currently 64 rentals available in the 90247 zip code. Take into consideration the fact that the minimum wage in California is \$18.00 an hour. To afford \$2900 in rent and individual would have to work 166 hours every month just to afford rent.

A12-1

A12-2

The City of Gardena does not house industries necessary for individuals to be able to work and live in the city. This means that the filling of this proposed build relies on individuals commuting. Whether gas or electric, this means that more cars would be on the congested streets that are already deteriorating under the current traffic conditions with the city unable (or perhaps unwilling) to maintain streets at an adequate condition. And though developers may state that each unit will be provided with an attached garage/parking you must consider the possibility that a unit may house multiple individuals. People deserve fair and equitable housing. Does the city plan on making use of the Tenant Protection Act? What about the potential impact on local schools? Gardena High School is overcrowded and ranks in the 50% percentile for quality of education.

A12-3

A12-4

Equally relevant to my opposition to this matter is the fact that the 403-unit build would place stress on the surrounding neighborhoods. Unless the unit includes sufficient guest parking options (a parking lot) the neighborhoods surrounding the 403 unit build would mean heavy traffic and unknown vehicles parking in neighborhoods with single-family homes.

A12-5

A12-6

The 7-story build is antithetical to the architecture in the area. Much taller than any of the buildings in the area this build would also negatively impact the ecology of the area: more trash, an increase in water usage (a resource already strained), the construction will create about 50 million tons of carbon emissions, and overall will exhaust limited resources while placing construction workers in danger.

The city has done a disservice to the residents by only informing residents who live within 300 feet of the proposed building. All construction within the city limits is the right of the people to know. Do better!

A12-7

Dalia R. Juarez  
Resident & Homeowner on 166th St



## RESPONSE TO COMMENT LETTER NO. A12

Dalia Juarez, Resident

March 19, 2024

- A12-1 This comment notes its opposition to the Project and discusses housing affordability in the Project area. Please refer to Response A8-5 for a discussion concerning affordable housing units. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.
- A12-2 This comment expresses concern with the Project's trip generation and resulting impacts to traffic and road maintenance services. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic. Regarding roadway maintenance, this is not an environmental issue pursuant to CEQA. Notwithstanding, the overall condition of the City's pavement network is rated as "Good," with a weighted average Pavement Condition Index (PCI) of 81.2 (range from 0 to 100). Additionally, the City's Public Works Department continues to allocate funds from its Capital Improvement Plan toward annual network pavement maintenance and rehabilitation, which is expected to gradually improve the City's weighted PCI over time. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.
- A12-3 This comment notes that multiple tenants could live in a singular unit. This comment also notes that people deserve fair and equitable housing and questions if the City will make use of the Tenant Protection Act of 2019, a state law that protects tenants from excessive rent increases and evictions without cause. This comment does not address the DEIR's adequacy or raise a significant environmental issue. This comment has been provided to City staff. This comment is noted, and no further response is necessary.
- A12-4 This comment questions the Project's impact to local schools. As concluded in **DEIR Section 4.11: Public Services**, sufficient capacity exists at the existing elementary and middle school facilities to accommodate the Project's forecast student population. Further, the Project would be subject to payment of school impact fees in accordance with SB 50. Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use



or development of real property...". Therefore, the Project would not result in adverse physical impacts associated with the construction of school facilities. A less than significant impact would occur in this regard, and no mitigation is required. This comment does not address the DEIR's adequacy and no further response is required.

A12-5 This comment suggests that the Project could increase traffic in the surrounding neighborhood and result in impacts to street parking in the local neighborhoods if there is no parking lot. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic. Additionally, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking.

A12-6 This comment expresses concern about the Project's building heights and architecture and impacts to solid waste generation, water demand, and construction emissions. Please refer to Response A8-1 for a discussion concerning Project building height.

Regarding solid waste generation, as concluded in **DEIR Section 4.15: Utilities and Service Systems (Impact 4.15-7)**, the Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Regarding water demand, as concluded in **DEIR Section 4.15 (Impact 4.15-5)**, Golden State Water Company would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Please refer to Response A11-2 for a discussion concerning air quality impacts. The commenter does not provide any evidence to substantiate their allegations and does not address the DEIR's adequacy. No further response is required.

A12-7 This comment expresses discontent with the noticing of the proposed Project and has been provided to City staff. This comment is noted, and no further response is necessary.



**Letter A13 – Terri C.**  
**Page 1 of 2**

Comment Letter 13

**From:** pcchunk02-jobs@yahoo.com <pcchunk02-jobs@yahoo.com>  
**Sent:** Tuesday, March 19, 2024 11:09 AM  
**To:** Public Comment <publiccomment@cityofgardena.org>  
**Subject:** PLANNING COMMISSION COMMENT - MARCH 19, 2024

Caution! This message was sent from outside your organization.

Dear City Officials,

Regretfully, I am unable to attend the public hearing tonight when considering the approval of Specific Plan #1-21 but would like to respectfully submit comments.

- 1. Proposing nearly 400 new housing units is an overambitious and overzealous commitment without being able to fully speak to how Gardena will look in 20-30 years based on today's decisions. A13-1
- 2. While the EIR already in full progress, and nationally, trendy urban planning studies tend to be proponents of the proposed high density housing, I have concerns for the current tax-paying residents in the area who care deeply about the community and would like to preserve a sense of community. How will this be addressed with building high density units where people stay cocooned indoors and have little incentive to get to know their neighbors? How will a sense of long-standing community involvement for all age groups be encouraged? A13-2
- 3. Re: construction noise, air quality, and road blockages/traffic for the residents in our quiet neighborhood directly adjacent to the construction site: Many senior citizen homeowners walk in their housing tracts for exercise. Health, safety and quality of life should be respected. How long will construction disturbances continue if this project moves forward? A13-3
- 4. Traffic: We have seen the congestion and traffic on Artesia Blvd over the past decade. I have had work colleagues from other counties tell me that they use Artesia Blvd as their freeway alternate to get home when the 405 is congested and it, too now resembles a busy highway. While there are sidewalks for pedestrians, I myself have almost been hit by a reckless driver while crossing the street on a green light and public safety is a growing concern that needs to be considered/addressed. A13-4
- 5. The goal on the Gardena city council website state that they are striving for "the highest quality of life" . My question to the council is how this is actually being defined. Please genuinely listen and consider your current A13-5



**Letter A13 – Terri C.**  
**Page 2 of 2**

constituents to make prudent decisions to preserve the things that make Gardena a great place.

A13-5

Respectfully, Terri C.





## RESPONSE TO COMMENT LETTER NO. A13

Terri C., Resident  
March 19, 2024

- A13-1 This comment questions the density of the Project and the long-term compatibility of the project within the City. Please refer to Response A8-1 for a discussion concerning Project density . The City’s General Plan (Gardena General Plan 2006) is a state-required long-range planning document, which identifies the City’s long-term objectives for the next 15-20 years; see **DEIR Section 4.8.: Land Use and Planning** for a discussion of Project consistency with the Gardena General Plan. As concluded in **Section 4.8**, the Project would not conflict with the relevant Gardena General Plan goals and policies and would not result in a significant environmental impact concerning a conflict with the Gardena General Plan. This comment does not address the DEIR’s adequacy or raise a significant environmental issue and no further response is required.
- A13-2 This comment expresses concern with the Project’s density and how it will impact the sense of community in Gardena. Please refer to Response A8-1 for a discussion concerning Project density. Sense of community is not a CEQA matter, however, this comment has been noted and passed on to decision makers. This comment does not address the DEIR’s adequacy or raise a significant environmental issue and no further response is required.
- A13-3 This comment asks about Project construction duration, and noted concern about construction noise, construction air quality, and construction-related road blockages/traffic. As stated in **DEIR Section 2.0: Project Description**, construction is anticipated to occur over approximately 3.5 years. Please refer to Response A4-15 for a discussion concerning construction noise. Please refer to Response A11-2 for a discussion concerning air quality impacts. Finally, regarding construction-related road blockages and traffic, as stated in **DEIR Section 4.13: Transportation**, Project construction may require traffic lane, parking lane, and/or sidewalk closures, including along Normandie Avenue, but would not result in the complete closure of any public or private street. The Project would implement PDF TR-1, which requires a Construction Traffic Management Plan, approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction. With implementation of the Construction Traffic Management Plan, temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. As such, Project construction would not result in inadequate emergency access and a less than



significant impact would occur. Therefore, this comment does not address the DEIR's adequacy and no further response is required.

- A13-4 This comment expresses concern about safety related to pedestrian facilities. As discussed in **DEIR Section 4.13: Transportation**, the Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169<sup>th</sup> Street (between Brighton Way and Normandie Avenue), on the north side of West 170<sup>th</sup> Street (between Brighton Way and Normandie Avenue), on the west side of Normandie Avenue (between West 169<sup>th</sup> Street and West 170<sup>th</sup> Street), and on the east side of Brighton Way (between West 169<sup>th</sup> Street and West 170<sup>th</sup> Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169<sup>th</sup> Street, just west of the Project site, between Brighton Way and the alley to the west of Brighton Avenue. The sidewalk improvements would be constructed pursuant to GMC §17.08.170: Improvements and designed to be consistent with the GGP Circulation Element requirements for a Local Street. With the incorporation of these proposed sidewalk improvements, the Project would create a continuous and complete pedestrian network in the area surrounding the Project site, thereby increasing pedestrian safety within the area. This comment does not address the DEIR's adequacy and no further response is required.
- A13-5 This comment requests the lead agency to consider the opinions of current constituents when considering the Project. This comment is noted, and no further response is required.



**Letter A14 – Yvonne and Arthur Acosta**  
**Page 1 of 2**

**Comment Letter 14**

**From:** Yvonne <itzyvonne7@gmail.com>  
**Sent:** Tuesday, March 19, 2024 12:03 PM  
**To:** PUBLICCOMMENT@cityofgardena.org  
**Subject:** Impact of 403 unit housing project

Caution! This message was sent from outside your organization.

**A14-1**

Planning Commission,  
As a tax paying homeowner in the city of Gardena, I am emailing your commission to make my voice heard and oppose this project (see attachment ). The extra traffic, air quality pollution, and impact on the neighborhood directly behind the proposed site would be detrimental to our local community. Instead we should focus on improving, protecting, and funding our natural environment green spaces, namely the Gardena Wetlands Willows.

**A14-2**

Respectfully,  
Yvonne and Arthur Acosta



**Letter A14 – Yvonne and Arthur Acosta**  
**Page 2 of 2**

RECORDING REQUESTED BY  
AND WHEN RECORDED MAIL TO:

City of Gardena  
1700 West 162nd Street,  
Gardena, CA 90247  
Attention: City Manager

No fee for recording pursuant to  
Government Code Sections 27383 and 27388.1

*(Space above for Recorder's Use)*

**AFFORDABLE HOUSING AGREEMENT  
AND DECLARATION OF RESTRICTIVE COVENANTS**  
(Normandie Crossing Specific Plan)

This Affordable Housing Agreement and Declaration of Restrictive Covenants (the "Agreement") is dated as of \_\_\_\_\_, 2024, and is by and between the City of Gardena, a municipal corporation (the "City"), and 16911 Normandie Associates, LLC, a Delaware limited liability company, authorized to do business in California, (the "Developer"), with reference to the following facts:

A. Developer is the owner of certain real property consisting of approximately 5.23 acres which is located at property commonly known as 16907, 16835, and 16829 Normandie Avenue, in the City of Gardena, County of Los Angeles, California, as more particularly described in the attached Exhibit A, which is incorporated herein by this reference (the "Property").

B. The City has approved a residential development of 403 units consisting of a single 7-story apartment building with 328 dwelling units ("Apartment Building") and 75 3-story townhome style units ("Townhomes") (collectively, the "Project") which required the following Project Approvals: General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Affordable Housing Agreement, and Site Plan Review;

C. As part of the Development Agreement, Developer has agreed to provide 20 units which will be affordable for lower income households in the Apartment Building for a 55 year period from the date that a certificate of occupancy is issued for the Affordable Units (the "Affordability Term").

D. The Development Agreement requires the City to ensure, and Developer to agree to, continued affordability of the Affordable Units for the Affordability Term. To ensure their continued affordability for the Affordability Term, this Agreement shall be



## RESPONSE TO COMMENT LETTER NO. A14

Yvonne and Arthur Acosta

March 19, 2024

- A14-1 This comment expresses concern about the Project’s traffic and air quality impacts to the neighborhood directly behind the Project site. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by “level of service” (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. Please refer to Response A11-2 for a discussion concerning air quality impacts. This comment does not address the DEIR’s adequacy and no further response is required.
- A14-2 This comment suggests that decision makers should focus efforts on improving, protecting, and funding the natural environment and green spaces, namely the Gardena Wetlands Willows specifically. It is noted that this is a private Project, and no City funds are being spent. This comment has been noted and passed on to decision makers.



**Letter A15 – Ace Rose**  
**Page 1 of 1**

**Comment Letter 15**

Good afternoon,

I am a homeowner and longtime resident of Gardena. I am writing regarding the development of Normandie Crossing. For reasons, I am opposed to the development of such a big building, bringing in more traffic, congestion, and parking issues to the neighborhood. I also understand the cities interest in property, taxes and more revenue for the city. However, please make a more livable and pleasant for its current residents who have been paying taxes for a very long time.

A15-1

to reiterate, I am opposed to this development of Normandie Crossing, Please consider our comments and urges NOT to bring such an overwhelming building to our community.

A15-2

Ace Rose



## **RESPONSE TO COMMENT LETTER NO. A15**

**Ace Rose**

**March 19, 2024**

- A15-1 This comment expresses concerns about the Project’s impact to traffic and parking in local neighborhoods. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by “level of service” (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. Additionally, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR’s adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking. This comment does not address the DEIR’s adequacy or raise a significant environmental issue and no further response is required.
- A15-2 This comment notes that decision makers may have an interest in the Project as it could lead to property taxes and revenue, but that they oppose the Project and urge decision makers to do the same. This comment has been noted and passed on to decision makers.



**Letter A16 – Brandon Smith**  
**Page 1 of 2**

**Comment Letter 16**

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**From:** Brandon Smith <thatbrandonsmith@gmail.com>  
**Sent:** Wednesday, March 20, 2024 5:02 PM  
**To:** publiccomment@cityofgardena.org  
**Subject:** Normandie Crossing March 19 Planning Commission follow-up statement

Caution! This message was sent from outside your organization.

Dear Chairman Henderson and Planning Commission members,

Due to the reduced time for statements due to the outpouring of public comment on March 19, I wanted to more properly outline my thoughts regarding my full support of the original proposed Normandie Crossing design, for the following reasons:

- Of course, these 403 dwelling units, or any single housing project itself, will not solve our housing crisis, much like saving an extra \$100 this month will not make or break a retirement fund in 30 years. However, every single unit built is a critical part of the whole. Each delay, size reduction or blocking of a project adds up and indeed has led to our present crisis. It is proven elsewhere in this country such as Minneapolis—building more housing units positively impacts rent prices for renters both in the newly built property and those surrounding it.
- Regarding local concern around affordability—the “lower density” option with fewer

A16-1

A16-2





**Letter A16 – Brandon Smith**

**Page 2 of 2**

apartments will only raise rent prices for the remaining units in order for the developer to recoup costs.

- Not only will the higher density reduce rent prices, but this construction is being discussed when a national court ruling in the last week regarding realtor fees is being widely reported to have a forthcoming reductive impact on purchase prices as well.
- As much as I would also love 100% affordable homes as some local voices are earnestly calling for, our system is set up to all but require private developers to build profitable properties. Social, at-cost housing is outside the scope of this project and not coming soon enough on a state level to impact the housing crisis as much as this project will.

A16-2

- Regarding local concern around traffic—although the EIR did not expect an appreciable impact on local streets, it is the responsibility of the city to add traffic calming measures to keep vehicles from driving unsafely. Speed bumps are one but not the only solution—slight chicanes and crosswalk bump-outs are also simple solutions to slow traffic and prevent 169th and other streets from becoming shortcuts for existing and future drivers.

A16-3

- It is fully up to the city to provide the safer streets that can handle this increase in population, taking heed of the landslide passing of measure HLA in Los Angeles that proves citizens across our region all want safer streets for all.

- In addition to the above traffic focus, the city [could take a page from other local municipalities \(link\)](#) and require a concession from the builder to pay for Class IV bicycle paths which would further incentivize the ownership and use of alternative transportation in these units. This area is perfect for taking a casual ride to Gardena Boulevard for a sandwich at Giulianos, meeting up with a friend at Aunties Cafe, or riding a cargo bike to Sam’s Club or Food4Less for groceries. This further reduces the potential traffic impact of the development. The project has 173 bike parking spaces—we should incentivize filling them out.

A16-4

- Concerned residents at the March 19 planning meeting raised the slow decline of Gardena in their eyes over the preceding decades. This project resets the tax base of these parcels, flowing critical additional funds that can go toward first responders & infrastructure improvements and reduce the visually blighted areas of our city.

A16-5

Simply put, there is no “somewhere else” for this project to go—all the other “somewhere elses” that, like this one, also allow for no displaced residents, must also be utilized for housing if the city is to properly attack our housing crisis and meet our minimum required housing allowance of over 5700 units within 7 years, lest we end up with even more loss of local control in the form of Builder’s Remedy projects, etc.

A16-6

I empathize and do not envy your position facing the public pressure you are receiving. These sorts of decisions are fraught and emotional on all sides. But the long view solution here to improve our city for our children’s and grandchildren’s future is to build this project at its full intended scale.

Respectfully,  
Brandon Smith



## RESPONSE TO COMMENT LETTER NO. A16

Brandon Smith

March 20, 2024

- A16-1 This comment notes that housing projects with high unit counts can positively impact rent prices for local renters and surrounding residences. This comment is noted, and no further response is necessary.
- A16-2 This comment notes that the Reduced Density Alternative would raise rent prices for the remaining units in order for the Applicant to recuperate costs. It reiterates that the Project's proposed density would help reduce rent prices, and while it would be preferred to have 100 percent affordable homes, it would not be an economically feasible option for the Applicant. This comment has been noted, and no further response is necessary.
- A16-3 This comments notes that the concerns surrounding local traffic and safety is the responsibility of the City to resolve; see also Responses A8.3 above, respectively. The comment suggested that the City consider options such as speed bumps, chicanes, and crosswalk bump-outs to slow traffic and prevent 169<sup>th</sup> street from becoming a shortcut for drivers. This comment is noted and has been passed on to the decision makers.
- A16-4 This comment suggests that the City require a concession from the builder to pay for Class IV bicycle paths which would incentivize use of alternatives modes of transportation. The comment notes that the local area is ideal for bicycle travel and that the 173 bicycle spaces proposed by the Project helps incentivize bicycle travel. As noted in **DEIR Section 4.13: Transportation**, there are existing and proposed South Bay Bicycle Master Plan (SBBMP) bike routes near the Project site. As stated in **DEIR Section 4.13 (Impact 4.13-1)**, the Project does not propose any changes to the existing bicycle facilities surrounding the Project site and it would not impede or alter the installation of the SBBMP's -planned bicycle facilities, including the Bike Friendly Street segment planned along West 170<sup>th</sup> Street. This comment has been noted and will be passed on to decision makers.
- A16-5 This comment notes that the Project would result in additional funding for first responders and City infrastructure and would reduce visually blighted areas in the City. This comment has been noted, and no further response is necessary.
- A16-6 This comment notes that the City needs housing projects that do not displace current residents in order to resolve the housing crisis and meet the minimum required



housing allowance. This comments notes its support of the proposed Project. This comment is noted and, no further response is required.



**Letter A17 – Gloria Mazzocco**

Page 1 of 2

Comment Letter 17

As a homeowner and Gardena native, I voice the following concerns regarding the Normandie Crossing Project:

- |   |              |
|---|--------------|
| <ul style="list-style-type: none"> <li>• Adding a minimum of 1,000 new residents will add more stress and congestion to our already overloaded infrastructure. Schools are crowded, Normandie already has immense traffic.</li> </ul>   | <p>A17-1</p> |
| <ul style="list-style-type: none"> <li>• The Gardena Willows Wetland Preserve, located less than half a mile from the proposed project site, is not even mentioned in the Initial Study. Yet the Dominguez Channel is mentioned "located 0.4 mile south of the Project Site" (<a href="https://files.ceqanet.opr.ca.gov/287728-1/attachment/KskNJFcZUJeo_9pRtqTi6QzWJ5EcKM3xCMrIPBpgg9pkho2TCBr7dqYtFyM35EFORVdSpnN6tQH76xuMQ">https://files.ceqanet.opr.ca.gov/287728-1/attachment/KskNJFcZUJeo_9pRtqTi6QzWJ5EcKM3xCMrIPBpgg9pkho2TCBr7dqYtFyM35EFORVdSpnN6tQH76xuMQ</a>)</li> </ul>   | <p>A17-2</p> |
| <ul style="list-style-type: none"> <li>• Per the Draft Specific Plan (<a href="https://cityofgardena.org/wp-content/uploads/2023/12/DRAFT-Normandie-Specific-Plan.pdf">https://cityofgardena.org/wp-content/uploads/2023/12/DRAFT-Normandie-Specific-Plan.pdf</a>) "The Plan Area is currently approximately 100 percent impervious. The Specific Plan will decrease the impervious area of the site by approximately fourteen percent to 86 percent." This greatly affects groundwater runoff to the above mentioned Willows, and therefore affecting water quality, soil, and air quality.</li> </ul>   | <p>A17-3</p> |
| <ul style="list-style-type: none"> <li>• Brighton Avenue, directly to the west of the Project, and 169th Street, directly north of the project are packed with cars on a regular basis, with overflow on 170th Street to the South and Brighton Avenue to the North. On any given Street Sweeping Day the City Parking Enforcement issues many citations, which has become a way of life for these residents. The project proposes 10 Guest spaces for 75 townhomes, in addition to their 2 spaces allotted per home - which is a ridiculous ratio. Where will these guests and residents park? With townhomes the size of 2, 3 and 4 bedrooms, the residents will need more than two parking spaces per unit, more like 3 or 4.</li> </ul> | <p>A17-4</p> |
| <ul style="list-style-type: none"> <li>• A 7-story building is excessive for this area, what other buildings can even compare? Gardena Memorial Hospital, which is essential to our community's healthcare is appropriate. But an overcrowded apartment building? No!</li> </ul>  | <p>A17-5</p> |
| <ul style="list-style-type: none"> <li>• The recent residential development to the north of the Project has over 60 single person units, and a great deal of its residents park on the street, not their automated parking garage, out of convenience. That property also took a significant amount of time to reach full occupancy - because so many people can't afford housing. With these larger units at the Project, there will be multiple families sharing one unit. And only 20 units of 403 deemed "affordable"? That's outrageous!</li> </ul>  | <p>A17-6</p> |



**Letter A17 – Gloria Mazzocco**  
**Page 2 of 2**

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- Construction timeline is over three years. The local residents cannot withstand that amount of noise and air pollution. There are children with asthma, elderly neighbors with weakened respiratory systems, residents with health conditions that can't enjoy a quality of life with such pollution.

A17-7

Respectfully,

Gloria Mazzocco, homeowner

(170<sup>th</sup> Street & Brighton Way)



## RESPONSE TO COMMENT LETTER NO. A17

Gloria Mazzocco, Homeowner

March 20, 2024

- A17-1 This comment expresses concerns about the Project’s impacts to local infrastructure, schools, and traffic congestion. As concluded in **DEIR Section 4.19: Utilities and Service Systems**, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed water facilities, wastewater facilities, stormwater drainage facilities, electric power and telecommunication facilities. Additionally, the proposed Project would result in a less than significant impact in regard to water supply, wastewater treatment, and solid waste generation. Please refer to response A12-4 for a discussion concerning impacts to local schools. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by “level of service” (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. This comment does not address the DEIR’s adequacy or raise a significant environmental issue and no further response is required.
- A17-2 This comments states that the Initial Study failed to mention the Gardena Willows Wetland Preserve. The Gardena Wetland Willows Preserve is located 0.3-mile southeast of the Project, just north of the commercial development at the northwest corner of Vermont Avenue and Artesia Boulevard. While the Initial Study did not mention the Gardena Wetland Willows Preserve in the analysis, the Initial Study concluded that based on review of the existing and adjacent site conditions, no candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands are present on or adjacent to the Project site. The Project site is fully developed and contains no natural habitats, with only minimal landscaping. The Project site is also bounded by roadways and surrounded by urban uses (i.e., single- and multi- family residential on all sides). Finally, Project construction activities would also occur entirely within Project site boundaries. Therefore, the Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands. This comment does not address the DEIR’s adequacy or provide any evidence of an impact to the Willows Wetland. No further response is required.
- A17-3 This comment expresses concern of the Project’s impact to Gardena Wetland Willows due to the reduction of impermeable surface area and the resulting impacts on runoff,



water quality, soil, and air quality. As concluded in **DEIR Section 4.7: Hydrology and Water Quality**, the proposed Project would result in an increase in landscaped areas throughout the Project site, which would decrease impervious surfaces from 99.7 percent under existing conditions to 85.9 percent under proposed Project conditions. The Project would reduce impervious surfaces thereby reducing flows under 10-year, 25-year, and 50-year storm events between 11.7 percent and 13.8 percent, when compared to existing conditions. Because the Project would decrease surface runoff, it would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or result in flooding on- or off-site. The Project would also treat site runoff in accordance with the LID Standards Manual. Further, as concluded in DEIR Impact 4.8-1, the Project would be subject to compliance with NPDES and GMC requirements, which include implementation of BMPs. Overall, the Project would not substantially contribute to runoff.

Regarding water quality, following compliance with NPDES and GMC requirements, which include implementation of BMPs as a Condition of Approval, the Project's construction and operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Concerning soil, the Projects proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and will assist in improving the groundwater quality.

Finally, concerning air quality, as noted in **DEIR Section 4.2: Air Quality**, the Project's construction and operational emissions would be below SCAQMD thresholds and would result in a less than significant impact.

The comment does not provide any evidence of any impacts and does not address the DEIR's adequacy. No further response is required.

A17-4 This comment expresses concern about the Project's proposed parking areas suggesting that the Project would result in parking on local streets. Parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking.

A17-5 This comment notes that a seven-story apartment building is excessive for the City. Please refer to Response A8-1 concerning Project building height. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.



- A17-6 This comment notes that a residential project to the north uses the local streets for parking; see Response A17-5 above concerning parking on local streets. This comment also mentions that the residential project to the north took a long time to become fully occupied and notes discontent that only 20 units for the Project will be deemed affordable. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.
- A17-7 This comment expresses concerns about Project construction-related air quality and noise impacts to nearby sensitive receptors. Please refer to Response A11-2 for a discussion concerning air quality impacts. Please refer to Response A4-15 for a discussion concerning construction noise. This comment does not address the DEIR's adequacy and no further response is required.





**Letter A18– Liliana Arreguin**  
**Page 1 of 1**

Comment Letter 18

Hello,

I live on Brighton Way and have been living here for the past 15years. It has been very peaceful and a very lovely neighborhood. The fact that you want to build a 7 story tall building is very disturbing. I work hard and pay property taxes to live in this nice quiet neighborhood. That 7 story building will make everything around me even more congested than what it is. And the NOISE level of building such monstrosity, I do not even want to image. Parking everywhere around my home will be a nightmare. Why should I suffer because you want to build something.

A18-2

A18-1

I know you guys can build somewhere else. Leave my neighborhood alone! You keep on just building new apartments and condos in Gardena. How about let the neighbors who pay taxes enjoy their properties.

A18-3

Liliana Arreguin  
Brighton Way, Gardena



## RESPONSE TO COMMENT LETTER NO. A18

Liliana Arreguin, Resident

March 20, 2024

A18-1 This comment expresses concern about the Project's potential impacts to congestion. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A18-2 This comment expresses concern about the Project's construction noise impacts and the potential impacts to parking on local streets. Please refer to **DEIR Section 4.9: Noise** and to Response A4-15 for a discussion concerning construction noise. The comment does not address the DEIR's adequacy on this issue and no further response is necessary.

Additionally, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking.

A18-3 This comment expresses opposition to the Project. This comment is noted, and no further response is necessary.



Letter A19- Various

Page 1 of 18

PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

1  
 1

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
1. DANA COTTER	<i>Dana Cotter</i>	16808 HALDALE	COTTERD@TWC.COM
2. RICARDO MELGOSK	<i>Ricardo Melgosa</i>	16904 HALDALE AVE. PL. 2002	<i>RMELGOSA@HOTMAIL.COM</i>
F 3. FERNANDO LOPEZ	<i>Fernando Lopez</i>	16803 Halldale Ave	
F 4. CRAIG HAMA	<i>Craig Hama</i>	16715 Halldale Ave	<i>craig.hama@gmail.com</i>
P 5. LESLEY CHEN	<i>Lesley Chen</i>	16714 & 16716 HALDALE AVE	<i>lesley.chen@gmail.com</i>
cut de 6. DAN ARANDA	<i>Dan Aranda</i>	1441 W. 168th St. Gardena	
7. JAMAINA MENDOZA	<i>Jamaina Mendoza</i>	1440 W. 168th St Gardena	
8. JOSE MENDOZA	<i>Jose Mendoza</i>	1440 W. 168th St. Gardena, CA	
9. NANCY CERVANTES	<i>Nancy Cervantes</i>	1449 W 168th St. Gardena, CA	<i>nancy.cervantes@hotmail.com</i>
10. ELVIRA CERVANTES	<i>Elvira Cervantes</i>	1449 W 168th St Gardena	
11. SOLANDA ALVAREZ	<i>Solanda Alvarez</i>	1449 W 168th St Gardena	
12. JOSE LUIS C.P.	<i>Jose Luis C.</i>	1449 W 168th St. Gardena.	
13. VIRGINIA DE LEON	<i>Virginia De Leon</i>	16711 Halldale Ave. Gardena	
14. <del>Tracey Edwards</del>	<del><i>Tracey Edwards</i></del>	<del>10900 Halldale Ave #A, Gardena</del>	
15. GARY JUE	<i>Gary Jue</i>	16929 halldale Ave GARDENA	
16. Jeah Nakayama	<i>Jeah Nakayama</i>	17115 Halldale Ave, Gardena CA 90247	
17. MARIANO AVILA	<i>Mariano Avila</i>	1510 W. 170TH ST. GARDENA	
18. Jeah Avila	<i>Jeah Avila</i>	1510 W. 170th St. Gardena, CA 90247	

~~173~~



Letter A19- Various  
 Page 2 of 18

PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT **2**

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
19 Hien Truong		1520 W 170th St, #B Gardena, CA 90247	
20 Stephen Hunt		1464 W. 170th Street GARDENA, CA. 90247	
21 ROBERTA Sturdevant Wood		1460 170th St Gardena CA 90247	
22 Michel J. Wood		1460 W. 170 ST. GARDENA, CA. 90247	
23 Shingi Takeshita		1452 W. 170th Garden CA 90247	
24 SHERI SAKATEXO		1444 W. 170th Gardena Ca. 90247	
25 Guan Yamamoto		1440 W. 170th St	
26 Brent Aoki		17107 Halldale, 90247	
27 Kenny Doi		17111 Halldale Ave 90247	
28 Debra Doi		17111 Halldale Ave 90247	
29 LYNN WITHROW		17119 HALLDALE AVE 90247	
30 RUBY ANCHETA		17203 Halldale Ave. 90247	
31 LENA YANG		17210 Halldale Ave., 90247	
32 Julia Estrada		1519 W. 173rd St Gardena Ca. 90247	
33 Byron Fonseca		1519 W. 173 St. Gardena, Ca. 90247	
34 IWAMOTO, I Idwanato		1520 W 173rd St Gardena	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
35 Lisa Price	<i>Lisa Price</i>	1516 W. 172 <sup>nd</sup> St <sup>90247</sup>	lisalyonprice@gmail.com
36 Antwon Martin	<i>Antwon Martin</i>	1468 West 173rd St.	antwonnmartin@gmail.com
37 Elide Rubalcava	<i>Elide Rubalcava</i>	1464 W. 172 <sup>nd</sup> St	elide.rubalcava1474@gmail.com
38 Armin Widjaya	<i>Armin Widjaya</i>	1452 W. 173rd St.	hh-mirya@yahoo.com
39 Les Harada	<i>Les Harada</i>	1436 W. 173rd St.	haradaL@hotmail.com
40 Anastasia Conlas	<i>Anastasia Conlas</i>	1431 W 173rd St	raeyunka@gmail.com
41 ERWIN CANLAS	<i>Erwin Canlas</i>	1431 W. 173RD ST. <sup>90247</sup>	INSOMNIA@INLU@GMAIL.COM
42 Ueli Guter	<i>Ueli Guter</i>	1432 W 173rd St	uagliter@gmail.com
43 Denise Aumiller	<i>Denise Aumiller</i>	1415 W. 172nd St.	deniseaumiller@gmail.com
44 ELINOR BARBICK	<i>Elinor Barbick</i>	1411 W. 173RD ST GARDENA, CA 90247	elinorbarbick@gmail.com
45 STANLEY	<i>Stanley</i>	1420 W 173rd St GARDENA, CA	stanley@gmail.com
46 TRACI SMITH	<i>Traci Smith</i>	17016 Brighton Way	
47 SUNNY CHOI	<i>Sunny Choi</i>	17208 BRIGHTON WAY	
48 JUNE SHIMIZU	<i>June Shimizu</i>	17204 Brighton Way	
49 ELAINE YANO	<i>Elaine Yano</i>	17200 Brighton Way	
50 CHIZUKO AMBROSE	<i>Chizuko Ambrose</i>	17112 BRIGHTON WAY GARDENA, CA	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT **4**

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
51 ALVIN BUTLER	<i>Alvin Butler</i>	16922	
52. RON NAGAOKA	<i>Ron Nagaoka</i>	16916 S HARVARD BLVD	
53. SAYURI NAGAOKA	<i>Sayuri Nagaoka</i>	" " "	
54. KUSSMES KYOG		16910 S HARVARD BLVD	
55. William Noui		1777w 869th PL GARDENA CA	
56. Jimmie Seda		16902 S. Harvard Blvd Gardena CA	
57. Corby Carrara	<i>Corby Carrara</i>	16820 S. Harvard Blvd. CA.	
58. Ailyn Carrara	<i>Ailyn Carrara</i>	16890 S. Harvard Blvd. CA.	
59. Julian Bernardino		16824 S. Harvard Blvd. CA.	
60. <del>Patricia</del> <i>Patricia</i>	<i>Patricia</i>	16820 S Harvard Blvd, Gardena	
61. Dinora Agino	<i>Dinora Agino</i>	16807 S. Harvard Blvd Gardena 9024	
62. Michael Bedernik	<i>Michael Bedernik</i>	16817 S Harvard Blvd Gardena CA 9024	
63. Stephanie Bedernik	<i>Stephanie Bedernik</i>	16817 S Harvard Blvd, Gardena, CA	
64. LILLIE VERA	<i>Lillie Vera</i>	16825 S HARVARD BLVD	9024
65. RUCER MARTINEZ	<i>Rucer Martinez</i>	16827 S. HARVARD BLVD	90247
66. Minerva Martinez			
67. Maria	<i>Maria</i>	16903 S. Harvard bl.	
68. Luis Gutierrez		424-221-4972	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 5

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
69 NORA B. FREY	<i>Nora B. Frey</i>	16911S Harvard Blvd	nbfrey@aol.com
70 MICHAEL J. FREY	<i>MJ Frey</i>	16911 Harvard Blvd	LJLFREY@aol.com
71 Nieves Reyes	<i>Nieves Reyes</i>	16919S Harvard BLV	
72 Spenser Murabata	<i>Spenser Murabata</i>	16923 Harvard Blvd	smurabata@gmail.com
73 KELL MURABATA	<i>Kell Murabata</i>	16923 HARVARD BL	
74 ROMMEO RIVERA	<i>Romero Rivera</i>	16927S HARVARD BLVD	
75 ROMUALDO VELAZQUEZ	<i>Romualdo Velazquez</i>	16931S HARVARD BLVD	WABIEVELAZQUEZ@GMAIL.COM
76 DONNETTA SALOMO	<i>Donnetta Salomo</i>	16995 Denker	denista@socgob.net
77 Joel Braun	<i>Joel Braun</i>	16941 Denker Ave	
78 Elizabeth Braun	<i>Elizabeth Braun</i>	16941 Denker Ave	
79 TIM BRAUN	<i>Timothy J. Braun</i>	16941 Denker Ave	
80 KETPHER MCKENNIE	<i>Ketphie McKennie</i>	1714 W. 169th PLACE	
81 Jose Zavala	<i>Jose Zavala</i>	16930 S. Hobart Blvd.	
82 Brenda Zavala	<i>Brenda Zavala</i>	16930 S. Hobart Blvd	
83 Ricardo DeBorbon	<i>Ricardo DeBorbon</i>	16930 S. Hobart Blvd.	
84 CARMEN Kohatsu	<i>Carmen Kohatsu</i>	16818 S. HOBART BLVD.	
85 Alex Kohatsu	<i>Alex Kohatsu</i>	16818 S. HOBART BLVD	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 6

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
86 Kandace Adepoju	<i>[Signature]</i>	16811 Normandie Blvd Gardena 90247	khawkins.adepoju@gmail.com
87 SCOTT SHAWKI	<i>[Signature]</i>	16915 S. HOBART BL. #B GARDENA	
88 STERE MOTAYASA	<i>[Signature]</i>	16915 S. HOBART BL. #B GARDENA	
89 Torre Tanka	<i>[Signature]</i>	16931 S. HOBART BL GARDENA	
90 Rosa Santiago	<i>[Signature]</i>	1738 W. 169th Place	Josescsantiago@gmail.com
91 Jose Santiago	<i>[Signature]</i>	1738 W. 169th Place	Josescsantiago@gmail.com
92 Rodolfo Navarro	<i>[Signature]</i>	1738 W. 169th Place	Josescsantiago@gmail.com
93 Linda Yee	<i>[Signature]</i>	1722 W 169th Pl	Josescsantiago@gmail.com
94 Joyce Wakatanishi	<i>[Signature]</i>	1652 W 169th Pl #A Gardena CA 90247	jm.wakatanishi@gmail.com
95 Silvia Shishido	<i>[Signature]</i>	1620 W. 169th. Pl. Gardena, Ca. 90247	
96 Jessie N. Carram	<i>[Signature]</i>	16930 S Howard Bl. 90247	
97 Silvio Carrara	<i>[Signature]</i>	" " " "	
98 Ha Nutter	<i>[Signature]</i>	1620 W. 169th Pl Gardena	hanguyen117@yahoo.com
99 Isabel Gomez	<i>[Signature]</i>	1624 W. 169th Pl. Gardena	90247
100 Edwin A Garcia	<i>[Signature]</i>	17019 S. DENKER AVE	
101 Cynthia Stevens	<i>[Signature]</i>	17107 S Denker Ave. Gardena 90247	
102 Mary Maeda	<i>[Signature]</i>	17129 Denker Ave. Gardena, 90247	





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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
103	Lily Ramirez	<i>[Signature]</i>	16838 S Denker Ave Gardena	
104	ARMANDO RAMIREZ	<i>[Signature]</i>	16938 Denker	
105	MARIA BRICK	Maria Brick	16922 LA SALLE AVE GARDENA	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

8

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
106	Maie Takano	<i>Maie Takano</i>	17016 Steven St, Gardena 90247	
107	Betty Kiyohara	<i>Betty Kiyohara</i>	17024 Steven St, Gardena, 90247	
108	XURO RA CACTOIA BIRCC	<i>[Signature]</i>	17116 Steven St Gardena 90247	
109	Linda Mays	<i>Linda Mays</i>	17120 Steven St, Gardena, CA 90247	
110	Diane Guzman	<i>Diane Guzman</i>	17111 Steven St Gardena 90247	
111	HOLLY CHANG	<i>[Signature]</i>	17027 Steven St Gardena 90247	
112	ALEXIS IRON	<i>[Signature]</i>	1116 W 168th St Gardena 90247	
113	STEVE YOSHIDA	<i>[Signature]</i>	17003 Steven St, Gardena 90247	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 9

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
114. MICHAEL HALL	<i>Michael Hall</i>	1436 W. 171 ST	90247 mhall90247
115. ROSESATO	<i>Rose Sato</i>	1436 W. 171 <sup>ST</sup>	90247 rosesato@yahoo.com
116. Todd Yorizane	<i>Todd J</i>	1446 W. 171st	90247
117. Fujikoyano	<i>[Signature]</i>	1444 W 171ST	90247
118. Harriet Shimohara	<i>[Signature]</i>	1424 W 171 <sup>ST</sup>	90247
119. ARTHUR SHIMOHARA	<i>Arthur Shimohara</i>	1424 W. 171 <sup>ST</sup>	90247
120. TIM OKAMOTO	<i>[Signature]</i>	1416 W 171 <sup>ST</sup>	90247
121. GACHI ISHII	<i>[Signature]</i>	1468 W. 171ST	GARDENA.
122. Matthew Patao	<i>M Patao</i>	1459 W. 171st ST	Gardena 90247
123. BOB TOMATI	<i>Bob Tomati</i>	1443 W. 171 <sup>ST</sup>	ST GARDENA.
124. Darlene Azzam	<i>[Signature]</i>	1419 W. 171st Street	Gardena 90247
125. ED AZZAM	<i>[Signature]</i>	1419 W. 171 ST.	GARDENA 90247
126. KARRIS SANCHEZ	<i>[Signature]</i>	1415 W. 171st St	Gardena CA 90247
127. HARVEY KNOWLTON	<i>[Signature]</i>	16954 Hillside Ave	GARDENA 90247
128. DAVID IWAMASA	<i>[Signature]</i>	1435 W. 171 <sup>ST</sup> STREET,	GARDENA, 90247
129. Chong Koh	<i>[Signature]</i>	1447 W. 171st St.	Gardena 90247
130. DAWN Tankersley	<i>[Signature]</i>	1451 W. 171 <sup>ST</sup> ST.	Gardena, CA 90247



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 10

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
131	GENE MASILLI	<i>[Signature]</i>		
132	Kathy Hashimoto	<i>[Signature]</i>	1403 W 171ST ST 90247	
133	CHRIS TANKERSLEY	<i>[Signature]</i>	1451 W. 171 <sup>ST</sup> ST. 90247	
134	Gina Isaacson	<i>[Signature]</i>	1439 W 171st Gardena	Kdash515@gmail.com
135	ALAN MORIMIZU	<i>[Signature]</i>	1420 W. 171ST GARDENA	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
136 Kevin Collier	<i>Kevin Collier</i>	1332 W 169th Pl, Gardena	
137 Irene Collier	<i>Irene Collier</i>	1332 W 169th Pl, Gardena, CA	Kitcollier@aol.c
138 LESTER RUISTRUZ	<i>Lester</i>	1333 W 169th Pl. GARDENA CA 90247	
139 DELIA L TIO	<i>Delia L Tio</i>	1333 W 169th Gardena CA 90247	
140 MICHELLE NAKAMURA	<i>Michelle Nakamura</i>	1315 W. 169TH PLACE GARDENA CA 90247	
141 Nicole Ueda	<i>Nicole Ueda</i>	1307 W 169th Place - Gardena CA 90247	
142 MICHAEL UEDA	<i>Michael Ueda</i>	1307 W 169th Pl, GARDENA CA 90247	
143 Aya Edamoto	<i>Aya Edamoto</i>	16815 S Mariposa Ave "	
144 Karen Okamoto	<i>Karen Okamoto</i>	16835 Mayflower Gardena 90247	
145 Maria Hingjosa	<i>Maria Hingjosa</i>	16815 Mayflower Cir Gardena 90247	
146 KIRSTEN TANAKA	<i>Kirsten Tanaka</i>	16916 S. MARIPOSA AVE GARDENA, CA 90247	
Nancy Langley	<i>Nancy Langley</i>	17007 Steven St, Gardena, CA 90247	
147 Joanne Nagano	<i>Joanne Nagano</i>	17107 Steven St. Gardena	
148 James Carter	<i>James Carter</i>	17087 Vermont Ave Gardena	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 11

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
147 Linda Wilson	[Signature]	17045 S. Dalton Ave.	
148 Patsy Nakano	[Signature]	17112 S. Dalton Ave	
149 Teresa Patajo	[Signature]	16818 S. Dalton Ave	
150 Jim Higa	[Signature]	1421 W 172nd	thig21122630@pm
151 Jackie Kordonos	[Signature]	17104 Brighton Way	
152 Channie chim	[Signature]	1435 W 172nd ST	channie.w.chi@gmail
153 Ruben Fujiki	[Signature]	1447 W 172nd St	
154 MIKE HAMILTON	[Signature]	1455 W 172ND ST	
155 REGINA HAMILTON	[Signature]	1485 W 172nd St	
156 JOSE YI	[Signature]	1467 W 172ND ST	5Y5ramon@gmail.com endrit25@gmail.com
157 ELAINE MORITA	[Signature]	17202 Hall dale Ave	Gardena CA 90247
158 ROBERT JIMENEZ	[Signature]	1456 W 172nd St	GARDENA CA
159 DOMINGA JIMENEZ	[Signature]	1456 W 172nd St	GARDENA CA
160 Paul + Monica VanGundy	[Signature]	1452 W 172nd St	GARDENA CA
161 BRIAN NEWTON	[Signature]	1428 W 172ND ST	
162 Kimball Noto	[Signature]	" " "	
163 Dawn Jones	[Signature]	16904 Hall dale Ave	Gardena CA 90247



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 12

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
164 Hirofumi Kanada	<i>[Signature]</i>	16907 S Normandie	Hirofumi@comcast.com
165 Virginia Almaraz	<i>[Signature]</i>	1516 W. 170 <sup>th</sup> St	
166 Thomas Lee	<i>[Signature]</i>	1553 W. 170 <sup>th</sup> St	
167 Barbara Lee	<i>[Signature]</i>	1533 W 170 <sup>th</sup> St	
168 Miguel Castaneda	<i>[Signature]</i>	1644 N. 168 <sup>th</sup> St Gardena	
169 Sachyn Marquez	<i>[Signature]</i>	11037 W 1108 <sup>th</sup> St	
170 Chrissy Parson	<i>[Signature]</i>	11652 W 1108 St Gardena	
171 Harry Wilson	<i>[Signature]</i>	17057 S. Vermont unit 115 Gardena	
172 Ana Munoz	<i>[Signature]</i>	17108 Brighton Way Gardena CA	
173 Liliانا Arreguin	<i>[Signature]</i>	17108 Brighton Way Gardena CA	
174 AUDREY HOLLAND	<i>[Signature]</i>	17057 S. Vermont, Gardena, CA	
175 Yonna Hydro	<i>[Signature]</i>	1324 W. 169 <sup>th</sup> Pl., Gardena, CA	
John Hydro	<i>[Signature]</i>	1324 W. 169 <sup>th</sup> Pl., GARDENA, CA	
Mark Sather	<i>[Signature]</i>	1428 W 171 ST	902917
DANIEL SUYAMA	<i>[Signature]</i>	17001 BRIGHTON AVE	
CHARIE ISHITANI	<i>[Signature]</i>	17001 BRIGHTON AVE	



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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

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We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
171 Kathleen Kishi		1451 W. 172nd	Kathkishi@gmail
172 Glenn Kishi		" "	"
173 RUBY MURAI		1459 W 172nd St	RUBYKOKU@GMAIL.COM





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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Sal Silva		16115 Halldale Ave Gardena 90247	SSilvaferbox@yahoo.com
Ruby Hunt		144 W. 17th St Gardena, CA 90247	
BRANDON TANORI		1443 W. 172nd St Gardena CA 90247	
Andrea Tanori		1443 W. 172nd St. Gardena, CA 90247	
LORY SHERAZAFI		1424 W. 172nd St. Gardena CA 90247	
Andres Hernandez		15817 HALLDALE AVE 90247	
Justin Jaloma		15824 Halldale Ave 90247	
Glady's Alatorre		15824 Halldale Ave 90247	
ROBIN SERPAS		15824 HALLDALE AVE 90247	AP C
Christopher Gordon		15824 Halldale Ave 90247	AP C

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Tulia Nyström	<i>Tulia Nyström</i>	1212 W 16 <sup>th</sup> St	julienystrom@yahoo.com
ADRIAN YOSHIYAMA	<i>Adrian Yoshiyama</i>	15801 HALLODALE AVE	adrian040@aol.com
MARIE YASUDA	<i>Marie Yasuda</i>	15801 HALLODALE AVE	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Annie Roddy	<i>Annie Roddy</i>	15817 1/2 Halldale Ave	Gardena
TIMOTHY HALL	<i>Timothy J. Hall</i>	212 AMETHYST CIR	
Virginia Burgos	<i>V. Burgos</i>	1056 W 168 St	grandeemoe@hst
Richard Luna	<i>Richard Luna</i>	1209 W. GARDENA BLVD	90247
Shirley Treiber	<i>Shirley Treiber</i>	29 MERIT PKDR, GARDENA	9102
J.J. Honami Uchiyama	<i>J.J. Honami Uchiyama</i>	15824 Halldale Ave, Frnt.	Gardena, CA 90247
EDNA M KURIYAMA	<i>Edna M. Kuriyama</i>	15828 Le Belle AVE	CA 90247
MINORU KURIYAMA	<i>Minoru Kuriyama</i>	15828 Le Belle Ave	
FRED TORRES	<i>Fred Torres</i>	16105 BRIGITON	
Ariel Nakano	<i>Ariel Nakano</i>	15820 La Salle AVE	Gardena CA 90247
AUDREY YOSHIYAMA	<i>Audrey Yoshiyama</i>	15801 HALLDALE AVE	CA 90247
MICHAEL YOSHIYAMA	<i>Michael Yoshiyama</i>	15801 HALLDALE AVE	CA 90247
CARI SEMENZA	<i>Carl Semenza</i>	15913 S. Halldale Ave	Gardena CA 90247
Carl Semenza	<i>Carl Semenza</i>	49 Merit Park Dr	90247
ROSALVA R. GOMEZ	<i>Rosalva R. Gomez</i>	16105 S. DALTON AVE	90247 ROSIE TOEY
Louie A. Gomez	<i>Louie A. Gomez</i>	16105 S. Dalton Ave	90247 gomez louie 17@ya
Amy Silva	<i>Amy Silva</i>	16115 Halldale Ave	uquela@ick Gardena 90247 CC

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Patricia McCauley	<i>Patricia McCauley</i>	17012 Steven St	fishmccauley@gmail.com
Victor J. Rocha	<i>V Rocha</i>	14111 HALDALE AVE	juttarocha@hotmail
DONALD L. DEAR	<i>Donald L Dear</i>	15433 CATALINA	dldear@hotmail.com
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DEBORAH REMILLARD	<i>Deborah Remillard</i>	16924 So. Mariposa A Gardena CA 90247	
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Shirley Treviken	<i>Shirley Treviken</i>	29 MERIT BLVD, GARDENA CA	
Enou McDuffie	<i>Enou McDuffie</i>	13016 Daleside Ave Gardena, CA 90249	
Rebekah Blonshine	<i>Rebekah Blonshine</i>	13016 Daleside Ave Gardena CA 90249	
Aileen Brake	<i>Aileen Brake</i>	124 W. 182nd St. Gardena CA 90249	
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14



## **RESPONSE TO COMMENT LETTER NO. A19**

Various, Residents

April 2, 2024

- A19-1 This petition is has been provided to City staff. The petition expresses concern with the height and density of the proposed apartment building, and potential impacts related to traffic and quality of life. Please refer to Response A8-1 for a discussion concerning Project building height and density. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by “level of service” (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic. As traffic and quality of life are not CEQA issues, this comment has been noted, and no further response is necessary.



**Comment Letter A20 – Layne Fajeau**



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Oakland, CA 94612

www.lozeaudrury.com  
richard@lozeaudrury.com

*Via Email*

March 19, 2024

Amanda Acuna, Planner  
Community Development, Planning  
City of Gardena  
1700 W. 162nd Street, Room 101  
Gardena, CA 90247  
[AAcuna@cityofgardena.org](mailto:AAcuna@cityofgardena.org)  
[publiccomment@cityofgardena.org](mailto:publiccomment@cityofgardena.org)

**Re: Comment on Normandie Crossing Specific Plan Project (SCH No. 2023050241, SPR #11-21, Environmental Assessment #20-21) at the March 19, 2024, City of Gardena Planning Commission Meeting, Agenda Item #6A**

Dear Ms. Acuna,

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Normandie Crossing Specific Plan Project (SCH No. 2023050241, SPR #11-21, Environmental Assessment #20-21), including all actions related or referring to the proposed demolition of 115,424 square feet of industrial uses and construction of 403 multi-family dwelling units, including 328 apartment units in one building and 75 townhome units in nine buildings, located at 16829, 16835, and 16907 South Normandie Avenue in the City of Gardena (“Project”) that will be heard by the Gardena Planning Commission on March 19, 2024, as Agenda Item #6A.

A20-1

SAFER is concerned that the Final Environmental Impact Report (“FEIR”) fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. Specifically, SAFER is concerned that the FEIR fails to mitigate harmful impacts regarding noise pollution. SAFER requests that the Community Development Department address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project.

A20-2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

A20-3



## **RESPONSE TO COMMENT LETTER NO. A20**

**Layne Fajeau, Attorney**

**March 19, 2024**

**A20-1** This comment is introductory in nature and states that the Law Office of Lozeau Drury has submitted comments on behalf of the Supporters Alliance for Environmental Responsibility (SAFER). No further response is necessary.

**A20-2** The comment suggests the City should revise and recirculate the DEIR to address “all feasible mitigation measures to reduce noise pollution.” Further, the comment suggests the City recirculate the Draft EIR.

As discussed in Section 4.9, due to the distance to sensitive receptors, there are no feasible mitigation measures to mitigate construction noise to less than significant. As discussed in Section 6.5, the analysis considered, but ultimately rejected, an alternative which would avoid the Project’s significant unavoidable construction noise, given the only way to avoid the significant impact would be no construction. Section 6.5 includes discussion of other mitigation measures incorporated to attempt to mitigate the impact, but nevertheless the impact would remain significant and unavoidable. The commenter has not provided substantial evidence of any other feasible mitigation measures that should be adopted.

**A20-3** The comment states that the commenter reserves the right to supplement the comments and incorporates by reference all comments regarding the EIR. The comment is noted. No further response is necessary.



**Comment Letter A21 – Brian Flynn**  
**Page 1 of 4**

*Via Email*

March 27, 2024

Deryl Henderson, Chair  
Stephen P. Langley, Vice-Chair  
Jules Kanhan  
Steve Sherman  
Ronald Wright-Scherr  
Planning and Env'tl. Quality Commission  
City of Gardena  
1700 W. 162nd Street  
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Amanda Acuna, Planner  
Community Development Department  
City of Gardena  
1700 W. 162nd Street, Room 101  
Gardena, CA 90247  
AAcuna@cityofgardena.org

**Re: Comment on Normandie Crossing Specific Plan Project EIR  
EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21;  
VTM 4-21; DA 2-21  
Hearing Date: April 2, 2024**

To Chair Henderson, Vice-Chair Langley, Honorable Commissioners, and Ms. Acuna,

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) and its members living in/near the City of Gardena regarding the Normandie Crossing Specific Plan Project (EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21) (“Project”) to be heard at the Commission’s April 2, 2024 meeting.

The Project proposes the demolition of 115,424 square feet of industrial uses and construction of 403 multi-family dwelling units, including 328 apartment units in one building and 75 townhome units in nine buildings, located at 16829, 16835, and 16907 South Normandie Avenue.

A21-1

SAFER is concerned that the Draft Environmental Impact Report (“DEIR”) and Final Environmental Impact Report (“FEIR”) (collectively, “EIR”) fail to comply with the requirements of the California Environmental Quality Act (“CEQA”). SAFER respectfully requests that the Commission refrain from recommending approval of the Project until the EIR’s deficiencies are remedied and a revised EIR is circulated for public review and comment.

A21-2





**Comment Letter A21 – Brian Flynn**  
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SAFER Comment  
Normandie Crossing Specific Plan Project  
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**DISCUSSION**

**I. The EIR Relies on Improperly Deferred Mitigation.**

An agency’s adoption of a mitigation measure for a significant environmental effect that merely states a “generalized goal” to mitigate a significant effect without committing to any specific criteria or standard of performance violates CEQA by improperly deferring the formulation and adoption of enforceable mitigation measures. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670.) Here, the City is improperly relying on deferred mitigation for the Project’s impacts from asbestos and soil contamination and, as a result, the EIR does not comply with CEQA.

According to the DEIR, the potential impacts from asbestos exposure during demolition will be mitigated by COA HAZ-1:

**Asbestos Survey.** Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations.

(DEIR, p. 4.6-22.) COA HAZ-1 only requires a future survey to determine the presence or absence of asbestos. There are no specific criteria or standards of performance in COA HAZ-1 to address how the impacts of asbestos will be mitigated in the event that asbestos is detected prior to demolition. Without any such criteria or standards of performance, the City cannot rely on COA HAZ-1 to mitigate the Project’s asbestos impacts.

A21-3

MM HAZ-1 similarly requires a future “Construction Management Plan” with *no* specific criteria or performance standards:

**MM HAZ-1.** Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.

(DEIR, p. 4.6-23.) MM HAZ-1 is improperly vague and only requires that a plan be submitted prior to demolition. MM HAZ-1 does not provide any criteria or performance standards for the plan. Instead, MM HAZ-1 only requires a future plan that will discuss the “procedures and requirements for responding to a disturbance of undocumented contaminated soil.”



**Comment Letter A21 – Brian Flynn**  
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March 27, 2024  
 SAFER Comment  
 Normandie Crossing Specific Plan Project  
 Page 3 of 4

CEQA is clear that the City may only defer the formulation of mitigation measures when it “recognizes the significance of the potential environmental effect, commits itself to mitigating its impact, and articulates specific performance criteria for the future mitigation.” (*Gentry v. City of Murietta* (1995) 36 Cal.App.4th 1359, 1411.) Because COA HAZ-1 and MM HAZ-1 do not contain any specific performance criteria, those measures amount to improperly deferred mitigation. As a result, the EIR must be revised to include specific performance criteria for hazards.

A21-3

**II. The EIR Fails to Sufficiently Justify a Statement of Overriding Considerations.**

As the City concedes, the Project would result in *significant and unavoidable impacts* due to construction noise. Under CEQA, when an agency approves a project with significant environmental impacts that will not be fully mitigated, it must adopt a “statement of overriding considerations” finding that, because of the project’s overriding benefits, it is approving the project despite its environmental harm. (14 CCR § 15043; PRC § 21081(B); *Sierra Club v. Contra Costa Cnty.* (1992) 10 Cal.App.4th 1212, 1222). A statement of overriding considerations expresses the “larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes and the like.” (*Concerned Citizens of South Central LA v. Los Angeles Unif. Sch. Dist.* (1994) 24 Cal.App.4th 826, 847).

A statement of overriding considerations must be supported by substantial evidence in the record. (14 CCR § 15093(b); *Sierra Club v. Contra Costa Co.* (1992) 10 Cal.App.4th 1212, 1223.) The agency must make “a fully informed and publicly disclosed” decision that “specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project.” (14 CCR § 15043(b)). As with all findings, the agency must present an explanation to supply the logical steps between the ultimate finding and the facts in the record. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515). Key among the findings that the lead agency must make is that:

“Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report...[and that those] benefits of the project outweigh the significant effects on the environment.”

(PRC § 21081(a)(3), (b).) The City must make specific findings, supported by substantial evidence, concerning both the environmental impacts of the Project, and the economic benefits including “the provision of employment opportunities for highly trained workers” created. However, the City fails to include any mention of the Project’s use of highly trained workers in the EIR or Staff Report.

A21-4



**Comment Letter A21 – Brian Flynn**  
**Page 4 of 4**

March 27, 2024  
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In short, the City cannot support its conclusion that the economic benefits of the Project outweigh the environmental costs if it does not know what the economic benefits will be. A revised EIR, Fiscal Analysis and Statement of Overriding Considerations is required to provide this information. The analysis must analyze whether the Project will provide employment opportunities for highly trained workers during construction and operation, or whether employment opportunities will be only for low-paid, unskilled workers.

A21-4

**CONCLUSION**

Due to improperly deferred mitigation for the impacts of hazards and hazardous materials and the failure to justify a statement of overriding considerations for the significant and unavoidable noise impacts, SAFER respectfully requests that the Commission refrain from recommending certification of the EIR. Instead, a revised EIR should be prepared and circulated for public review and comment prior to further consideration of the Project. SAFER reserves the right to further supplement this comment during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).)

A21-5

Sincerely,

Brian B. Flynn  
Lozeau Drury LLP



## RESPONSE TO COMMENT LETTER NO. A21

Bryan Flynn, Attorney

March 27, 2024

- A21-1** This comment is introductory in nature and states that the Law Office of Lozeau Drury has submitted comments on behalf of the Supporters Alliance for Environmental Responsibility (SAFER). The comment also summarizes the Project. No further response is necessary.
- A21-2** This comment states that SAFER has concerns regarding the Draft EIR and believes the Draft EIR should be recirculated. See responses A21-3 through A21-4. This is simply a generalized comment that does not require a response.
- A21-3** This comment states that COA HAZ-1 and MM HAZ-1 are deferred mitigation measures, as neither include performance standards or criteria. Given the potential for unknown hazardous materials/contamination is unknown (place, medium, amount, type of contaminant, etc.), it is not possible to set performance standards for unknown contamination that could be included in MM HAZ-1. In regard to COA HAZ- 1, Section 18.42.200 of the GMC requires the Project to comply with SCAQMD Rule 1403 for asbestos-containing materials. SCAQMD Rule 1403 provides requirements for demolition and renovation activities to include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. Therefore, if the Asbestos Survey required per COA HAZ- 1 determines that there are ACMs present, the criteria and standards of performance for removal would be completed in accordance with standard procedures set forth in SCAQMD Rule 1403. Therefore, COA HAZ-1 would not be deferred mitigation as the removal process pursuant to SCAQMD rule 1403 is required per the GMC. Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, and a Vapor Intrusion Risk Assessment (VIRE) were prepared for the Project to assess potential for hazardous materials and contamination; see **DEIR Section 4.6**. This comment is noted, and additional discussion to the regulatory setting and impact analysis in **DEIR Section 4.6: Hazards and Hazardous Materials** is included as shown below.

### **DEIR Section 4.6: Hazards and Hazardous Materials**

*DEIR Page 4.6-19*

Pursuant to GMC Section 18.42.200 (B), the Project is required to comply with the objective standards of the South Coast Air Quality Management District (SCAQMD) Rule 1403 for asbestos-containing materials. SCAQMD Rule 1403



provides requirements for demolition and renovation activities to include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials.

## **DEIR Section 4.6: Hazards and Hazardous Materials**

*DEIR Page 4.6-20*

The existing buildings were noted as a REC due to potential ACM and LBP. Demolition of the onsite buildings has the potential to cause airborne asbestos and LBP concentrations that would exceed federal and State thresholds and may pose an exposure risk for construction workers. Therefore, ACM and LBP would be removed or stabilized prior to demolition. Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite buildings. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of asbestos, and COA HAZ-2 includes measures to safely demolish structures containing potential LBP, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition. Further, GMC §18.42.200(B) requires the Project to comply with the objective standards of the SCAQMD Rule 1403, which provides requirements asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste material. Therefore, following compliance with COA HAZ-1, COA HAZ-2, and GMC §18.42.200(B), the potential presences of these materials would not result in a significant hazard to the public through reasonably foreseeable upset and accident conditions.

**A21-4** This comment states that the Project must include a statement of overriding considerations, and that the statement of overriding considerations must include a determination of the economic benefits of the Project, supported by substantial evidence, including whether the provision of employment opportunities for highly trained workers.

A statement of overriding considerations will be prepared alongside the Staff Report following completion of the Final EIR. The statement of overriding considerations will include relevant considerations, supported by substantial evidence, for why the benefits of the project outweigh any significant impacts. certain mitigation measures are infeasible. A statement of overriding considerations is not prepared or released as part of a Draft or Final EIR, nor would it be appropriate to do so. Furthermore, the



provision of highly trained workers is only one consideration that may be taken into account; it is not mandatory that employment is provided for such workers or that the EIR address this issue to make a statement of overriding considerations finding. Thus, the comment is noted, and no further response is necessary.

- A21-5** This comment summarizes and reiterates that SAFER has concerns regarding the Draft EIR and believes the Draft EIR should be recirculated. See responses A21-3 through A21-4. Again, this is a generalized statement that does not require a response.



**NOTE TO FILE NO. A22**

October 23, 2024

- A22-2 During a review of **DEIR Section 4.1: Air Quality** (Impact 4.1-3) a typo was found. Therefore, a revision has been made to **DEIR Section 4.1**; please see below.

**DEIR Section 4.1: Air Quality**

*DEIR Page 4.1-19*

~~Error! Reference source not found.~~ Table 4.1-8: Maximum Residential Receptor and Carcinogenic Risk presents the carcinogenic risk estimate for the maximum exposed residential receptor.

- A22-1 During a review of **DEIR Section 4.2: Cultural Resources** (Impact 4.3-2) a typo was found. Therefore, a revision has been made to **DEIR Section 4.2**; please see below.

**DEIR Section 4.2: Cultural Resources**

*DEIR Page 4.2-17*

The depth of excavation for the Project is approximately 60 feet below the surface, which would likely require excavation of underlying alluvial sediments and removal of the overlying artificial fill.

**DEIR Section 4.2: Cultural Resources**

*DEIR Page 4.2-19*

The maximum anticipated depth of excavation below the existing surface grade is estimated at 60 feet.



## 3.0 ERRATA TO THE DRAFT EIR

The responses included in **FEIR Section 2.0: Comment Letters and Responses**, may include text revisions to clarify or amplify information in the DEIR and/or appendices, as initiated by the Lead Agency or due to environmental issues raised in the comment letters. Should a response to a comment require DEIR revisions, the relevant DEIR text is presented in a box, with deleted text indicated by ~~strike through~~ and added text indicated by double underlining, as shown in the following example:

~~Deleted DEIR text~~ Added DEIR text

It is noted none of the corrections/clarifications identified in this section constitute “significant new information” pursuant to State CEQA Guidelines § 15088.5. The corrections/clarifications identified in this section merely clarify/amplify and make insignificant modifications to the DEIR. The corrections/clarifications involve only minor changes in the Project, but do not involve changes to the environmental setting or significant new information.

## 3.1 PUBLIC REVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

### DEIR Table of Contents

*DEIR Page xiii*

Appendix 4.7-2: Water Resources Analysis

Appendix 4.9-1: Noise Impact Study

Appendix 4.9-2: Operational Noise Analysis

### DEIR Section ES: Executive Summary

*DEIR Page ES-3*

- Redesignate the residential parcel at 16964 ~~179<sup>th</sup> Street~~ Brighton Avenue from Industrial to Single Family Residential and rezone from General Industrial Zone (M-2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.





## DEIR Section 2.0: Project Description

DEIR Page 2-10

The parcel immediately adjacent to the Project site’s southwest corner, at 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue, is occupied by a single-family residential (SFR) DU.

DEIR Page 2-10, Table 2-3: Surrounding Land Uses and Zoning

**Table 2-1: Surrounding Land Uses and Zoning**

Direction	Existing On-the-Ground Land Uses	Zoning <sup>1</sup>
North	North: West 169 <sup>th</sup> Street, with a 63-unit single-room occupancy multi-family development across the street, at 16819 South Normandie Avenue. Northwest: Single-family residential uses are west of South Normandie Avenue.	North: Industrial Zone (M-1) <sup>2</sup>  Northwest: Low-Density Multi-Family Residential Zone (R-2) <sup>3</sup>
South	South: West 170 <sup>th</sup> Street, with single-family residential uses across the street. Southwest: One single-family residential dwelling unit is immediately adjacent, at 16964 <del>West 179<sup>th</sup> Street</del> <u>Brighton Avenue</u> .	South: Single-Family Residential Zone (R-1) <sup>4</sup>  Southwest: General Industrial Zone (M-2) <sup>5</sup>
East	East: South Normandie Avenue and an existing UPRR track (north/south orientation) are immediately adjacent and to the east. Northeast/Southeast: Multi- and single-family residential uses are across South Normandie Avenue, respectively.	East: General Industrial Zone (M-2) <sup>5</sup>  Northeast: Normandie Estates Specific Plan <sup>6</sup> / Southeast: Single-Family Residential Zone (R-1) <sup>4</sup>
West	Brighton Way (an alleyway) is to the west, with single-family and duplex residential uses across the alley.	Low-Density Multiple Family Residential Zone (R-2) <sup>3</sup>

Notes:

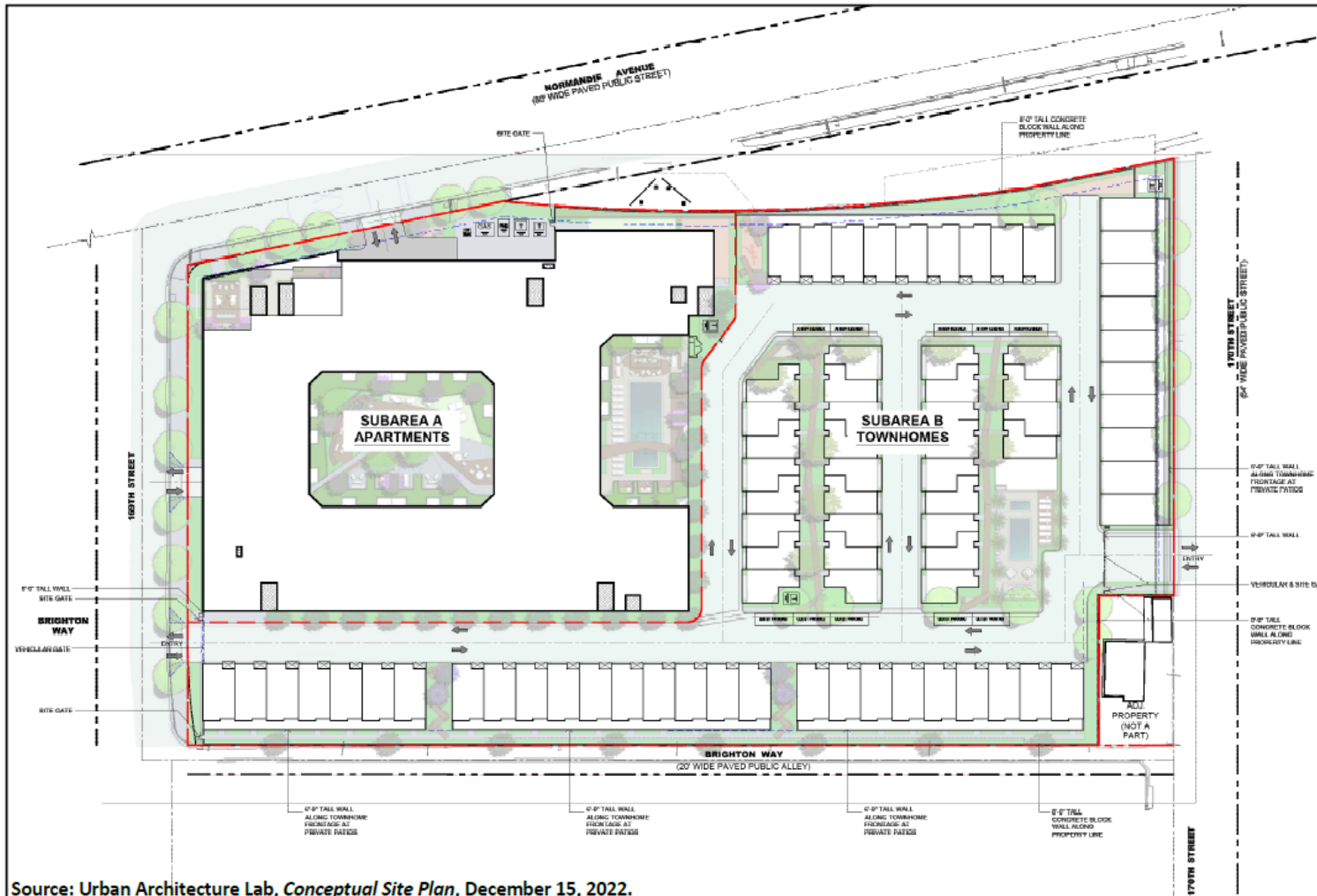
1. City of Gardena. (2020). Zoning. Available at [https://cityofgardena.org/wp-content/uploads/2020/11/Gardena\\_Zoning\\_2020.pdf](https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zoning_2020.pdf).
2. GMC Chapter 18.36: Industrial Zone (M-1). See GMC §18.36.040: Performance Standards, for property development standards.
3. GMC Chapter 18.14: Low-Density Multi-Family Residential Zone (R-2). See GMC §18.14.050: Property Development Standards, for property development standards.
4. GMC Chapter 18.12: Single-Family Residential Zone (R-1). See GMC §18.12.050: Property Development Standards, for property development standards.
5. GMC Chapter 18.38: General Industrial Zone (M-2). M-1 Zone performance standards apply; see GMC §18.36.040.
6. Normandie Estates Specific Plan single-family detached residential.
7. GMC §18.14.050: Property Development Standards.

DEIR Page 2-11

Additionally, the Project proposes to redesignate and rezone two parcels that are adjacent to the site and outside the proposed Specific Plan area to be consistent with existing uses, as depicted on Exhibit 2-2. These areas include the residential parcel at 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue and the UPRR parcel immediately adjacent and east of the Project site.



**DEIR Page 2-13, Exhibit 2-4: Conceptual Site Plan**  
 (Previous Conceptual Site Plan dated December 15, 2022)



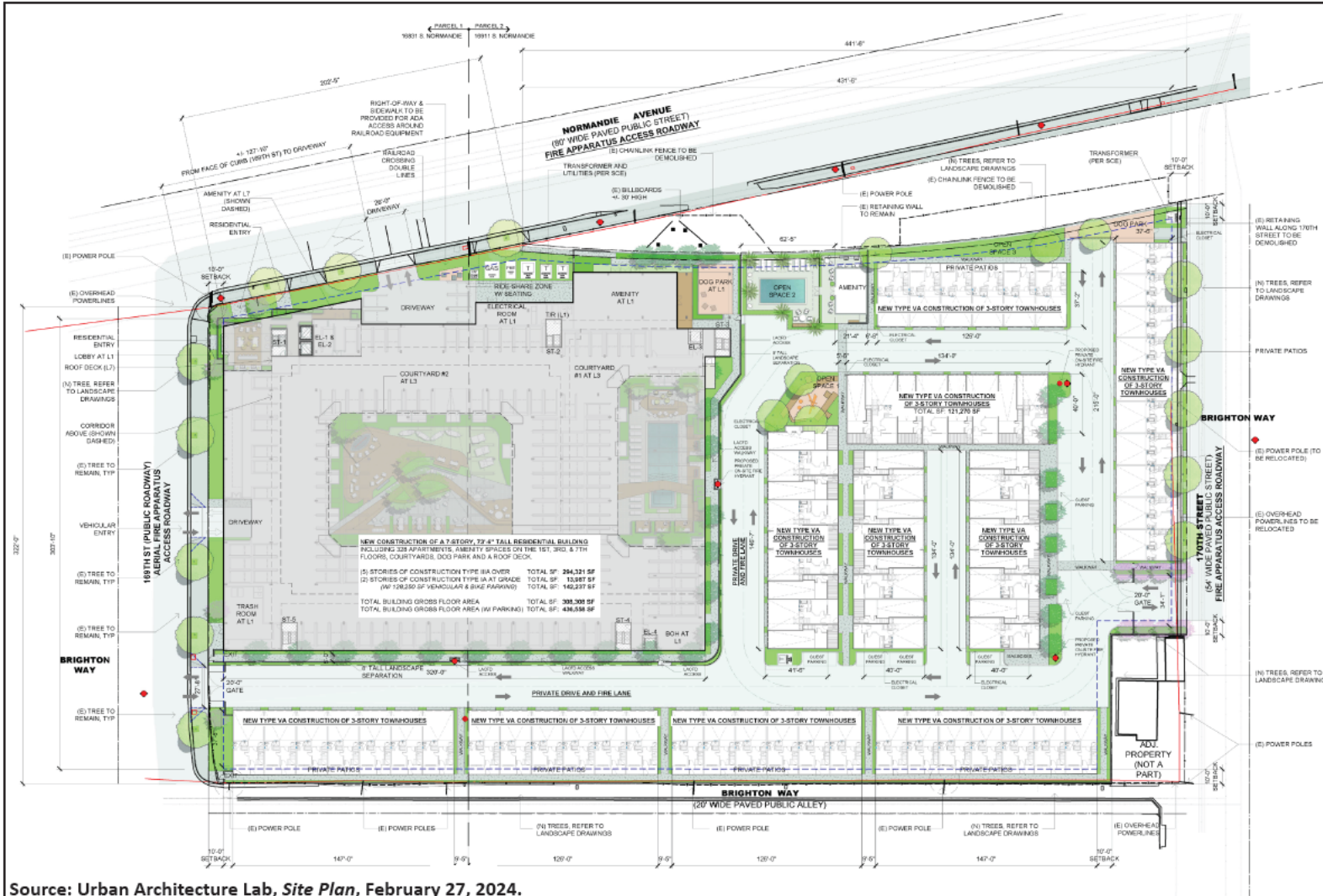
Source: Urban Architecture Lab, *Conceptual Site Plan*, December 15, 2022.

**EXHIBIT 2-4: CONCEPTUAL SITE PLAN**  
 Normandie Crossing Specific Plan Project





(Revised Conceptual Site Plan dated February 27, 2024)



Source: Urban Architecture Lab, *Site Plan*, February 27, 2024.

**EXHIBIT 2-4: CONCEPTUAL SITE PLAN**  
 Normandie Crossing Specific Plan Project

NOT TO SCALE



DEIR Page 2-15

Additionally, the Project proposes approximately ~~50,493~~ 44,420 total SF of open space, comprised of approximately ~~20,150~~ 13,600 SF of private open space and approximately ~~30,343~~ 32,820 SF of common open space. The Project proposes approximately 20,432 SF of planting areas, including approximately 10,553 SF within Subarea A and approximately 9,879 SF within Subarea B.

DEIR Page 2-15, Table 2-4: Land Use Summary – Proposed Project

Table 2-2: Land Use Summary - Proposed Project

Description	Industrial (Square Feet) <sup>1</sup>	Residential <sup>1</sup>	
		(Gross Square Feet)	(Dwelling Units)
Industrial (to be removed)	-115,424	-	-
Industrial (to be removed, but excluded from Project impact offsets)	9,324		
Apartment Building	-	308,308	328
Townhome-Style Residential	-	<del>120,673</del> <u>121,270</u>	75
<b>Project Total</b>	<b>-106,100</b>	<b><del>+428,981</del> <u>+429,578</u></b>	<b>+403</b>
Notes:			
1. See Table 2-1.			
2. Urban Architecture Lab ( <del>2022</del> <u>2024</u> ). 16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.			

DEIR Page 2-15

The Project proposes an approximately 308,308-SF apartment building with 328 DU at a density of approximately ~~155~~ 154 DU/AC.

DEIR Page 2-15

Each Subarea A unit would be provided a minimum of ~~50~~ 9,850 SF of private open space. The common open space amenities proposed in Subarea A total approximately ~~22,698~~ 22,140 SF and include: roof deck with BBQs and seating areas; swimming pool with BBQ and seating areas; a dog park fitness room; club houses; and a courtyard with seating area.



DEIR Page 2-16, Table 2-5: Land Use Summary – Proposed Apartment Building<sup>1</sup>

Table 2-3: Land Use Summary – Proposed Apartment Building<sup>1</sup>

Level	Description	Floor Area <sup>2</sup> (Square Feet)	Dwelling Units
L1	Lobby	<del>2,800</del> <u>2,080</u>	
	Amenity I: Fitness Room	<del>2,682</del> <u>2,526</u>	
L2 - L7	Apartment Units	<del>241,109</del> <u>241,065</u>	328 (68 Studio, 194 1-Bedroom, 66 2- Bedroom)
	Balconies (Covered) <sup>4</sup>	6,991	
L3	Amenity II: Courtyard	<del>1,446</del> <u>1,332</u>	
	Amenity III: Pool Court	<del>1,500</del> <u>1,382</u>	
L4	Amenity IV: BBQ Covered Dining Area	<del>795</del> <u>725</u>	
Other	Other <sup>3</sup>	<del>50,985</del> <u>52,207</u>	
<b>Total</b>		<b><del>308,308</del></b>	

Notes:

1. Urban Architecture. (2022-2024). 16911 Normandie Apartments & Townhomes Entitlement Set.
2. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
3. Other = Circulation, stairs, elevator shafts, trash vestibules, and trash rooms.
4. Only covered portions of balconies are included in the floor area calculation.

DEIR Page 2-16

- Vehicle Parking, 195 Spaces: ~~135~~ 155 Standard, ~~20 electric vehicle charging (one of which is a van electric vehicle charging),~~ and 8 accessible, and 32 tandem.

DEIR Page 2-16

- Vehicle Parking, 204 Spaces: ~~150~~ 170 Standard and ~~20 electric vehicle charging~~ and 34 tandem.

The apartment building would provide 20 spaces with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit, raceway, and receptacles. The EV parking spaces would be distributed between the building's first two levels.

DEIR Page 2-16

Up to ~~90~~ 66 spaces could be tandem; tandem spaces could only be rented as a pair to a single unit.



DEIR Page 2-16

The Project proposes 75 townhome-style units in ~~nine~~ ten buildings (totaling approximately ~~120,673~~ 121,270 gross SF), at a density of approximately 24 DU/AC.

DEIR Page 2-17

The ~~various~~ proposed townhome product types are ~~30 two-bedroom,~~ 35 65 three-bedroom, and 10 four-bedroom units.

DEIR Page 2-17, Table 2-6: Land Use Summary – Proposed Townhomes

Table 2-4: Land Use Summary – Proposed Townhomes

Level	Description	Floor Area <sup>1</sup> (Square Feet)	Dwelling Units
L1-L3	Townhouses	<del>115,982</del> <u>119,480</u>	<del>30 two-bedroom</del> <u>35</u> <u>65</u> three-bedroom 10 four-bedroom
	Balconies (Covered) <sup>2</sup>	<del>3,916</del> <u>1,190</u>	
L1	Amenity V	<del>775</del> <u>600</u>	
	<b>Subtotal</b>	<b><del>120,673</del> <u>121,270</u></b>	

Source: Urban Architecture. (~~2022~~ 2024). 16911 Normandie Apartments & Townhomes Entitlement Set.

Notes:

1. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
2. Only covered portions of balconies are included in the floor area calculation.

DEIR Page 2-17

The common open space amenities proposed in Subarea B total approximately ~~7,645~~ 8,680 SF and include the following: swimming pool with BBQ and seating areas; dog park; club house; and ~~patios with seating areas~~ playground.

DEIR Page 2-19

- Removing approximately 170 linear feet of railroad spur track, ~~which enters the Project site on UPRR property and that~~ formerly served the southernmost industrial building (i.e., 16911 South Normandie Avenue).

DEIR Page 2-19

**Residential Parcel at ~~16964 179<sup>th</sup> Street~~ Brighton Avenue**

Concerning the SFR parcel immediately adjacent to the Project site's southwest corner (not a part of the Specific Plan area) at ~~16964 West 179<sup>th</sup> Street~~ Brighton Avenue, the Project proposes to redesignate the parcel from Industrial to Single Family Residential, and rezone from General



Industrial Zone (M 2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.

*DEIR Page 2-22*

- Concerning the residential parcel at 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue, a General Plan amendment to change the land use designation on the General Plan Land Use Map from Industrial to Single-Family Residential; and rezone from General Industrial Zone (M2) to Single Family Residential Zone (R-1) consistent with existing residential land use.

*DEIR Page 2-22*

- Concerning the residential parcel at 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue, a zoning map amendment to change the zone on the Zoning Map from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone; and

## **DEIR Section 4.1: Air Quality**

*DEIR Page 4.1-1*

It is noted, the Air Quality Report and Health Risk Assessment identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified (“February 2024 Conceptual Site Plan”). Section 2.3: Project Characteristics describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the Air Quality Report and Health Risk Assessment significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s Air Quality Report and Health Risk Assessment; see **Appendix 4.1-1 and Appendix 4.1-2**.

*DEIR Page 4.1-19*

~~Error! Reference source not found.~~ Table 4.1-8: Maximum Residential Receptor and Carcinogenic Risk presents the carcinogenic risk estimate for the maximum exposed residential receptor.

## **DEIR Section 4.2: Cultural Resources**

*DEIR Page 4.2-17*

The depth of excavation for the Project is approximately 60 feet below the surface, which would likely require excavation of underlying alluvial sediments and removal of the overlying artificial fill.



*DEIR Page 4.2-19*

The maximum anticipated depth of excavation below the existing surface grade is estimated at 60 feet.

**DEIR Section 4.3: Energy**

*DEIR Page 4.3-1*

It is noted, the Energy Assessment and Air Quality Report identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified (“February 2024 Conceptual Site Plan”). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the Energy Assessment and Air Quality Report significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s Air Quality Technical Report; see **Appendix 4.1-1**.

*DEIR Page 4.3-13*

Additionally, the Project’s proposed apartment building would provide 1.2 parking spaces per unit, including approximately ~~40 electric vehicle (EV) spaces~~ 20 spaces with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit, raceway, and receptacles which would ~~to~~ encourage carpooling or other alternate modes of transportation.

**DEIR Section 4.5: Greenhouse Gas Emissions**

*DEIR Page 4.5-1*

It is noted, the GHG Technical Report identified above was based on an earlier Conceptual Site Plan, which has since been slightly modified (“February 2024 Conceptual Site Plan”). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the GHG Technical Report significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.





DEIR Page 4.5-27, Table 4.5-2: Summary of Construction GHG Emissions

Table 4.5-5: Summary of Construction GHG Emissions

Calendar Year	Total Off-Road Emissions	Total On-Road Emissions			Total Construction Emissions <sup>1</sup>
		Worker	Vendor	Hauling	
(MT CO <sub>2</sub> e)					
<del>2021</del> 2024	234.36	39.86	23.61	<del>52.25</del> 53.52	<del>350.09</del> 351.35
<del>2022</del> 2025	365.09	301.17	38.28	–	704.53
<del>2023</del> 2026	364.32	375.53	56.40	–	796.25
<del>Total</del> 2027	238.75	244.91	37.10	–	520.76
<b>Total</b>	<b><u>1,202.52</u></b>	<b><u>961.47</u></b>	<b><u>155.38</u></b>	<b><u>53.52</u></b>	<b><u>2,372.89</u></b>
<b>30-year Amortized</b>					<b>79</b>
1. Construction emissions include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod. CO <sub>2</sub> e includes CO <sub>2</sub> , CH <sub>4</sub> , and N <sub>2</sub> O emissions, weighted by their respective global warming potentials. 2. CalEEMod - California Emissions Estimator Model CH <sub>4</sub> = methane; CO <sub>2</sub> = carbon dioxide; CO <sub>2</sub> e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N <sub>2</sub> O = nitrous oxide; yr = year					
Source: Ramboll US Corporation. (2023). Greenhouse Gas Technical Report Table 7; see Appendix 4.5-1.					

DEIR Page 4.5-30, Table 4.5-4: City of Gardena Climate Action Plan Analysis

Table 4.5-6: City of Gardena Climate Action Plan Analysis

Strategy	Goal	Project Analysis
Land Use and Transportation (LUT)	A Accelerate the market for EV vehicles	<b>No Conflict.</b> The Project would designate approximately 40 percent of the 399 parking stalls in the apartment building to be capable, ready, or equipped for EV Chargers. More specifically, the Project would provide 10 percent of parking stalls to be EV capable, 25 percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stall to be equipped with Level 2 EV Chargers.
	B Encourage ride-sharing	<b>No Conflict.</b> A designated loading area at the apartment building along Normandie Avenue would be signed and distinguished (e.g., with paving and/or paint) such that it may be utilized as a pick-up and drop-off zone for ride-sharing services.
	C Encourage transit usage	<b>No Conflict.</b> Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166 <sup>th</sup> Street. The Project includes ROW improvements along 169 <sup>th</sup> Street which would create a continuous pedestrian path and allow



Strategy	Goal		Project Analysis
			<p>greater access to public transit opportunities. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. Per the NCSP, new <u>apartment</u> residents who sign a 12-month lease would be offered a one-time free monthly Metro pass.</p>
	D	Adopt active transportation initiatives	<p><b>No Conflict.</b> The Project would provide 173 bicycle parking spaces on the first level of the apartment building (located in secured facilities accessible only by apartment building residents). All bicycle parking would be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.</p>
	E	Parking strategies	<p><b>No Conflict.</b> The vehicle parking spaces would be unbundled from the rental of the apartment units to encourage alternate modes of transportation.</p>
	F	Organizational strategies	<p><b>No Conflict.</b> The proposed apartment amenities include a multi-purpose office space to provide workspace for residents that work from home. Additionally, this amenity would encourage future residents to telecommute work and therefore reduce VMT.</p>
	G	Land use strategies	<p><b>No Conflict.</b> The Project proposes 403 DU at a density of 77 (DU/AC). The apartment building would provide <del>155</del> <u>154</u> DU/AC and the townhomes would provide 24 DU/AC.</p>
	H	Digital technology strategies	<p><b>No Conflict.</b> The Project buildings would be capable of connection to a future fiber network in order to implement the South Bay Fiber-Optic Master Plan.<sup>1</sup></p>
Energy Efficiency (EE)	A	Increase energy efficiency in existing residential units	<p><b>Not Applicable.</b> The Project does not involve existing residential units.</p>
	B	Increase energy efficiency in new	<p><b>No Conflict.</b> The Project would be built to meet the California Green Building Code. Additionally, the proposed pools would use electricity for</p>

<sup>1</sup> Magellan Advisors. (2017). *Fiber-Optic Master Plan – Prepared for the South Bay Workforce Investment Board and the South Bay Cities Council of Governments.*



Strategy	Goal	Project Analysis
	residential developments	filters, pumps, and water heating rather than natural gas.
	<b>C</b> Increase energy efficiency in existing commercial units	<b>Not Applicable.</b> The Project site is currently occupied by industrial uses.
	<b>D</b> Increase energy efficiency in new commercial developments	<b>Not Applicable.</b> The Project includes only residential uses.
	<b>E</b> Increase energy efficiency through water efficiency	<b>No Conflict.</b> The Project would be subject to compliance with the California Green Building Code, which requires that indoor potable water use be reduced by 20 percent through the use of water saving fixtures and/or flow restrictions.
	<b>F</b> Decrease energy demand through reducing urban heat island effect	<b>No Conflict.</b> The Project would reduce the impervious surface area by <del>13.8</del> <u>approximately 8.6</u> percent, thereby reducing the temperature of the site and surrounding area. The Project would also provide shade from providing <del>89</del> <u>75</u> new trees.
	<b>G</b> Participate in education, outreach, and planning for energy efficiency	<b>Not Applicable.</b> The Project is a new residential development, and as such, would not directly be involved in planning for energy efficiency.
	<b>H</b> Increase energy efficiency in municipal buildings	<b>Not Applicable.</b> The Project is a new residential development.
	<b>I</b> Increase energy efficiency in city infrastructure	<b>Not Applicable.</b> The Project is a new residential development, and as such, would not directly be involved in planning for the City’s infrastructure efficiency.
	<b>J</b> Reduce energy consumption in the long- term	<b>No Conflict.</b> New residential and non-residential buildings would be subject to the 2022 Title 24 Part 6 Building Code.
<b>Solid Waste (SW)</b>	<b>A</b> Increase Diversion and Reduction of Residential Waste	<b>No Conflict.</b> The Project would be subject to compliance with the state’s waste diversion goal of 75 percent waste diversion by 2020.
	<b>B</b> Increase Diversion and Reduction of Commercial Waste	<b>Not Applicable.</b> The Project is a new residential development.
	<b>C</b> Reduce and Divert Municipal Waste	<b>Not Applicable.</b> The Project is a new residential development.



Strategy	Goal	Project Analysis
Urban Greening (UG)	A	Increase and maintain urban greening in the community <b>No Conflict.</b> The Project includes an increase of approximately <del>50,493</del> <u>44,420</u> SF of open space and proposed to plant 75 new trees.
	B	Increase and maintain urban greening in municipal facilities <b>Not Applicable.</b> The Project does not involve municipal facilities.
Energy Generation & Storage (EGS)	A	Support energy generation and storage in the community <b>Not Applicable.</b> The Project is a new residential development, which would be serviced by SCE.

Sources: Refer to Exhibit 2-4: Conceptual Site Plan and Appendix 4.5-1 for assumptions used in this analysis.

DEIR Page 4.5-30, Table 4.5-5: RTP/SCS Goals and Analysis

Table 4.5-7: RTP/SCS Goals Analysis

Goal	Project Analysis
Goal 1 Encourage regional economic prosperity and global competitiveness.	<b>Not Applicable.</b> The Project proposes residential uses only.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>No Conflict.</b> The Project includes ROW improvements along West 169 <sup>th</sup> Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. The Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169 <sup>th</sup> Street (between Brighton Way and South Normandie Avenue), on the north side of West 170 <sup>th</sup> Street (between Brighton Way and South Normandie Avenue), on the west side of South Normandie Avenue (between West 169 <sup>th</sup> Street and West 170 <sup>th</sup> Street), and on the east side of Brighton Way (between West 169 <sup>th</sup> Street and West 170 <sup>th</sup> Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169 <sup>th</sup> Street, just west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. Additionally, the Project includes railroad improvements on Normandie Avenue. Both ROW and Railroad improvements would upgrade existing infrastructure and increase mobility, reliability, and travel safety for people and goods.



Goal		Project Analysis
<b>Goal 3</b>	Enhance the preservation, security, and resilience of the regional transportation system.	<b>No Conflict.</b> The Project includes railroad improvements on Normandie Avenue. These improvements would enhance the preservation, security, and resilience of the regional transportation system.
<b>Goal 4</b>	Increase person and goods movement and travel choices within the transportation system.	<b>No Conflict.</b> The Project includes sidewalk improvements, as described in Goal 2 above. The Project also proposes railroad track improvements along South Normandie Avenue, which include the following: <ul style="list-style-type: none"> <li>• Removing the <u>approximately 170 linear feet of railroad spur track, which enters the project site on UPRR property.</u></li> <li>• Removing approximately 830 linear feet of railroad spur currently located along the Project site’s eastern boundary.</li> <li>• A new median both north and south of the track alignment, and</li> <li>• New warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks.</li> <li>• Refreshing railroad crossing pavement markings immediately north and south of the track alignment.</li> </ul>
<b>Goal 5</b>	Reduce greenhouse gas emissions and improve air quality.	<b>No Conflict.</b> The Project site is in an urban area near existing transit routes and freeways. The Project’s location within an urbanized, walkable area would reduce trip lengths, which would reduce GHG and air quality emissions.
<b>Goal 6</b>	Support healthy and equitable communities	<b>No Conflict.</b> The Project does not exceed South Coast AQMD’s regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the South Coast AQMD’s localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.
<b>Goal 7</b>	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<b>Not Applicable.</b> This is not a project-specific goal.
<b>Goal 8</b>	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>No Conflict.</b> As mentioned previously, the Project would designate approximately 40 percent of the <del>559</del> <u>399 apartment</u> parking stalls to be capable, ready, or equipped for EV Chargers. Each



Goal		Project Analysis
		townhome unit would have one EV ready space within each garage. Additionally, a designated loading area at the apartment building along Normandie Avenue would be signed and distinguished (e.g., with paving and/or paint) so that it may be used as a pick-up and drop-off zone for ride-sharing services.
<b>Goal 9</b>	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<b>No Conflict.</b> The Project proposes various housing types that would provide diverse housing options and be served by public transit located within approximately 0.25 mile of the Project site. Existing GTrans bus stops are located less than 600 feet north of the Project site along 166 <sup>th</sup> Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile south of the Project site, providing more access to public transit opportunities. The Project includes ROW improvements along 169 <sup>th</sup> Street, which would create a continuous pedestrian path and allow greater access to public transit opportunities. Further, the Project would provide new <u>apartment</u> residents who sign a 12-month lease one free monthly Metro pass.
<b>Goal 10</b>	Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Not Applicable.</b> The Project site is not located on agricultural lands and does not contain native habitat.

Source: Southern California Association of Governments. (2020). *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy)*.

## DEIR Section 4.6: Hazards and Hazardous Materials

DEIR Page 4.6-9

According to California Division of Oil, Gas and Geothermal Resources (CalGEM), ~~no oil or gas wells are located on~~ one abandoned “dry hole” “wildcat” well, identified as “Gardena E.H”, exists 121 feet north and 55 feet east from the intersection of 170<sup>th</sup> Street and Brighton Way thereby placing the well within the parking area east of the southernmost building. There are no oil or gas wells located or immediately adjacent to the site. ~~The closest well was identified to be located approximately 480 feet south of the site and is reported as “abandoned”.~~



*DEIR Page 4.6-19*

Pursuant to GMC Section 18.42.200 (B), the Project is required to comply with the objective standards of the South Coast Air Quality Management District (SCAQMD) Rule 1403 for asbestos-containing materials. SCAQMD Rule 1403 provides requirements for demolition and renovation activities to include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials.

*DEIR Page 4.6-20*

The existing buildings were noted as a REC due to potential ACM and LBP. Demolition of the onsite buildings has the potential to cause airborne asbestos and LBP concentrations that would exceed federal and State thresholds and may pose an exposure risk for construction workers. Therefore, ACM and LBP would be removed or stabilized prior to demolition. Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite buildings. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of asbestos, and COA HAZ-2 includes measures to safely demolish structures containing potential LBP, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition. Further, GMC §18.42.200(B) requires the Project to comply with the objective standards of the SCAQMD Rule 1403, which provides requirements asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste material. Therefore, following compliance with COA HAZ-1, COA HAZ-2, and GMC §18.42.200(B), the potential presences of these materials would not result in a significant hazard to the public through reasonably foreseeable upset and accident conditions.

*DEIR Page 4.6-21*

As previously addressed, the Phase I ESAs identified various onsite RECs associated with past uses of the Project site. As discussed in Section 4.6.1: Existing Setting, there is an existing abandoned well within the Project site where townhomes are proposed. This well is already abandoned and would be capped during Project construction in coordination with CALGEM.

## **DEIR Section 4.7: Hydrology and Water Quality**

*DEIR Page 4.7-1*

Information in this section is based primarily on hydrology and water quality data provided in **Appendix 4.7-1: Water Resources Technical Report** ("Water Resources Technical Report").



DEIR Page 4.7-1

It is noted, the Water Resources Technical Report was based on an earlier Conceptual Site Plan, which has since been slightly modified (“February 2024 Conceptual Site Plan”). Section 2.3: Project Characteristics describes the proposed Project based on the February 2024 Conceptual Site Plan. A follow-up 16911 S Normandie Water Resources Technical Report and Updated Entitlements Package Dated February 27, 2024 (“Water Resources Analysis”) (Fusco Engineering, March 7, 2024) (see Appendix 4.7-2) was conducted to analyze the February 2024 Conceptual Site Plan. The Water Resources Analysis found the Water Resources Technical Report’s significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s Water Resources Technical Report; see **Appendix 4.7-1**.

DEIR Page 4.7-17

The Project proposes various exterior open spaces, thus, would increase the Project site’s pervious surfaces from almost nothing (0.3 percent) to ~~14.1~~ approximately 8.6 percent.

DEIR Page 4.7-18

The proposed Project would result in an increase in landscaped areas throughout the Project site, which would decrease impervious surfaces from 99.7 percent under existing conditions to ~~85.9~~ 91.1 percent under proposed Project conditions.

DEIR Page 4.7-19, Table 4.7-4: Existing Versus Proposed Drainage Conditions

**Table 4.7-8: Existing Versus Proposed Drainage Conditions**

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
Existing	5.25	99.70	10.61	13.80	16.76
Proposed	5.25	<del>85.9</del> <u>91.1</u>	9.18	12.10	14.80
Difference	0	<del>13.8</del> <u>8.6</u>	1.43	1.70	1.96
% Change from Existing to Proposed Conditions	-	<del>-13.8%</del> <u>-8.6%</u>	-13.5%	-12.3%	-11.7%

Source: **Appendix 4.7-1**, Table 6

DEIR Page 4.7-24

Fusco Engineering, Inc. (2024). 16911 S Normandie Water Resources Technical Report and Updated Entitlements Package Dated February 27, 2024; see Appendix 4.7-2.





## DEIR Section 4.8: Land Use and Planning

DEIR Page 4.8-5

- **Southwest:** As noted above, there is one single-family residential dwelling unit immediately adjacent to the Project site and to the southwest, at 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue.

DEIR Page 4.8-7

The parcel immediately adjacent to the Project site’s southwest corner, at 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue, and the parcel immediately adjacent and east of the Project site are both designated Industrial.

DEIR Page 4.8-11

The multi-family residential development proposes two types of residential uses: an apartment building with 328 DU at the Project site’s northern portion; and 75 townhome-style units within ~~nine~~ ten buildings; see **Exhibit 2-4: Conceptual Site Plan**.

DEIR Page 4.8-11, **Table 4.8-4: Gardena General Plan 2006 Analysis**

**Table 4.8-9: Gardena General Plan 2006 Analysis**

General Plan Policy	Project Analysis
<b>Community Development Element: Land Use Plan</b>	
<b>LU Goal 1:</b> Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City.	
<b>Policy LU 1.1:</b> Promote sound housing and attractive and safe residential neighborhoods.	<b>No Conflict.</b> The NCSP would implement new zoning and development standards to promote development of high-quality housing in the City. The Project facilitates the surrounding neighborhood’s transition into a more complete community, in that it would bring new residents to the neighborhood, bring new housing to this area, improve the streetscape, and activate the pedestrian realm.
<b>Policy LU 1.2:</b> Protect existing sound residential neighborhoods from incompatible uses and development.	<b>No Conflict.</b> Factors influencing land use compatibility include aesthetics, air quality, noise, and traffic. As concluded in <b>Section 4.2: Air Quality</b> , <b>Section 4.9: Noise</b> , <b>Section 4.13: Transportation</b> , and <b>Section 4.16 Aesthetics</b> , respectively, the Project would result in less than significant operational impacts concerning these resource areas, which in turn would influence land use compatibility. The surrounding properties include single- and multi-family land uses. Therefore, the Project would



General Plan Policy	Project Analysis
	be a compatible land use and would involve removal of potentially incompatible industrial uses with NCSP approval.
<p><b>Policy LU 1.4:</b> Locate new medium- and high-density residential developments near neighborhood and community shopping centers with commensurate high levels of community services and facilities.</p>	<p><b>No Conflict.</b> Commercial uses and services are located approximately 0.16 mile south of the Project site at the Artesia Boulevard at Normandie Avenue intersection. These shopping centers are characterized by commercial and retail uses that would provide community services and facilities to the Project’s future residents. Additionally, the Project would cluster urban-density housing at an appropriate location in the vicinity of the Harbor Gateway Transit Center, which would offer easy access to public transportation and reduce their automobile dependence.</p>
<p><b>Policy LU 1.5:</b> Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multi-family residential developments.</p>	<p><b>No Conflict.</b> The Project would incorporate quality residential amenities, including private and community open spaces. The Project’s apartment amenities include a fitness room, dog park, and bike room on the ground level; pools, BBQ’s and courtyards with fire pits on level three; and a roof deck and club room on level seven. The Project’s townhome amenities include a dog park, <del>passes</del> <u>playground</u>, courtyard with BBQ’s and fire pits, and a pool. The Project provides adequate residential amenities which would create more attractive and livable spaces for residents. The Project would also provide approximately 399 off-street vehicle and 173 bicycle parking spaces.</p>
<p><b>Policy LU 1.6:</b> Ensure residential densities are compatible with available public service and infrastructure systems.</p>	<p><b>No Conflict.</b> The Project permits residential density compatible with available public service and infrastructure systems. As described in <b>Section 4.12: Public Services and Recreation</b>, and <b>Section 4.15: Utilities and Service Systems</b>, the Project includes measures to ensure that the plan area is served by adequate public services, infrastructure, and utilities.</p>
<p><b>Policy LU 1.8:</b> Minimize through-traffic on residential streets.</p>	<p><b>No Conflict.</b> The Project proposes three vehicle access points at 169<sup>th</sup> Street (north), 170<sup>th</sup> Street (south), and Normandie Avenue (east). 169<sup>th</sup> Street and 170<sup>th</sup> Street are classified as Local Streets in the GGP. Traffic on these two roadways proceed to Normandie Avenue, which is classified as a Major Collector. The Project minimizes through-traffic on residential streets by orienting vehicular access towards Normandie Avenue.</p>



General Plan Policy	Project Analysis
<b>Community Development Element: Economic Development Plan</b>	
<b>ED Goal 3:</b> Attract desirable businesses to locate in the City.	
<p><b>Policy ED 3.3:</b> Maintain a multidisciplinary proactive approach to improve the City’s image as a desirable business location.</p>	<p><b>No Conflict.</b> The Project facilitates the development of quality housing near local technology and creative sector companies and other employment centers to further attract desirable businesses to locate in the City. Innovative technology firms and their employees place a premium on quality-of-life and livability factors, including access to quality housing options; social, cultural, and environmental amenities; access to shops and restaurants; and low-stress commutes. Project implementation would help alleviate the negative impacts of a lack of housing for local technology and creative sector employees. The Project adopts a multi-disciplinary, proactive approach, balancing job growth in the expanding technology sector with new high-quality housing opportunities to enable local employees to live close to where they work.</p>
<b>Community Development Element: Community Design Plan</b>	
<b>DS Goal 1:</b> Enhance the visual environment and create a positive image of the City.	
<p><b>Policy DS 1.3:</b> Promote a stronger design review process to ensure that public and private projects comply with best design practices and standards.</p>	<p><b>No Conflict.</b> The Project has been subject to City review and approval to ensure that future development is held to quality design practices and standards.</p>
<p><b>Policy DS 1.4:</b> Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.</p>	<p><b>No Conflict.</b> The Project would enhance the visual environment by replacing obsolete, industrial warehouse buildings with a new multi-family development. The Project would incorporate high-quality design and landscaping consistent with the Specific Plan standards. Developing new residential uses in proximity to growing local technology and creative sector industries would help create a positive image of the City. The Project would provide onsite landscaping features and a high-quality sign identifying the Project, consistent with GMC Chapter 18.58 sign standards, at a key gateway location in the City.</p>
<b>DS Goal 2:</b> Enhance the aesthetic quality of the residential neighborhoods in the City.	
<p><b>Policy DS 2.1:</b> Provide stronger design guidelines for residential development, including both new construction and additions to existing single-family units or multi-family dwellings.</p>	<p><b>No Conflict.</b> The Project is intended to achieve quality and attractively designed development that can serve as a model for future multi-family development in the City. The Project would replace aged and dilapidated industrial warehouse buildings with a residential development that is intended to serve as a catalyst to transform southeast Gardena into a multi-family neighborhood.</p>
<p><b>Policy DS 2.2:</b> Ensure that new and remodeled dwelling units are designed with</p>	



General Plan Policy	Project Analysis
<p>architectural styles, which are varied and are compatible in scale and character with existing buildings and the natural surroundings.</p>	
<p><b>Policy DS 2.3:</b> Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.</p>	<p><b>No Conflict.</b> The NCSP development standards would ensure the development includes a variety of massing, floorplans, color schemes, façade treatments, elevations, and wall articulations.</p>
<p><b>Policy DS 2.7:</b> Require appropriate setbacks, massing, articulation and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing.</p>	<p><b>No Conflict.</b> The apartment building portion of the Project design and access is oriented towards Normandie Avenue and away from the nearest single-family housing located to the south and west of the Project site. Further, the Project appropriately transitions building massing from a single- to multi-family scale by locating the townhome style buildings along the Project boundary that borders single-family housing (south and west) and the apartment building near the multi-family apartments (north) and Normandie Avenue (east).</p>
<p><b>Policy DS 2.9:</b> Integrate new residential developments with the surrounding built environment. In addition, encourage a strong relationship between the dwelling and the street.</p>	
<p><b>Policy DS 2.10:</b> Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a “greener” environment for residents and those viewing from public areas.</p>	<p><b>No Conflict.</b> The Project would provide landscape treatments that would create a “greener” environment. The Project would replace existing industrial warehouses with a multi-family residential building that incorporates street trees to shade the street and sidewalk and create a pedestrian-scale screen between the ground level and upper levels of the building. The upper-level courtyards would all be landscaped and visible from the street, further enhancing the “green” environment for residents and those viewing from public areas.</p>
<p><b>Policy DS 2.11:</b> Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy.</p>	<p><b>No Conflict.</b> The Project would incorporate quality residential amenities, including <del>16,120</del> <u>13,600</u> SF of private and <del>32,900</del> <u>32,820</u> SF of community open spaces. The Project’s apartment amenities include a fitness room, dog park, pool, and bike room on the ground level; pools, BBQs and courtyards on level 3; and a roof deck and club room on level 7. The Project’s townhome amenities include a dog park, <del>paseos</del> <u>playground</u>, courtyard with BBQs, and a pool. These amenities would create more attractive and livable spaces for residents to enjoy.</p>
<p><b>Policy DS 2.12:</b> Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.</p>	<p><b>No Conflict.</b> The apartment building portion of the Project would provide parking in an enclosed garage consisting of two vertical floors, starting at the ground level. The parking garage would be accessible only to residents and would be secured by a key fob entry</p>



General Plan Policy	Project Analysis
	system. Residents would be able to enter the building directly from the parking garage. The townhome units would have enclosed parking garages.
<p><b>Policy DS 2.14:</b> Require design standards be established to provide for attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.</p>	<p><b>No Conflict.</b> The Project includes design guidelines to ensure that the Project is designed with a varied but cohesive architectural style. These design standards would ensure that the Project would be designed with attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.</p>
<p><b>Policy DS 2.15:</b> Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.</p>	<p><b>No Conflict.</b> The Project would provide a new high-quality residential development through Specific Plan implementation, which would conform to the latest CALGreen sustainability standards and encourage attractive architectural design and features to stimulate residential development and protect the environment.</p>
<p><b>Community Development Element: Circulation Plan</b></p>	
<p><b>CI Goal 1:</b> Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.</p>	
<p><b>Policy CI 1.1:</b> Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.</p>	<p><b>No Conflict.</b> The Project’s apartment building portion would provide 173 bicycle parking spaces and 399 auto parking spaces, consistent with the NCSP but less than the City’s parking requirements, providing 1.2 parking spaces per apartment unit. As such, the Project would discourage multi-vehicle households. Providing less parking spaces per unit encourages residents to carpool or seek alternative modes of transportation. The Project further promotes use of multi-modal transportation networks through its close proximity to such networks. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. Further, per the NCSP, new residents who sign a 12-month lease would be offered one free monthly Metro pass. The Project would provide two parking spaces per townhouse unit, plus 10 guest parking spaces.</p>
<p><b>CI Goal 3:</b> Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.</p>	



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<p><b>Policy CI 3.1:</b> Work with Gardena Municipal Bus Lines and MTA to increase the use of public transit, establish or modify routes, and improve connectivity to regional services.</p>	<p><b>No Conflict.</b> Transit and pedestrian facilities exist near the Project site. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. To improve access to public transportation, the Project includes the construction of onsite and offsite sidewalks in this area. The Project includes the construction of sidewalks per Local Street requirements along the south side of 169<sup>th</sup> Street, Brighton Way (west), and 170<sup>th</sup> Street (south). Additionally, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169<sup>th</sup> Street. The Project, with the incorporation of these sidewalk improvements, would improve connectivity to regional services and promote alternative modes of transportation for residents. Further, the NCSP proposes that new residents who sign a 12-month lease would be offered one free monthly Metro pass. This provision would increase the use of established public transit in the area.</p>
<p><b>Policy CI 3.3:</b> Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.</p>	<p><b>No Conflict.</b> The Project would include reconstruction of sidewalks, curbs, and gutters adjoining the Project site. Furthermore, as mentioned above, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169<sup>th</sup> Street and onsite along Brighton Way (west) and 170<sup>th</sup> Street (south) pursuant to the GGP Circulation Element requirements for a Local Street (2 lanes, undivided with parking).</p>
<p><b>Policy CI 3.4:</b> Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA’s regional bicycle system.</p>	<p><b>No Conflict.</b> The Project promotes bicycle usage through provision of bicycle access along street frontages and bicycle parking.</p>
<p><b>Housing Element</b></p>	
<p><b>Goal 3.0:</b> Minimize the impact of governmental constraints on housing construction and cost.</p>	
<p><b>Policy 3.3:</b> Encourage the use of special development zones and other mechanisms to allow more flexibility in housing developments.</p>	<p><b>No Conflict.</b> The Project reduces the impact of governmental constraints on housing construction and cost by implementing special zoning and development standards to permit more flexibility in housing developments in southeast Gardena. The Project offers</p>



General Plan Policy	Project Analysis
	<p>an opportunity to create a vibrant, multi-family neighborhood. The Project facilitates more diverse multi-family housing options to serve the City’s growing and evolving technology industry, and balances job growth with new high-quality housing opportunities. By permitting denser development than would otherwise be permitted under existing zoning, the Project incentivizes construction of new multi-family housing with a variety of unit types thereby reducing costs.</p>
<p><b>Goal 4.0:</b> Provide adequate residential sites through appropriate land use and zoning to accommodate the City’s share of regional housing needs.</p>	
<p><b>Policy 4.1:</b> Implement land use policies that allow for a range of residential densities.</p>	<p><b>No Conflict.</b> Upon adoption of the General Plan Amendment and zone change to Specific Plan, the Project would be consistent with land use designations and zoning to provide for the development of multi-family residential development. The provision of up to 403 residential units near regional serving public transit infrastructure assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in southeast Gardena primarily consists of single-family housing with minimal multi-family housing along arterials. The Project permits a greater range of residential densities than is currently permitted in this area of the City. Additionally, three parcels of the existing Project site are designated with a Housing Overlay which identifies that the site has potential to be redeveloped with residential uses to help the City meet its Regional Housing Needs Allocation.</p>
<p><b>Community Resources Element: Conservation Plan</b></p>	
<p><b>CN Goal 2:</b> Conserve and protect groundwater supply and water resources.</p>	
<p><b>Policy CN 2.2:</b> Comply with the water conservation measures set forth by the California Department of Water Resources.</p>	<p><b>No Conflict.</b> The Project conserves and protects groundwater supply and water resources through compliance with all applicable regulations, including the water conservation measures set forth by the Department of Water Resources. The Project site is approximately 99.7% impervious under existing conditions.<sup>2</sup> The Project would reduce the impermeable area to approximately <del>85.90</del> <u>91.1%</u>, an approximately <del>13.80</del> <u>8.6%</u> reduction by incorporating approximately <del>31,000</del> <u>20,432</u> SF of new planting areas. The Project would be required to comply with all applicable</p>
<p><b>Policy CN 2.6:</b> Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.</p>	

<sup>2</sup> Urban Architecture Lab. (2022). 16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.



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	regulations regarding the disposal of hazardous waste and waste oil during construction.
<b>Goal 3:</b> Reduce the amount of solid waste produced in Gardena.	
<b>Policy CN 3.1:</b> Comply with the requirements set forth in the City’s Source Reduction and Recycling Element.	<b>No Conflict.</b> The Project would comply with all applicable local and state requirements for waste diversion during both construction and operations, including the City’s Source Reduction and Recycling Element.
<b>CN Goal 4:</b> Conserve energy resources through the use of technology and conservation methods.	
<b>Policy CN 4.1:</b> Encourage innovative building designs that conserve and minimize energy consumption.	<b>No Conflict.</b> The Project would be a multi-family development subject to Title 24 requirements. The Project would be designed to achieve best practices for architectural design and land development that enhance the City’s infrastructure, reduce consumption of non-renewable resources, and limit pollutants and greenhouse gas emissions. The Project would comply with the 2022 CALGreen sustainability standards, or those in effect at the time that plans are submitted.
<b>Policy CN 4.2:</b> Require compliance with Title 24 regulations to conserve energy.	
<b>CN Goal 5:</b> Protect the City’s cultural resources.	
<b>Policy CN 5.3:</b> Protect and preserve cultural resources of the Gabrielino Native American Tribes found or uncovered during construction.	<b>No Conflict.</b> The Project would incorporate measures to protect and preserve any cultural resources of the Gabrielino Native American Tribe, or any other Tribe, found or uncovered during construction. See <b>Section 4.14: Tribal Cultural Resources.</b>
<b>Community Safety Element: Public Safety Plan</b>	
<b>PS Goal 1:</b> Maintain a high level of fire and police protection for residents, businesses and visitors.	
<b>Policy PS 1.6:</b> Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.	<b>No Conflict.</b> The City has considered law enforcement, crime prevention, and fire safety concerns in its Project review. The building and parking structure would be accessible only to residents. <u>The five spaces directly off Normandie Avenue will be made available for public parking.</u> The Project proposes 10 guest parking spaces, which would be located near the townhome units. The Project would comply with all applicable Fire Code and fire safety regulations.
<b>PS Goal 2:</b> Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.	
<b>Policy PS 2.3:</b> Require compliance with seismic safety standards in the Uniform Building Code.	<b>No Conflict.</b> The Project would be required to comply with the seismic safety standards in the Uniform Building Code.
<b>Policy PS 2.4:</b> Require geotechnical studies for all new development projects located in an Alquist-Priolo Earthquake Fault Zone or areas subject to liquefaction.	<b>No Conflict.</b> The Project site is near parcels within a liquefaction zone; therefore, a geotechnical study was prepared for the Project area; see <b>Appendix 4.4-1: Preliminary Geotechnical Investigation.</b>





General Plan Policy	Project Analysis
<b>PS Goal 4:</b> Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.	
<b>Policy PS 4.3:</b> Promote professional management of multi-family residential buildings.	<b>No Conflict.</b> The Project’s proposed multi-family residential building would be professionally managed and the property managers would develop standard emergency preparedness plans and procedures.
<b>Community Safety Element: Noise Plan</b>	
<b>N Goal 2:</b> Incorporate noise considerations into land use planning decisions.	
<b>Policy N 2.4:</b> Require mitigation of all significant noise impacts as a condition of project approval.	<b>No Conflict.</b> The Project’s potential for generating noise impacts on the surrounding environment both during construction and operation is addressed in <b>Section 4.9: Noise</b> . As concluded in <b>Section 4.9: Noise</b> , impacts associated with Project onsite construction activities would be significant and unavoidable despite the specified mitigation measures. In accordance with <b>Policy 2.4</b> , mitigation is required to minimize construction noise impacts. As to <b>Policies 2.5</b> and <b>2.6</b> , the Project would conduct interior noise level studies and achieve interior noise level standards as required by the Building Code. As to <b>Policy 2.9</b> , the Project would incorporate design features necessary to control residential interior noise levels and minimize exposure of residents to nearby mobile noise sources in accordance with the Building Code standards for interior noise levels.
<b>Policy N 2.5:</b> Require proposed projects to be reviewed for compatibility with nearby noise-sensitive land uses with the intent of reducing noise impacts.	
<b>Policy N 2.6:</b> Require new residential developments located in proximity to existing commercial/ industrial operations to control residential interior noise levels as a condition of approval and minimize exposure of residents in the site design.	
<b>Policy N 2.9:</b> Encourage the creative use of site and building design techniques as a means to minimize noise impacts.	
<b>N Goal 3:</b> Develop measures to control non-transportation noise impacts.	
<b>Policy N 3.2:</b> Require compliance with noise regulations. Review and update Gardena’s policies and regulations affecting noise.	<b>No Conflict.</b> The Project would be subject to compliance with the City’s noise ordinance.
<b>Policy N 3.3:</b> Require compliance with construction hours to minimize the impacts of construction noise on adjacent land.	<b>No Conflict.</b> The Project would be subject to compliance with the City’s regulations regarding permitted construction hours.
Source: City of Gardena. 2006. <i>Gardena General Plan 2006, Updated 2022</i> . <a href="https://www.cityofgardena.org/general-plan/">https://www.cityofgardena.org/general-plan/</a> . Accessed May 2023.	

DEIR Page 4.8-21

These approvals are needed for Project development, which proposes one seven-story apartment building with 328 apartments and ~~nine~~ ten three-story structures which include 75 townhome style units to replace the warehouse buildings currently on the property.



## DEIR Section 4.9: Noise

DEIR Page 4.9-1

It is noted, the Noise Impact Study was based on an earlier Conceptual Site Plan, which has since been slightly modified (“February 2024 Conceptual Site Plan”). Section 2.3: Project Characteristics describes the proposed Project based on the February 2024 Conceptual Site Plan. A follow-up Project Modified Site Plan – Operational Noise Analysis (“Operational Noise Analysis”) (Acoustical Engineering Services, March 7, 2024) was conducted (see Appendix 4.9-2) to analyze the February 2024 Conceptual Site Plan. The Operational Noise Analysis found the Noise Impact Study’s significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s Noise Impact Study; see **Appendix 4.9-1**.

DEIR Page 4.9-19

-Townhomes: ~~swimming outdoor~~ pool with BBQ and seating areas; dog park; club house; and ~~paseos with seating areas~~ playground.

DEIR Page 4.9-20

Concerning the February 2024 Conceptual Site Plan, the location of the townhomes pool (L1) changed to the eastern portion of the Project site to approximately 430 feet northeast of sensitive receptor R1 and approximately 140 feet west of sensitive receptor R3. Although the outdoor activity noise levels presented in Table 4.9-8 were modelled using the pool’s original location, the noise levels associated with the pool’s modified location would be less or similar to those presented in the table. In its modified location, the pool would move further away from sensitive receptor R1, thus noise levels would be less than 46.6 dBA, resulting in a less than significant impact. In its modified location, the pool would move closer to sensitive receptor R3, however, as shown above in Table 4.9-8, the estimated noise from outdoor activities at receptor R2, which is the receptor nearest the modified pool location, is only 37.7 dBA, which would be far below the significance threshold of 67.3 dBA. The pool’s relocation would not increase outdoor operational noise levels such that the significance threshold would be exceeded. Further, any increase in outdoor activity noise levels at sensitive receptor R3 would be masked by offsite mobile roadway noise along South Normandie Avenue. Thus, the Project’s outdoor stationary noise source noise levels associated with the February 2024 Conceptual Site Plan would remain less than significant.

DEIR Page 4.9-29

Acoustical Engineering Services, Inc. (2024). Project Modified Site Plan – Operational Noise Analysis; see Appendix 4.9-2.



## DEIR Section 4.10: Population and Housing

DEIR Page 4.10-10

The Project proposes to remove all existing onsite structures and, in their place, construct a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northeastern portion; and 75 townhome-style units within ~~nine~~ ten buildings at the Project site's southern portion and along the western site boundary; see **Exhibit 2-4: Conceptual Site Plan. Table 2-45: Land Use Summary – Proposed Apartment Building** summarizes the apartment building's proposed floor areas and various proposed apartment product types (i.e., 68 studio, 194 one-bedroom, and 66 two-bedroom). **Table 2-56: Land Use Summary – Proposed Townhomes** summarizes the townhome proposed floor areas and the various proposed townhome product types (i.e., ~~30 two-bedroom, 35~~ 65 three-bedroom, and 10 four-bedroom).

## DEIR Section 4.12: Recreation

DEIR Page 4.12-6

The Normandie Crossing Specific Plan (Section VI. Landscape and Open Space Plan) specifies that the Project must provide a minimum of ~~16,400~~ 9,850 SF (50 SF per unit for 60 percent of the units) of private open space and ~~22,698~~ 22,140 SF of outdoor common open space for the proposed apartments and 3,750 SF (50 SF per unit) of private space and ~~7,645~~ 8,680 SF of indoor and outdoor common open space for the proposed townhomes.

DEIR Page 4.12-6

Overall, the Project proposes approximately ~~50,493~~ 44,420 SF of open spaces, including approximately ~~20,150~~ 13,600 SF of private open space and approximately ~~30,343~~ 32,820 SF of common open space.

DEIR Page 4.12-6

Each Subarea A unit would be ~~provided~~ provide a minimum of 50 SF of private open space for 60 percent of the units (197 units).

DEIR Page 4.12-6

Each Subarea B unit would be provided 50 SF of private open space (i.e., balconies and ~~roof decks~~ yards). The amenities proposed in Subarea B's public open spaces are as follow: swimming pool with BBQ and seating areas; dog park; club house; and ~~paseos with seating areas~~ a playground.



## DEIR Section 4.13: Transportation

DEIR Page 4.13-1

It is noted, the CEQA Transportation Assessment and Local Transportation Assessment identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified (“February 2024 Conceptual Site Plan”). Section 2.3: Project Characteristics describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the CEQA Transportation Assessment and Local Transportation Assessment significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s CEQA Transportation Impact Assessment and Local Transportation Assessment; see **Appendix 4.13-1** and **Appendix 4.13-2**.

DEIR Page 4.13-16

- Removing approximately 170 linear feet of the spur track, ~~which enters the project site and on UPRR property that formerly serves~~ served the southernmost industrial building (16911 Normandie Avenue);

## DEIR Section 4.15: Utilities and Service Systems

DEIR Page 4.15-1

It is noted, the Water Resources Technical Report and Energy Assessment identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified. However, from the time the reports were completed, the Conceptual Site Plan has not changed concerning Project elements which are foundational to these studies and which would inform Project-relevant data. Section 2.3: Project Characteristics describes the proposed Project elements based on the current February 2024 Conceptual Site Plan. Because the Conceptual Site Plan has not changed concerning Project elements foundational to the Water Resources Technical Report and Energy Assessment, their conclusions remain valid and applicable to the February 2024 Conceptual Site Plan. As such, updates to these studies to reflect the February 2024 Conceptual Site Plan are not warranted. Fuscoe Engineering provided a memorandum on March 7<sup>th</sup>, 2024 confirming that the conclusions from the Water and Wastewater Technical Report dated April 2023 remain valid and applicable to the February 2024 Conceptual Site Plan.

DEIR Page 4.15-25

The Project’s estimated wastewater generation would be approximately ~~86,500~~ 88,000 gpd, or approximately ~~75,890~~ 77,390 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7: Estimated Project Wastewater Generation**.



DEIR Page 4.15-25, Table 4.156-7: Estimated Project Wastewater Generation

**Table 4.15-10: Estimated Project Wastewater Generation**

Land Use	Dwelling Units	Average Generation Factor (gpd/DU) <sup>1</sup>	Total Wastewater Generation (gpd)
Apartments	68 Units – (Studio)	150	10,200
	194 Units – ( 1-BR)	200	38,800
	66 Units – (2-BR)	250	16,500
Townhomes	10 Units – (4-BR)	300	3,000
	<del>35</del> <u>65</u> Units – (3-BR)	300	<del>10,500</del> <u>19,500</u>
	<del>30</del> Units – (2-BR)	250	7,500
<b>Total Project</b>			<del>86,500</del> <b><u>88,000</u></b>
<b>Total Existing<sup>2</sup></b>			<b>-10,610</b>
<b>Net Project</b>			<b><del>+75,890</del> <u>+77,390</u> (0.08 mgd)</b>
Note: <sup>1</sup> Based on the sewer generation factors from the “Estimated Average Daily Sewage Flows for Various Occupancies” document from LA County Public Works. <sup>2</sup> See Table 4.15-4.			
Source: Appendix 4.7-1, Table 4.			

DEIR Page 4.15-29

The Project’s estimated water demand would total approximately ~~158,211~~ 159,266 gpd, or approximately ~~145,479~~ 146,534 gpd over existing conditions; see Table 4.15-9: Estimated Project Water Demand.



DEIR Page 4.15-30, Table 4.15-9: Estimated Project Water Demand

**Table 4.15-11: Estimated Project Water Demand**

Land Use	Units	Average Demand Factor (gpd/DU) <sup>1</sup>	Total Water Demand (gpd)
Apartments	68 Units – (Studio)	180	12,240
	194 Units – ( 1-BR)	240	46,560
	66 Units – (2-BR)	300	19,800
Townhomes	10 Units – (4-BR)	360	3,600
	<del>35</del> <u>65</u> Units – (3-BR)	360	<del>12,600</del> <u>23,400</u>
	<del>30</del> Units – (2 BR)	300	9,000
Pool(s) <sup>2</sup>	1 Unit @ - L1 Courtyard	13,614	13,614
	1 Units @ - L1 Courtyard	2,693	2,693
	1 Unit @ - L3 Courtyard	35,904	35,904
Landscaping	<del>30,891</del> <u>20,432</u> SF	ETWU Method <sup>3, 4</sup>	<del>2,200</del> <u>1,455</u>
<b>Total Project</b>			<del>158,211</del> <u>159,266</u> <del>(177.2</del> <u>178.4</u> AFY)
<b>Total Existing<sup>5</sup></b>			<b>-12,732</b>
<b>Net Project</b>			<del>+145,479</del> <u>+146,534</u> <del>(+163</del> <u>+164.1</u> AFY)
<p>Note:</p> <p><sup>1</sup> Based on 120% of the sewer generation factors from the “Estimated Average Daily Sewage Flows for Various Occupancies” document from LA County Public Works. See Golden State Water Company 2020 Urban Water Management Plan Southwest Service Area, page 1-2.</p> <p><sup>2</sup> Pools vary in size; therefore, pools have different water consumption values per unit.</p> <p><sup>3</sup> Demand based on Estimated Total Water Use equation: (Eto*plant factor*landscaped area* 0.62)/irrigation efficiency. Utilizing CIMIS Reference Evapotranspiration Zones Map ET of 46.6 in/yr, and a conservative plant factor of 0.7 and irrigation efficiency of 0.81 proposed condition.</p> <p><sup>4</sup> The Project’s proposed landscaping was updated to total 30,205 SF (See <b>Section 3.0: Project Description</b>) after completion of this analysis. Because the Project’s updated landscaping would generate less water demand, this analysis conservatively assumes 30,891 SF of proposed landscaping for purposes of determining water demand.</p> <p><sup>5</sup> See <b>Table 4.15-1</b>.</p>			
Source: <b>Appendix 4.15</b> , Table 3.			

DEIR Page 4.15-31

The Project’s increase in water demand of ~~145,479~~ 146,534 gpd (~~163~~ 164.1 AFY) represents approximately 6.5% of the UWMP’s forecast increase in demand between 2025 and 2045.



*DEIR Page 4.15-31*

As discussed above, the Project’s estimated wastewater generation would be approximately ~~86,500~~ 88,000 gpd, or approximately ~~75,890~~ 77,390 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7**.

*DEIR Page 4.15-31*

The Project’s estimated wastewater generation of ~~75,890~~ 77,390 gpd (~~0.076~~ 0.08 mgd) comprises less than 0.06 percent of JWPCP’s remaining available capacity of 156.9 mgd.

**DEIR Section 4.16: Aesthetics**

*DEIR Page 4.16-10*

- At 16964 ~~West 179<sup>th</sup> Street~~ Brighton Avenue, rezone from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone;

**DEIR Section 5.0: Other CEQA Considerations**

*DEIR Page 5-3*

The Project would remove all onsite uses to develop a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site’s northern portion; and 75 townhome-style units within ~~nine~~ ten buildings at the Project site’s southern portion and along the western site boundary.

**DEIR Section 6.0: Alternatives To The Proposed Project**

*DEIR Page 6-2*

The Project proposes a 403-dwelling unit (DU) multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site’s northern portion; and 75 townhome-style units within ~~nine~~ ten buildings at the Project site’s southern portion and along the western site boundary.

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The analysis presented below compares the potential environmental impacts associated with the following alternatives to impacts from the proposed Project:

- “No Project/No Construction” Alternative;
- “No Project/Existing Land Use Designation” Alternative;
- “Reduced Density” Alternative; and
- “Community Input” Alternative.



Throughout the following analysis, the alternatives’ impacts are analyzed for each environmental issue area, as examined in **Sections 4.1: Air Quality** through **4.16: Aesthetics**. In this manner, each Alternative can be compared to the Project on an issue-by-issue basis. ~~Table 6-3: Comparison of Alternatives~~ **Table 6-12: Comparison of Alternatives**, included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each Alternative’s impacts in relation to the Project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible. **Section 6.6: Environmentally Superior Alternative**, references the “environmentally superior” Alternative, as required by the State CEQA Guidelines.

*DEIR Page 6-16, Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative*

**Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative**

Description	Apartment Building (DU) <sup>1</sup>	Townhomes (DU) <sup>1</sup>	Density (DU/AC) <sup>1</sup>	Floor Area (SF) <sup>1</sup>
Proposed Project	328	75	77	<del>429,000</del> <u>429,578</u> (Residential)
No Project/Existing Land Use Designation Alternative				200,310 <u>228,690</u> (Industrial)
<i>Difference</i>	-328	-75		-200,888
<i>% Difference</i>	-100%	-100%		<del>-47%</del> <u>-53%</u>
Note: 1. DU = dwelling units; AC = acre; SF = square feet.				

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The Project proposes an apartment building approximately 90 feet tall and ~~nine~~ ten townhome buildings approximately 40 feet tall, as measured from the finished floor (i.e., the level of the finished floor on the ground level) of the roof’s highest point.





DEIR Page 6-25, **Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative**

**Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative**

Description	Apartment Building (DU) <sup>1</sup>	Townhomes (DU) <sup>1</sup>	Density (DU/AC)	Height of Building (Stories)	Floor Area (SF)
Proposed Project	328	75	77	7	429,000 <u>429,578</u>
Reduced Density Alternative	192	75	51	5	253,110
<i>Subtotal Difference</i>	-136	-0			
<i>Total Difference</i>	-136			-2	<del>-175,890</del> <u>-176,468</u>
<i>% Difference</i>	-34%				-41%

Note: DU = dwelling units; and AC = acre.

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The Reduced Density Alternative proposes approximately 34 percent fewer DU than the Project and less floor area (approximately 253,110 SF compared to approximately 429,000 429,578 SF), thus, proportionately fewer construction emissions as presented in **Table 4.1-5** would occur.

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6.4.5 COMMUNITY INPUT” ALTERNATIVE

The Community Input Alternative was added as a result of input received from the community through the public hearing and public review processes, as well as from a follow-up meeting the Applicant had with neighborhood residents following the March 19, 2024 Planning Commission meeting. This new Alternative addresses the following primary concerns that were raised by the community and neighborhood residents: density; and apartment building height and mass, parking, and the alignment of the driveway on 170<sup>th</sup> Street.

DESCRIPTION OF ALTERNATIVE

The Community Input Alternative assumes development of the Project site similar to the proposed Project. The townhomes would remain unchanged; however, under this Alternative, the apartment building would be reduced to 258 DUs (from 328 DU) and the building height would be reduced to five above grade stories at a maximum height of 70 feet from existing grade (from seven above grade stories at a maximum height of 90 feet from existing grade) and would include one level of subterranean parking (with none under the proposed Project). This Alternative proposes a total of 333 DU, or approximately 17 percent fewer DU than the Project’s



proposed 403 DU and would reduce the density to 63 DU/AC (from 77 DU/AC). With fewer units, this Alternative would include fewer affordable units (7 affordable DU rather than 20 affordable DU). **Table 6-3: Comparison Between Proposed Project and Community Input Alternative** compares development under the Project and the Community Input Alternative.

**Table 6-3: Comparison Between Proposed Project and Community Input Alternative**

Description	Apartment Building (DU) <sup>1</sup>			Townhomes (DU) <sup>1</sup>	Total DU	Density (DU/AC)	Height of Apartment Building		Floor Area (SF)
	Market Rate	Affordable	Subtotal				Above Grade Stories	Below Grade Stories	
Proposed Project	308	20	328	75	403	77	7	0	429,000
Community Input Alternative	251	7	258	75	333	63	5	1	367,000
Subtotal Difference	-57	-13	-70	0		=	-2	+1	=
Total DU Difference	-70					=	-1		-62,000
% Difference	-17%					=	=		-14%

**Note:**

1. DU = dwelling units, SF=square feet, and AC = acre.

**Table 6-4: Community Input Alternative Parking** compares parking under the Project and parking under the Community Input Alternative. Under this Alternative, onsite vehicle parking would be reduced to 556 spaces (from 559 spaces) and bicycle parking would be reduced to 69 spaces (from 173 spaces). However, given this Alternative would include 70 fewer DU, the parking spaces per DU ratio would increase to 1.67 spaces per DU (from 1.39 spaces per DU).

**Table 6-4: Community Input Alternative Parking**

Description	Total DU <sup>1</sup>	Total Parking Spaces <sup>2</sup>			Parking Spaces per DU Ratio		
		Apartment Building	Townhomes	Total	Apartment Building	Townhomes	Total
Proposed Project	403	399	150 + 10 guest parking	559	1.22	2.13	1.39
Community Input Alternative	333	387	150 + 19 guest parking	556	1.5	2.25	1.67
Total Difference	-70	-12	+9	-3	0.28	0.12	+0.28
% Difference	-17%	-3%	+6%	-1%	23%	6%	+20%

**Note:**

1. DU = dwelling units

2. Total parking spaces includes electric vehicle charging, accessible, guest, and standard parking spaces.

Except the townhome's 170<sup>th</sup> Street access driveway, it is assumed all access driveways under this Alternative would be the same as the Project, thus, this Alternative would similarly require offsite railroad improvements pursuant to CPUC standards and UPRR guidelines. Under this Alternative, the townhome's 170<sup>th</sup> Street access driveway would be relocated west to align with the Brighton Avenue at West 170<sup>th</sup> Street intersection. Under the Community Input Alternative,



more grading would be required for the proposed subterranean parking (approximately 40,730 cubic yards of cut and export with a maximum depth of excavation to 15.0 feet below ground surface [bgs]) rather than approximately 10,000 cubic yards of cut and export with a maximum depth of excavation to 6.0 feet bgs). Additionally, because construction hauling trips are determined based on project-specific grading material movement, under the Community Input Alternative, more construction hauling trips would occur (approximately 2,546 construction hauling trips rather than 625 construction hauling trips).<sup>3</sup> Similar to the Project, construction under this Alternative would occur over approximately 3.5 years.

As discussed more fully below, all impacts of the Community Input Alternative except for construction noise, including those associated with the subterranean parking structure, dirt export, and hauling, are found to be less than significant similar to the original project.

## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **Air Quality**

**Table 4.1-5: Construction Air Pollutant Emissions** provides the Project's construction-related maximum daily criteria air pollutant (CAP) emissions using the CARB-approved CalEEMod Version 2020.4 computer program, which was the most recent version when the Project's Notice of Preparation (NOP) was released in 2021. **Table 4.1-5** shows the Project's construction-related maximum daily CAP emissions would be below the SCAQMD's mass daily significance thresholds, resulting in a less than significant impact.

The Community Input Alternative's construction-related emissions were calculated using CalEEMod Version 2022.1, which is the most current version of the computer program. To compare the Community Input Alternative's construction-related criteria air pollutant emissions and the proposed Project's emissions using the same computer model, the Project's construction-related emissions were also calculated using CalEEMod Version 2022.1 for informational purposes only; see **Appendix 6.0-1: Air Quality, Greenhouse Gas, and Noise Modeling Data** for proposed Project and Community Input Alternative construction assumptions and CalEEMod Version 2022.1 outputs.<sup>4</sup>

**Table 6-5: Community Input Alternative Construction Air Pollutant Emissions** provides the construction-related maximum daily criteria air pollutants emissions for the proposed Project and the Community Input Alternative using CalEEMod Version 2022.1. **Table 6-5** shows the Community Input Alternative's construction-related maximum daily criteria air pollutant emissions and shows they would be greater than the proposed Project for VOC, less than the proposed Project for NO<sub>x</sub> and CO, and the same as the proposed Project for SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. While the Community Input Alternative would result in greater regional emissions for one pollutant, like the proposed Project, this Alternative's construction-related maximum daily

<sup>3</sup> California Air Pollution Control Officers Association (CAPCOA). *CalEEMod User Guide, Appendix C Emission Calculation Details for CalEEMod, Section 4.6.1 Default Values for Vehicle Trip Rate Pg. C-19*. Retrieved from: [https://www.caleemod.com/documents/user-guide/04\\_Appendix%20C.pdf](https://www.caleemod.com/documents/user-guide/04_Appendix%20C.pdf). Accessed October 23, 2024.



emissions would be below the SCAQMD significance thresholds and impacts would be less than significant.

**Table 6-5: Community Input Alternative Construction Air Pollutant Emissions**

<u>Year</u>	<u>Maximum Daily Criteria Air Pollutant Emissions<sup>1,2,3</sup></u> <u>(lb/day)</u>					
	<u>VOC<sup>4</sup></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>SO<sub>x</sub></u>	<u>PM<sub>10</sub><sup>5</sup></u>	<u>PM<sub>2.5</sub><sup>5</sup></u>
<u>2025</u>	<u>0.51</u>	<u>5.57</u>	<u>25.34</u>	<u>0.05</u>	<u>8.05</u>	<u>4.07</u>
<u>2026</u>	<u>1.32</u>	<u>5.46</u>	<u>28.49</u>	<u>0.05</u>	<u>3.34</u>	<u>1.62</u>
<u>2027</u>	<u>1.16</u>	<u>3.83</u>	<u>21.86</u>	<u>0.02</u>	<u>3.01</u>	<u>0.75</u>
<u>2028</u>	<u>30.10</u>	<u>0.98</u>	<u>5.70</u>	<u>0.00</u>	<u>1.05</u>	<u>0.25</u>
<b><u>Community Input Alternative Maximum<sup>6</sup></u></b>	<b><u>30</u></b>	<b><u>6</u></b>	<b><u>28</u></b>	<b><u>&lt;1</u></b>	<b><u>8</u></b>	<b><u>4</u></b>
<b><u>Proposed Project Maximum</u></b>	<b><u>12</u></b>	<b><u>9</u></b>	<b><u>48</u></b>	<b><u>&lt;1</u></b>	<b><u>8</u></b>	<b><u>4</u></b>
<b><u>SCAQMD Significance Threshold<sup>8</sup></u></b>	<b><u>75</u></b>	<b><u>100</u></b>	<b><u>550</u></b>	<b><u>150</u></b>	<b><u>150</u></b>	<b><u>55</u></b>
<b><u>Exceed Threshold?</u></b>	<b><u>No</u></b>	<b><u>No</u></b>	<b><u>No</u></b>	<b><u>No</u></b>	<b><u>No</u></b>	<b><u>No</u></b>

1. Numbers are rounded for reporting purposes. The sum of the emissions may not add up due to rounding.  
 2. Emissions shown here are based on the specific construction schedule and hauling material for the Alternative and the Project. Emissions were estimated using CalEEMod Version 2022.1. CalEEMod defaults were used for on-site construction equipment mix and on-road vehicle trips. See Appendix 6.0-1 for detailed CalEEMod outputs for the Alternative and the Project. Analysis assumes on-site fugitive dust control [watering three times daily during construction].  
 3. Alternative and Project construction assume the use of USEPA Tier 4 for construction equipment greater than 50 hp.  
 4. For purposes of this analysis, VOC emissions are assumed to be equal to ROG emissions.  
 5. PM emissions are estimated as a sum of exhaust, tire wear, brake wear, and fugitive dust emissions. PM fugitive dust emissions during construction include a 55% reduction (for watering at least two times daily to comply with SCAQMD Rule 403).  
 6. SCAQMD Air Quality Significance Thresholds. Available at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.  
 CalEEMod = California Emissions Estimator Model; CO = carbon monoxide; lb = pounds; NO<sub>x</sub> = nitrogen oxides; PM = particulate matter; PM<sub>10</sub> = particulate matter less than 10 microns in diameter; PM<sub>2.5</sub> = particulate matter less than 2.5 microns in diameter; ROG = reactive organic gases; SCAQMD = South Coast Air Quality Management District; SO<sub>x</sub> = oxides of sulfur; VOC = volatile organic compounds

Source: Kimey-Horn and Associates, Inc. (2024). See Appendix 6.0-1.

**Table 4.1-7: Localized Significance of Construction Emissions** provides the Project’s maximum daily on-site construction-related criteria air pollutant emissions using the CalEEMod Version 2020.4, which was the most recent version when the Projects NOP was released in June 2021. Table 4.1-7 shows that the Project’s maximum daily on-site construction related criteria air pollutant emissions would be less than the SCAQMD mass-rate LSTs for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Project’s contribution to the localized air concentrations of these pollutants would be less than significant.

The Community Input Alternative’s maximum daily on-site construction-related criteria air pollutant emissions were calculated using CalEEMod Version 2022.1. To compare the Community



Input Alternative’s maximum daily on-site construction related criteria air pollutant emissions and the proposed Project’s emissions using the same computer model, the Project’s maximum daily on-site construction related criteria air pollutant emissions were also calculated using CalEEMod Version 2022.1 for informational purposes only; see Appendix 6.0-1 for proposed Project and Community Input Alternative construction assumptions and CalEEMod Version 2022.1 outputs.

Table 6-6: Community Input Alternative Localized Significance of Construction Emissions (Maximum Pounds Per Day) provides the maximum daily on-site construction-related criteria air pollutant emissions for the proposed Project and the Community Input Alternative using CalEEMod Version 2022.1. Table 6-6 shows that would be greater than the proposed Project for PM<sub>10</sub> and PM<sub>2.5</sub> and less than the proposed Project for CO, NO<sub>x</sub> and 1-hour NO<sub>x</sub>. While the Community Input Alternative would result in greater maximum daily on-site construction-related emissions for two pollutants, like the proposed Project, this Alternative’s maximum daily on-site construction-related emissions would not exceed the SCAQMD mass-rate LSTs and impacts would be less than significant. Like the Project, the Alternative’s contribution to the localized air concentrations of these pollutants would also be less than significant.

**Table 6-6: Community Input Alternative Localized Significance of Construction Emissions (Maximum Pounds Per Day)**

<u>Emission Type</u>	<u>Maximum Daily On-Site Construction Emissions (lb/day)<sup>1</sup></u>				
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>1-Hour NO<sub>x</sub><sup>2</sup></u>	<u>PM<sub>10</sub><sup>3</sup></u>	<u>PM<sub>2.5</sub><sup>3</sup></u>
<u>Community Input Alternative Maximum</u>	<u>24.3</u>	<u>2.6</u>	<u>2.6</u>	<u>8.0</u>	<u>4.1</u>
<u>Proposed Project Maximum</u>	<u>28.31</u>	<u>4.5</u>	<u>4.5</u>	<u>7.7</u>	<u>3.9</u>
<u>SCAQMD Localized Significance Thresholds<sup>4</sup></u>	<u>1,796</u>	<u>197</u>	<u>109</u>	<u>15</u>	<u>8</u>
<u>Exceed Threshold?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

1. Emissions represent the change in on-site emissions due to the proposed land uses relative to emissions from the existing conditions. Emissions were estimated using CalEEMod Version 2022.1.

2. An approximated LST was estimated to evaluate the federal 1-hour NO<sub>2</sub> standard for the Project and Alternative, as the SCAQMD LST has not been updated to reflect this standard. This value was estimated by scaling the SCAQMD LST that represents the state 1-hr NO<sub>2</sub> standard with the ratio of the federal to state 1-hr NO<sub>2</sub> standard (0.10 ppm/0.18 ppm).

3. PM fugitive dust emissions for the Project and Alternatives during unmitigated construction include a 55% reduction (for watering at least two times daily to comply with South Coast AQMD Rule 403).

4. LSTs based on a 5-acre Project site SRA 3 (Southwest Coastal LA County) for a 25-m receptor distance. LSTs were obtained from the 2008 SCAQMD Final Localized Significance Threshold Methodology, Appendix C, Mass Rate LST Look-up Tables. Available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/localized-significance-thresholds>.

CalEEMod® - California Emissions Estimator Model; CO - carbon monoxide; lb – pounds; LST - Localized Significance Threshold; NO<sub>2</sub> - nitrogen dioxide; NO<sub>x</sub> - nitrogen oxides; PM<sub>10</sub> - coarse particulate matter; PM<sub>2.5</sub> - fine particulate matter; South Coast AQMD - South Coast Air Quality Management District

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1**.

As shown in Table 4.1-6, the Project’s operational criteria pollutant emissions would be below the SCAQMD’s mass daily significance thresholds and would result in a less than significant air



quality impact. The Community Input Alternative would result in less operational emissions than the Project given it proposes 17 percent fewer DUs and 14 percent less floor area. Therefore, the Community Input Alternative's contribution to the localized air concentrations of these pollutants would be less than significant during operations.

The Community Input Alternative would result in less impacts than the proposed Project regarding air quality. The Community Input Alternative, like the proposed Project, would result in less than significant construction-related emissions. Because the Community Input Alternative would include fewer DU, long-term operational emissions associated with vehicle trips, energy usage, and areas sources would be less than the proposed Project.

### Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated. The Community Input Alternative would involve demolition and ground disturbing construction activities similar to the Project, but increased depth of excavation for the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering as yet undiscovered archaeological resources, incorporation of similar mitigation would sufficiently avoid or mitigate potential impacts to as yet undiscovered archaeological resources. Therefore, like the Project, this Alternative would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5, and a less than significant impact would occur.

The Project's potential to disturb as yet undiscovered human remains was concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated. The Community Input Alternative would involve demolition and ground disturbing construction activities similar to the Project, but increased depth of excavation due to the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering undiscovered human remains, compliance with the established regulatory framework would reduce impacts to less than significant in the event human remains are encountered. The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated.

The Community Input Alternative would result in similar impacts as the proposed Project regarding cultural resources with mitigation incorporated.

### Energy

As shown in **Table 4.3-5: Project and Countywide Energy Consumption**, the Project would result in construction-related energy consumption from diesel fuel, and gasoline usage. However, the Project would result in less than significant impacts concerning construction-related energy consumption since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements.



The Community Input Alternative’s construction-related energy consumption is identified in **Table 6-7: Community Input Alternative Construction Energy Consumption**. As shown in **Table 6-7**, under the Community Input Alternative there would be less construction-related diesel and gas consumption. Additionally, this Alternative would also be subject to compliance with Title 24 requirements. Like the Project, the Community Input Alternative’s construction activities would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact.

**Table 6-7: Community Input Alternative Construction Energy Consumption**

<u>Energy Type</u>	<u>Community Input Alternative Annual Energy Consumption (gallons)</u>	<u>Los Angeles County Annual Energy Consumption<sup>1,2</sup> (gallons)</u>	<u>Alternative Percentage of Countywide Consumption</u>	<u>Proposed Project Annual Energy Consumption (gallons)<sup>4</sup></u>	<u>Proposed Project Percentage of Countywide Consumption</u>
<u>Diesel<sup>3</sup></u>	<u>155,127</u>	<u>507,214,212</u>	<u>0.0306%</u>	<u>160,224</u>	<u>0.0316%</u>
<u>Gasoline<sup>3</sup></u>	<u>81,486</u>	<u>3,816,162,983</u>	<u>0.0021%</u>	<u>121,444</u>	<u>0.0032%</u>

Notes:

- The Alternative’s and Project increases in electricity and natural gas consumption are compared with the total consumption in Los Angeles County in 2021.
- The Alternative’s and Project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2021.
- Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.
- The proposed Project’s annual energy consumption in Table 4.3-5 was calculated using input from CalEEMod Version 2020.4, which was the most recent version when the Project’s NOP was released in 2021. The Community Input Alternatives construction related energy consumption were calculated using inputs from CalEEMod Version 2022.1, which is the most current Version. To compare the Community Input Alternative’s construction energy and the Project’s construction energy, the Project’s construction energy was also calculated using inputs from CalEEMod Version 2022.1 for informational purposes only.

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1**.

The Project’s operational energy consumption would occur from building energy use, water use, and transportation-related fuel use; see **Table 4.3-5**. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the Community Input Alternative, operational energy consumption would be proportionately less than the Project, as approximately 17 percent fewer DU would operate under this Alternative. Like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations, resulting in a less than significant impact concerning energy.

The Community Input Alternative would result in less impacts than the proposed Project regarding energy. The Community Input Alternative would result in similar construction-related energy consumption but less operational-related energy consumption. Like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in less than significant impacts concerning energy.



## Geology, Soils, and Paleontological Resources

Grading and earthwork activities during Project construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with the GMC erosion and siltation control measures and the Construction General Permit. Following compliance with the established regulatory framework (i.e., the GMC and Construction General Permit), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant. Under the Community Input Alternative, more grading and increased depth of excavation as compared to the proposed Project would be required for the proposed subterranean parking. However, like the proposed Project, following compliance with the established regulatory framework, this Alternative's potential impacts concerning soil erosion and loss of topsoil would be less than significant.

Under the Community Input Alternative, more grading and increased depth of excavation as compared to the proposed Project would be required for the proposed subterranean parking. Therefore, a Preliminary Geotechnical Report was prepared to evaluate potential impacts under this Alternative; see **Appendix 6.0-2: Preliminary Geotechnical Report**. The Geotechnical Report concluded that within incorporation of standard recommendations, this Alternative would not be subject to strong seismic ground shaking, seismic-related ground failure, including liquefaction, landslides, or unstable geologic units or soils. Like the Project, this Alternative would be subject to compliance with standard engineering practices, CBSC regulations, and the Geotechnical Investigation's recommendations for design and construction, which would be verified by the Gardena Building Services Division in accordance with Gardena Municipal Code section 18.42.200.A. Therefore, like the proposed Project, this Alternative would result in less than significant impacts concerning geology and soils.

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. The Community Input Alternative would involve demolition and ground disturbing construction activities similar to the Project, but with an increased depth of excavation due to the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering as yet undiscovered paleontological resources, compliance with the COA and incorporation of MM would reduce impacts to less than significant in the event paleontological resources are encountered.

The Community Input Alternative would result in similar impacts as the proposed Project regarding geology, soils, and paleontological resources.

## Greenhouse Gas Emissions

**Table 4.5-3: Summary of Operational GHG Emissions** provides the Project's amortized construction emissions and operational maximum opening year GHG emissions using the CalEEMod Version 2020.4 computer program, which was the most recent version when the Project's NOP was released in 2021. **Table 4.5-3** shows Project emissions would not exceed SCAQMD's bright line, unadopted screening-level threshold.





The Community Input Alternative’s construction GHG emissions were calculated for each year of construction activity using CalEEMod computer program Version 2022.1, which is the most current version of the computer program. To compare the Community Input Alternative construction GHG emissions and the proposed Projects emissions using the same computer model, the Project’s construction related GHG emissions were also calculated using CalEEMod Version 2022.1 for informational purposes only;; see **Appendix 6.0-1** for proposed Project and Community Input Alternative construction assumptions and CalEEMod Version 2022.1 outputs.

**Table 6-8: Community Input Alternative’s Summary of Construction GHG Emissions** provides the construction-related GHG emissions for the proposed Project and the Community Input Alternative using CalEEMod Version 2022.1. As shown in **Table 6-8**, the Community Input Alternative’s construction related GHG emissions would be greater than the proposed Project for on-road hauling trips, and less than the proposed Project for on-road worker and vendor trips, off-road emissions, and total construction-related GHG emissions. While the Community Input Alternative would result in greater GHG emissions for hauler trips, overall construction GHG emissions and the Alternative’s amortized GHG emissions are lower than the proposed Project.

**Table 6-8: Community Input Alternative’s Summary of Construction GHG Emissions**

Calendar Year	Total Off-Road Emissions	Total On-Road Emissions			Total Construction Emissions <sup>1</sup>
		Worker	Vendor	Hauling	
(MT CO2e)					
2025	525.60	16.31	=	187.80	730.32
2026	322.60	352.81	186.20	23.70	885.30
2027	171.98	297.62	157.0	=	626.01
2028	8.97	48.71	=	=	57.65
<b><i>Community Input Alternative Total</i></b>	<b><i>1,029.15</i></b>	<b><i>715.45</i></b>	<b><i>343.20</i></b>	<b><i>211.50</i></b>	<b><i>2,299.29</i></b>
<b><i>Proposed Project Total</i></b>	<b><i>1,076.3</i></b>	<b><i>1,066.3</i></b>	<b><i>474.1</i></b>	<b><i>86.6</i></b>	<b><i>2,703.19</i></b>
<b><i>Community Input Alternative 30-year Amortized</i></b>					<b><i>77</i></b>
<b><i>Proposed Project 30-year Amortized</i></b>					<b><i>90</i></b>
1. Construction emissions for the Community Input Alternative and the Project include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod Version 2022.1. CO2e includes CO2, CH4, and N2O emissions, weighted by their respective global warming potentials. CH4 = methane; CO2 = carbon dioxide; CO2e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N2O = nitrous oxide; yr = year					
Source: Kimley-Horn and Associates Inc. (2024). See <b>Appendix 6.0-1</b> .					

The Community Input Alternative would result in proportionately less operational GHG emissions than the proposed Project, as approximately 17 percent fewer DU would operate under this Alternative.

The Community Input Alternative would result in less impacts than the proposed Project regarding greenhouse gasses. The Community Input Alternative would result in similar



construction GHG emissions and less operational GHG emissions than the proposed Project. Like the Project, GHG emissions would not exceed significance thresholds, thus would be less than significant under this Alternative.

### Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant.

Like the Project, the Community Input Alternative construction would require demolition of onsite buildings, which could expose construction workers to concentrations exceeding federal and state thresholds. Also like the Project, construction activities under this Alternative could 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. Additionally, the Community Input Alternative would involve more grading and increased depth of excavation (15.0 feet bgs). Because the historical high groundwater level in the area is 15.0 feet bgs and groundwater was encountered during exploration with samples taken up to 22.0 ft bgs, groundwater could be encountered and exposed to construction-related hazardous materials release. However, like the Project, construction activities under this Alternative would be subject to applicable rules and regulations under NPDES General Construction Permit regulations and GMC standards. Further, like the Project, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for this Alternative's construction activities to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment release contaminants into environment (i.e., groundwater). Like the Project, impacts would be less than significant with COA and mitigation (i.e., COA HAZ-1 and COA HAZ-2, and MM HAZ-1) incorporated.

The Phase II Investigation identified PCE and VOC concentrations that exceed DTSC screening levels for residential applications and recommended conducting a VIRE to determine a possible vapor intrusion threat to future residents on the Project site. The VIRE determined the cancer risk estimated to result from unmitigated vapor intrusion was below the DTSC thresholds at the apartment building, but above the thresholds at the townhomes. Therefore, the VIRE recommended that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any townhome and that the apartment building parking structure include sufficient ventilation to minimize accumulation of VOCs. With incorporation of COA HAZ-1, COA HAZ-2, MM HAZ-1 and MM HAZ-2, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving soil and groundwater contamination.



Under the Community Input Alternative, more grading and increased depth of excavation as compared to the proposed Project would be required for the proposed subterranean parking. Therefore, a VIRE was prepared to evaluate potential impacts under this Alternative; see **Appendix 6.0-3: VIRE**. The VIRE concluded estimated cancer risks under this Alternative would be below the DTSC thresholds with mitigation(i.e., MM HAZ-2). Therefore, like the Project, with mitigation incorporated, impacts would be less than significant.

Like the Project, this Alternative would require offsite railroad improvements pursuant to CPUC to minimize potential impacts from derailments. Therefore, compliance with CPUC standards and UPRR guidelines would bring the crossing up to current CPUC standards and UPRR guidelines, thus, a less than significant impact would occur.

The Community Input Alternative would result in similar impacts as the proposed Project regarding hazards and hazardous materials.

### Hydrology and Water Quality

Like the Project, this Alternative's construction activities would require compliance with NPDES and GMC requirements, which include implementation of construction water quality BMPs. This Alternative would involve more grading and increased depth of excavation than the Project, but water quality BMPs and compliance with NPDES and GMC requirements would prevent this Alternative's construction activities from violating any water quality standards or waste discharge requirements or otherwise substantially degrading surface or ground water quality, and a less than significant impact would occur.

Following compliance with NPDES and GMC requirements, which include implementation of operational water quality BMPs, the Project's operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, thereby resulting in less than significant impact. Under this Alternative, approximately 17 percent fewer DU would be built. As such, this Alternative is assumed to result in similar operational impacts as the Project, although to a lesser degree than the Project. Therefore, like the Project, impacts under this Alternative would be less than significant.

The Project would result in an overall decrease in impervious surface coverage from existing conditions and increase in infiltration of stormwater runoff, which would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not impede or redirect flood flows, and would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems, since no net increase of flows would be expected. Like the Project, this Alternative would also decrease the site's impervious surface coverage and increase in infiltration of stormwater runoff, as this Alternative proposes a similar development footprint and impervious surfaces. Therefore, like the Project, this Alternative would decrease peak flow rates and would not impede or redirect flood flows, result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater



drainage systems, since no net increase of flows would be expected. Like the Project, a less than significant impact would occur under this Alternative.

The historical high groundwater level in the area is 15.0 feet bgs and groundwater was encountered during exploration with samples taken up to 22.0 ft bgs; see **Appendix 4.4-1: Preliminary Geotechnical Investigation**. Although the Project would require excavation of existing soils, excavation depth would be at a higher elevation (6.0 feet bgs) than the historical high groundwater level elevation in the area, therefore, Project construction activities are not expected to encounter groundwater. If perched groundwater were encountered during excavation, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under NPDES General Construction Permit regulations and City grading permit conditions. As a result, potential Project construction-related groundwater impacts would be less than significant.

Under the Community Input Alternative, construction would involve more grading and increased depth of excavation (15.0 feet bgs). As concluded in **Appendix 6.0-2: Preliminary Geotechnical Investigation**, the historical high groundwater level in the area is 15.0 feet bgs and groundwater was encountered during exploration with samples taken up to 22.0 ft bgs. Therefore, groundwater could be encountered, and temporary dewatering operations could be required under this Alternative. Dewatering operations would discharge water in accordance with all applicable rules and regulations under NPDES General Construction Permit regulations and GMC Standards. Compliance with NPDES General Construction Permit and GMC standards would reduce impacts to less than significant. Therefore, like the Project, construction under this Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

The Project's proposed structures would be constructed above the historical high groundwater level elevation in the area, and permanent dewatering operations are not anticipated to be required. Under the Community Input Alternative, the apartment's proposed subterranean parking would be constructed at 12 feet bgs near the historical high groundwater level elevation in the area. Therefore, **Appendix 6.0-2** recommends basement waterproofing to be incorporated into this Alternative's final design. Basement waterproofing could involve application of sealants on foundation walls to prevent infiltration, interior drainage systems to remove infiltration, or other methods to minimize groundwater infiltration in the subterranean parking area. Like the Project, the Gardena Building Services Division would review this Alternative's plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's (**Appendix 6.0-2**) recommendations for design including which basement waterproofing method should be incorporated into the Alternative's final design. The basement waterproofing method determined for the Alternative would have a nominal impact on groundwater levels in the area. Further, the Project site is not located within a groundwater recharge basin. Therefore, through compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's (**Appendix 6.0-2**) recommendations for design, which are required to be imposed in accordance with Gardena Municipal Code Section



18.42.200.A, this Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and a less than significant impact would occur.

The Project would rely on GSWC for water service. GSWC's water sources include imported water, groundwater wells from the Southwest System, and recycled water. GSWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The water demand, including groundwater, under this Alternative would be proportionately less than the Project, as approximately 17 percent fewer DU would be developed under this Alternative. Therefore, like the Project, GSWC would have sufficient water supplies available to serve this Alternative and reasonably foreseeable future development during normal, dry, and multiple dry years.

The Project proposes to increase the Project site's pervious surfaces, which would improve the Project site's stormwater percolation/groundwater recharge capacity over existing conditions. Further, the Project would include low impact development (LID) best management practices (BMPs) to increase infiltration of stormwater runoff. Therefore, the Project would not interfere with groundwater recharge and impacts would be less than significant. Like the Project, the Community Input Alternative would result in an overall increase in pervious surface which would improve the site's stormwater percolation/groundwater recharge capacity over existing conditions. This Alternative would also include LID BMPs, which would further increase infiltration of stormwater runoff on the site. As discussed above, under the Community Input Alternative, the apartment's proposed subterranean parking would be constructed at 12 feet bgs near the historical high groundwater level elevation in the area, where groundwater could infiltrate subterranean parking during operations. Therefore, this Alternative would include basement waterproofing which could involve application of sealants on foundation walls to prevent infiltration, interior drainage systems to remove infiltration, or other methods to minimize groundwater infiltration in the subterranean parking area. Basement waterproofing methods could involve the removal of minimal groundwater. However, given the Project site is not located within a groundwater recharge basin, operations under this Alternative would not interfere with groundwater recharge and impacts would be less than significant.

The Community Input Alternative would result in similar impacts as the proposed Project regarding hydrology and water quality.

### Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations with Specific Plan, and Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, and Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6**. As discussed in **Section**



4.8: Land Use, the Project would not conflict with the GGP policies and plans, GMC standards or with the RTP/RCP's long-term goals and policies concerning air quality, water quality, transportation, and infrastructure. Therefore, the Project would result in a less than significant impact concerning a potential conflict with a GGP, GMC, or RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Community Input Alternative assumes similar entitlements and development as the Project; however, this Alternative proposes 17 percent fewer DU, as indicated in **Table 6-3**. Therefore, like the Project, this Alternative would not conflict with GGP policies and plans and GMC standards. Additionally, as discussed in the Community Input Alternative discussion regarding air quality, water quality, and transportation, this Alternative would not conflict with the RTP/RCP's long-term goals and policies concerning air quality, water quality, transportation, and infrastructure. Therefore, like the Project, this Alternative would result in less than significant impacts concerning a potential conflict with a GGP, GMC, or RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Community Input Alternative would result in similar impacts as the proposed Project regarding land use and planning.

#### Noise

The Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation measures (MM NOI-1 and MM NOI-2) concerning construction equipment and a temporary noise barrier, based on exceedance of noise standards, the proposed building height (seven stories), and extended construction period; see **Table 4.9-6**.

Construction activities under the Community Input Alternative would occur within the same footprint and distance from sensitive receptors as the Project. As compared to the Project, this Alternative would construct approximately 17 percent fewer DUs and approximately 62,000 fewer square feet, however, more grading and depth of excavation would be required for the parking garage. **Table 6-9: Community Input Alternative's Estimated Construction Noise Levels** provides the Alternative's estimated construction noise levels for various construction phases at the nearest offsite noise-sensitive receptors. The construction noise levels for the Community Input Alternative were estimated using the same methodology as the proposed Project. **Table 6-9** provides the Alternative's estimated construction noise levels at the nearest offsite noise-sensitive receptors with MM NOI-1 and MM NOI-2 incorporated; see **Section 4.9** for a description of the mitigation used in the construction noise analysis. As indicated in **Table 6-9**, construction noise for the Community Input Alternative would be the same as the proposed Project for all construction phases except the grading phase due to this Alternative's increased depth of excavation. Despite implementation of MM NOI-1 and MM NOI-2 achieving an approximately 12-dBA attenuation (i.e., noise reduction), the Community Input Alternative's construction noise levels at all six of the significantly impacted noise-sensitive receptors (i.e., receptor locations R1, R2, R4, R5, R6, and R7) would also exceed the City's specified thresholds. The Community Input Alternative would result in higher construction noise levels than the proposed Project only at Receptor R3, as it would be located nearest the apartment building's construction activities.



However, as identified in **Table 6-9**, although this Alternative's construction noise levels at Receptor R3 would be modestly greater than the Project's, this Alternative's construction noise levels would still be below the City's specified thresholds. Therefore, like the Project, this Alternative would still result in a significant unavoidable impact concerning construction noise, but to a slightly higher degree than the Project.



**Table 6-9: Community Input Alternative’s Estimated Construction Noise Levels**

<u>Receptor Location</u>	<u>Estimated Noise Levels by Construction Phase<sup>1</sup></u> <u>dBA (L<sub>eq</sub>)<sup>2</sup></u>						<u>Measured Ambient Noise Levels<sup>2</sup></u>	<u>Significance Threshold<sup>3</sup></u>	<u>Alternative Mitigated Noise Level<sup>4</sup></u>	<u>Proposed Project Mitigated Noise Level<sup>4</sup></u>
	<u>Demolition</u>	<u>Site Preparation</u>	<u>Grading</u>	<u>Foundation Construction</u>	<u>Building Construction</u>	<u>Paving/Landscaping</u>				
<u>R1</u>	<u>86.8</u>	<u>86.7</u>	<u>85.4</u>	<u>83.5</u>	<u>85.3</u>	<u>85.1</u>	<u>49.0</u>	<u>59.0</u>	<u>74.8</u>	<u>74.8</u>
<u>R2</u>	<u>83.8</u>	<u>83.7</u>	<u>82.1</u>	<u>80.4</u>	<u>81.4</u>	<u>81.1</u>	<u>55.1</u>	<u>65.1</u>	<u>71.8</u>	<u>71.8</u>
<u>R3</u>	<u>72.1</u>	<u>71.9</u>	<u>74.9</u>	<u>68.4</u>	<u>68.0</u>	<u>67.4</u>	<u>69.9</u>	<u>79.9</u>	<u>62.9</u>	<u>60.1</u>
<u>R4</u>	<u>81.2</u>	<u>81.0</u>	<u>79.4</u>	<u>77.7</u>	<u>78.0</u>	<u>77.6</u>	<u>56.9</u>	<u>66.9</u>	<u>69.2</u>	<u>69.2</u>
<u>R5</u>	<u>84.6</u>	<u>84.5</u>	<u>83.1</u>	<u>81.3</u>	<u>82.5</u>	<u>82.2</u>	<u>54.8</u>	<u>64.8</u>	<u>72.6</u>	<u>72.6</u>
<u>R6</u>	<u>84.6</u>	<u>84.5</u>	<u>83.1</u>	<u>81.3</u>	<u>82.5</u>	<u>82.2</u>	<u>54.6</u>	<u>64.6</u>	<u>72.6</u>	<u>72.6</u>
<u>R7</u>	<u>81.2</u>	<u>81.0</u>	<u>80.1</u>	<u>77.7</u>	<u>78.0</u>	<u>77.6</u>	<u>56.9</u>	<u>66.9</u>	<u>69.7</u>	<u>69.7</u>

**Notes:**

- Detailed calculation worksheets are included in **Appendix 6.0-1**.
- See **Table 4.9-5: Construction Equipment Noise Emission Reference Levels and Usage Factors**.
- 10 dBA over ambient threshold.
- With Mitigation Measure MM NOI-1: Construction Equipment Noise and MM NOI-2: Construction Noise implemented.

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1**.





As shown in **Table 4.9-11**, the Project's composite stationary source noise level would be below the significance thresholds, resulting in a less than significant impact. The Community Input Alternative would generate similar operational noise as the Project, but to a slightly lesser degree than the Project since this Alternative proposes 17 percent fewer DU. The Project would result in less than significant impacts from mobile noise sources. This Alternative would also be anticipated to result in less than significant impacts from mobile noise sources, however, proportionately less than the Project as this Alternative would generate fewer trips.

The Project's construction-related vibration impacts associated with human annoyance would be less than significant with mitigation incorporated (MM NOI-3). As indicated in **Table 4.9-12**, the Project's estimated vibration velocity levels from all construction equipment would be below the City's significance criteria at all offsite vibration-sensitive receptors, except receptor location R1.

**Table 6-10: Community Input Alternative Construction Vibration Impacts – Human Annoyance**, provides the Alternative's estimated construction-related vibration levels pursuant to the City's significance criteria of 80 VdB for human annoyance. The estimated construction vibration levels for the Community Input Alternative were estimated using the same methodology as the proposed Project. As indicated in **Table 6-10**, the estimated vibration velocity levels for the Community Input Alternative would be the same as the proposed Project for all pieces of construction equipment except this Alternative adds vibration from caisson drilling (required due to depth of excavation under this Alternative), which is not required for the proposed Project. The Community Input Alternative would result in higher construction vibration levels than the proposed Project only at receptor R4 as it would be closer to where the proposed apartment building drilling would occur under this Alternative. However, as also indicated in **Table 6-10**, although the construction vibration at this receptor location would be modestly higher under this Alternative than under the proposed Project, the construction vibration at this receptor would still be below the City's significance criteria of 80 VdB for human annoyance.

Under this Alternative, the estimated vibration velocity levels from all pieces of construction equipment would be below the City's significance criteria at all remaining offsite vibration-sensitive receptors, except receptor R1, where the estimated construction vibration level would be up to 87 VdB. To prevent the Community Input Alternative's construction-related vibration impacts, implementation of MM NOI-3: Construction Vibration Impacts, which prohibits the use of large construction equipment greater than 400 horsepower or loaded trucks within 45 feet from receptor location R1 would still be required for this Alternative. Additionally, the Community Input Alternative would result in the same construction vibration levels as the proposed Project at all remaining receptors identified in **Table 6-10**. Like the Project, this Alternative would still result in a less than significant impact with mitigation incorporated concerning construction vibration for human annoyance.



**Table 6-10: Community Input Alternative’s Construction Vibration Impacts – Human Annoyance**

<u>Receptor Location</u>	<u>Estimated Vibration Velocity Levels at the Offsite Vibration-Sensitive Receptors, VdB<sup>1</sup></u>					<u>Significance Threshold<sup>2</sup> VdB</u>	<u>Community Input Alternative Maximum Vibration Velocity</u>	<u>Alternative Significant Impact?</u>	<u>Proposed Project Maximum Vibration Velocity</u>	<u>Proposed Project Significant Impact?</u>
	<u>Large Bulldozer</u>	<u>Caisson Drilling</u>	<u>Loaded Trucks</u>	<u>Jack-hammer</u>	<u>Small Bulldozer</u>					
<u>FTA Reference Vibration Levels at 25 feet</u>	<u>87</u>	<u>87</u>	<u>86</u>	<u>79</u>	<u>58</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>
<u>R1</u>	<u>87</u>	<u>57</u>	<u>86</u>	<u>79</u>	<u>58</u>	<u>80</u>	<u>87</u>	<u>Yes</u>	<u>87</u>	<u>Yes</u>
<u>R2</u>	<u>78</u>	<u>53</u>	<u>77</u>	<u>70</u>	<u>49</u>	<u>80</u>	<u>78</u>	<u>No</u>	<u>78</u>	<u>No</u>
<u>R3</u>	<u>68</u>	<u>63</u>	<u>67</u>	<u>60</u>	<u>39</u>	<u>80</u>	<u>68</u>	<u>No</u>	<u>68</u>	<u>No</u>
<u>R4</u>	<u>74</u>	<u>75</u>	<u>73</u>	<u>66</u>	<u>45</u>	<u>80</u>	<u>75</u>	<u>No</u>	<u>74</u>	<u>No</u>
<u>R5</u>	<u>79</u>	<u>68</u>	<u>78</u>	<u>71</u>	<u>50</u>	<u>80</u>	<u>79</u>	<u>No</u>	<u>79</u>	<u>No</u>
<u>R6</u>	<u>75</u>	<u>69</u>	<u>74</u>	<u>67</u>	<u>46</u>	<u>80</u>	<u>75</u>	<u>No</u>	<u>75</u>	<u>No</u>
<u>R7</u>	<u>74</u>	<u>74</u>	<u>73</u>	<u>66</u>	<u>45</u>	<u>80</u>	<u>74</u>	<u>No</u>	<u>74</u>	<u>No</u>
1. <u>Vibration level calculated based on FTA reference vibration level at 25-foot distance.</u> 2. <u>Significance threshold is based on City vibration limit of 0.01 in/sec converted to VdB, 20*log(0.01*1,000,000).</u>										
Source <b>Appendix 4.9-1 Table 13.</b>										



The Project's construction-related vibration impacts associated with building damage would be less than significant. As indicated in **Table 4.9-13**, the estimated vibration velocity levels from construction equipment would be below the FTA's significance criteria for building damage of 0.2 PPV at the nearest offsite buildings.

**Table 6-11: Community Input Alternative Construction Vibration Impacts – Building Damage Criteria** provides the estimated vibration levels at the nearest offsite buildings for this Alternative. The construction vibration levels for the Community Input Alternative were estimated using the same methodology as the proposed Project. As indicated in **Table 6-11**, the estimated vibration velocity levels for the Community Input Alternative would be the same as the proposed Project for all pieces of construction equipment except this Alternative adds vibration from caisson drilling (required due to depth of excavation under this Alternative), which is not required for the proposed Project. The Community Input Alternative would result in higher construction vibration levels than the proposed Project only at the residential buildings to the north and east as they would be closer to where the apartment building drilling would occur under this Alternative. However, as also indicated in **Table 6-11**, although the construction vibration at these two buildings would be modestly higher under this Alternative than under the proposed Project, the construction vibration at these two buildings would still be below the FTA's significance criteria for building damage at all offsite vibration-sensitive receptors. Therefore, like the proposed Project, the Alternative's construction-related vibration levels, pursuant to the significance criteria for building damage, would be less than significant without mitigation.



**Table 6-11: Community Input Alternative’s Construction Vibration Impacts – Building Damage**

<u>Receptor Location</u>	<u>Estimated Vibration Velocity Levels at the Offsite Vibration-Sensitive Receptors, PPV<sup>1</sup></u>					<u>Significance Threshold<sup>2</sup> PPV</u>	<u>Community Input Alternative Maximum Vibration</u>	<u>Alternative Significant Impact?</u>	<u>Proposed Project Maximum Vibration</u>	<u>Proposed Project Significant Impact?</u>
	<u>Large Bulldozer</u>	<u>Caisson Drilling</u>	<u>Loaded Trucks</u>	<u>Jack-hammer</u>	<u>Small Bulldozer</u>					
<u>FTA Reference Vibration Levels at 25 feet</u>	<u>0.089</u>	<u>0.089</u>	<u>0.076</u>	<u>0.035</u>	<u>0.003</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>==</u>
<u>Residential building to the North</u>	<u>0.019</u>	<u>0.024</u>	<u>0.016</u>	<u>0.008</u>	<u>0.001</u>	<u>0.2</u>	<u>0.024</u>	<u>No</u>	<u>0.019</u>	<u>No</u>
<u>Residential buildings to the South</u>	<u>0.024</u>	<u>0.018</u>	<u>0.020</u>	<u>0.009</u>	<u>0.001</u>	<u>0.2</u>	<u>0.024</u>	<u>No</u>	<u>0.024</u>	<u>No</u>
<u>Residential buildings to the East</u>	<u>0.010</u>	<u>0.011</u>	<u>0.008</u>	<u>0.004</u>	<u>0.000</u>	<u>0.2</u>	<u>0.011</u>	<u>No</u>	<u>0.010</u>	<u>No</u>
<u>Commercial buildings to West</u>	<u>0.089</u>	<u>0.010</u>	<u>0.076</u>	<u>0.035</u>	<u>0.003</u>	<u>0.2</u>	<u>0.089</u>	<u>No</u>	<u>0.089</u>	<u>No</u>
<u>Residential building adjacent to the Project site</u>	<u>0.192</u>	<u>0.003</u>	<u>0.164</u>	<u>0.075</u>	<u>0.007</u>	<u>0.2</u>	<u>0.192</u>	<u>No</u>	<u>0.192</u>	<u>No</u>
1. <u>Vibration level calculated based on FTA reference vibration level at 25-foot distance.</u> 2. <u>Significance threshold is based on FTA vibration limit of 0.20 in/sec PPV.</u>										
Source <b>Appendix 4.9-1</b> Table 13.										



The Community Input Alternative would result in less impacts than the proposed Project regarding noise and vibration. The Community Input Alternative would result in similar construction noise impacts, similar construction-related vibration impacts, and less operational noise impacts. Notwithstanding, the Alternative would still have significant and unavoidable impacts regarding construction noise despite implementation of MM NOI-1 and MM NOI-2 and would still require implementation of MM NOI-3 to mitigate the vibration impacts to nearby sensitive receptors to less than significant levels.

### Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. This Alternative is forecast to generate proportionately less population growth than the Project given 17 percent fewer DUs would be constructed. Assuming 2.70 persons per household, this Alternative is forecast to generate a population growth of 899 persons. As with the proposed Project, this Alternative would induce unplanned population growth, but it would not be significant. Like the Project, this Alternative would not displace existing housing.

The 2021-2029 Housing Element Update identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6<sup>th</sup> Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6<sup>th</sup> Cycle RHNA allocation.

Under this Alternative, 70 fewer DUs (including 57 fewer market rate DUs and 13 fewer affordable housing DUs) would be provided. This Alternative would also be in furtherance of meeting the City's RHNA allocation, however, to a lesser degree than the Project. However, Housing Elements include a housing buffer in the site inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's provision of fewer market rate and affordable housing units would not preclude the City from meeting their RHNA obligation and the findings under Government Code § 65863 can be made.

The Community Input Alternative would result in similar impacts as the proposed Project regarding population and housing.

### Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting



in a less than significant impact. Like the proposed Project, this Alternative would incrementally increase demands on fire and police protection services, and library facilities, but to a lesser degree than the Project given fewer DUs would be developed. Notwithstanding, neither this Alternative nor the Project would result in a significant impact concerning fire and police protection services, or library facilities as neither would result in an adverse physical impact associated with the provision of new or physically altered facilities.

The Project is forecast to generate a student population growth of approximately 151 students at the LAUSD, which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with SB 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The Community Input Alternative would involve approximately 17 percent fewer DU, with proportionately less student population increase and demand for school facilities as the Project. Like the Project, payment of school impact fees would fully mitigate potential impacts and no physical impacts concerning school facilities would occur.

The Community Input Alternative would result in less demand for public services, as the Project since fewer DUs would be constructed. Like the Project, this Alternative would not result in an adverse physical impact 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 fire and police protection, or library services.

The Community Input Alternative would result in less impacts than the proposed Project regarding public services.

### Recreation

Neither the Project nor this Alternative would result in adverse physical impacts associated with governmental park facilities, since neither proposes to provide or physically alter a government park facility. Further, like the Project, the Community Input Alternative Applicant would be required to comply with GMC Chapter 17.20, which requires payment of fees for future recreational purposes in the City for the townhome units. Therefore, like the Project, impacts would be less than significant.

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but not to the degree that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Under the Community Input Alternative, fewer DUs would be developed, and proportionately less forecast population growth would occur. Therefore, this Alternative would also incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but to a lesser degree than the Project. Like the Project, this Alternative would not 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, and a less than significant impact would occur.



Like the Project, this Alternative proposes onsite open space and recreational amenities. The Project's proposed open spaces and recreational facilities are discussed as part of the overall environmental analyses of this EIR. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. However, given construction of the proposed open spaces and recreational facilities alone would not result in a significant and unavoidable impact concerning noise, construction or expansion of recreational facilities would not be considered to have an adverse physical effect on the environment and a less than significant impact with incorporation of mitigation would occur. Given this Alternative's proposed open spaces and recreational facilities would be similar in nature and scale to the Project's, their construction-related impacts would also not be considered significant with mitigation incorporated. Therefore, like the Project, this Alternative would result in less than significant environmental effects associated with construction of the proposed open spaces and recreational facilities, with mitigation incorporated.

The Community Input Alternative would incrementally increase the use of existing neighborhood and regional parks/other recreational facilities to a lesser degree than the Project, and therefore would result in less impacts as the Project regarding recreational facilities.

### Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and a less than significant impact would occur. The Community Input Alternative proposes a similar residential development layout, except the townhome's 170<sup>th</sup> Street access driveway would be relocated west to align with the Brighton Avenue at West 170<sup>th</sup> Street intersection. The modified access would not conflict with Community Development Element, Circulation Plan policies, nor other programs, plans, ordinances, or policies addressing the circulation system, transit, roadway, bicycle, or pedestrian facilities and would result in less than significant impacts.

The Project is located within a low VMT generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. This Alternative is on the same site, thus, would also be screened from further VMT, resulting in a less than significant impact concerning VMT.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. The Community Input Alternative would involve similar construction activities, and it would be



required to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access, similar to the Project. Following implementation of similar traffic management measures (i.e., PDF TR-1) as a part of this Alternative's construction, less than significant impacts would also occur.

The Community Input Alternative would result in similar impacts as the proposed Project regarding transportation.

#### Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with incorporation of MM TCR-1, MM TCR-2, and MM TCR-3, as requested by the Gabrieleno Band of Mission Indians-Kizh Nation. The Community Input Alternative would also involve demolition and ground disturbing construction activities similar to the Project, but increased depth of excavation due to the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering undiscovered tribal cultural resources, incorporation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to less than significant in the event tribal cultural resources are encountered.

The Community Input Alternative would be result in similar impacts as the proposed Project regarding tribal cultural resources.

#### Utilities and Service Systems

As shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9**, Project operations would increase wastewater generation, electricity demand, and water demand, but would decrease solid waste generation. The Project would require construction of new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. With mitigation incorporated, the Project's environmental effects from construction of new facilities would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. However, given construction of the proposed utilities and service systems alone would not result in a significant and unavoidable impact concerning noise, construction of the proposed utilities and service systems would not be considered to have an adverse physical effect on the environment and a less than significant impact with incorporation of mitigation would occur. The Community Input Alternative would also result in an overall increase from existing conditions in wastewater generation, electricity demand, and water demand, but proportionately less than the Project since this Alternative proposes 17 percent fewer DUs. Therefore, like the Project, this Alternative's environmental effects from construction of new facilities would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. However, given construction of the proposed utilities and service systems alone would not result in a significant and unavoidable impact concerning noise, construction of the proposed utilities and service systems would not be





considered to have an adverse physical effect on the environment and a less than significant impact with incorporation of mitigation would occur under this Alternative.

The Community Input Alternative would result in less demands concerning utilities and service systems than the Project, but similar impacts concerning environmental effects associated with construction of the proposed utilities and service systems.

### Aesthetics

The Project proposes a 403-unit apartment building and 75 townhomes. The maximum height of the apartment building would be seven stories above ground at approximately 90 feet from existing grade and the townhomes would be three stories above ground at approximately 40 feet from existing grade. Under this Alternative, the site's visual character/quality would be altered similar to the Project since the existing industrial use would be removed and replaced with residential uses (a 258 DU apartment building and 75 townhomes). However, under this Alternative, the site's visual character/quality would be altered to a lesser degree than the Project, given the apartment building under this Alternative would be only five stories above ground at a maximum of 70 feet from existing grade, whereas the Project proposes seven stores at a maximum of 90 feet from existing grade.

The Project would not result in a significant source of light or glare. This Alternative proposes 70 fewer DU, thus aesthetic impacts from light and glare would be proportionately less under this Alternative compared to the Project. As with the Project, this Alternative would result in less than significant light and glare impacts.

The Community Input Alternative would result in less impacts than the proposed Project regarding aesthetics/light and glare.

### ABILITY TO MEET PROJECT OBJECTIVES

The Community Input Alternative would fulfill most of the Project objectives but would provide fewer market rate and affordable housing units. This Alternative would still support the expanding technology and creative sector with newly constructed high-quality housing opportunities, cluster urban residential development near technology firms and large employment centers, establish housing development that meets high standards of design and pursues environmental sustainability, and redevelop a blighted site while increasing tax revenues to the City and supporting the City's RHNA goals. However, because this Alternative proposes 70 fewer DU (13 fewer affordable housing and 57 fewer market rate DU) than the Project, this Alternative would not accomplish these objectives to the same degree as the Project. In addition, the tax revenues to the City would be proportionately reduced and the City's RHNA goals would be supported to a lesser degree. This Alternative would not avoid the Project's unavoidable significant construction-related noise impacts and would result in similar construction-related vibration impacts as the proposed Project. Notwithstanding, construction-related noise and vibration impacts are temporary and intermittent. The Community Input Alternative would result in similar construction noise, similar construction-related vibration impacts, and less operational



noise impacts. Notwithstanding, the Alternative would still have significant and unavoidable impacts regarding construction noise despite implementation mitigation, similar to the Project.

## **DEIR Section 6.0: Alternatives To The Proposed Project**

### *DEIR Page 6-63*

According to State CEQA Guidelines §15126.6(e)(2), “No Project” Alternative, “If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” ~~Table 6-3~~ Table 6-12 summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project). As indicated in ~~Table 6-3~~ Table 6-12, the environmentally superior Alternative is the No Project/No Construction Alternative. Among the other Alternatives, the Reduced Density Alternative is the environmentally superior Alternative. As shown in ~~Table 6-3~~ Table 6-12 and ~~Table 6-4~~ Table 6-13, it would result in similar or less impacts for all resources areas except population and housing, for which it would result in greater impacts than the Project. However, this Alternative would not eliminate the only unavoidable significant impact of construction noise and would not achieve the objectives to the same degree as the proposed Project.



**Table 6-4 Table 6-12: Comparison of Alternatives**

Sections	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density	<u>Alternative 6.4.5: Community Input</u>
Air Quality	✓	✓	✓	✓
Cultural Resources	✓	=	=	≡
Energy	▲	✓	✓	✓
Geology, Soils, and Paleontological Resources	✓	=	=	≡
Greenhouse Gas Emissions	✓	✓	✓	✓
Hazards & Hazardous Materials	✓	▲	=	≡
Hydrology & Water Quality	▲	▲	=	≡
Land Use & Planning	✓	✓	=	≡
Noise*	✓	▲**	✓**	✓**
Population & Housing	▲	▲	▲	≡
Public Services	✓	=	✓	✓
Recreation	✓	✓	=	✓
Transportation	✓	✓	=	≡
Tribal Cultural Resources	✓	=	=	≡
Utilities & Service Systems	✓	=	=	≡
Aesthetics	▲	✓	✓	✓

▲ Indicates an impact that is greater than the proposed Project (environmentally inferior).  
 ✓ Indicates an impact that is less than the proposed Project (environmentally superior).  
 = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior).  
 \*\* Impact would still be significant and unavoidable.



**Table 6-13: Alternatives Ability to Meet Project Objectives**

Would the Alternative:	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density	Alternative 6.4.5 <u>Community Input</u>
Diversify the City of Gardena’s existing housing options, by providing a range of housing types and sizes, to serve the region’s growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies?	No	No	Yes – but to a lesser degree	<u>Yes – but to a lesser degree</u>
Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work?	No	No	Yes – but to a lesser degree	<u>Yes – but to a lesser degree</u>
Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles?	No	No	Yes – but to a lesser degree	<u>Yes – but to a lesser degree</u>
Establish housing development that meets high standards of design and pursues environmental sustainability?	No	No	Yes	<u>Yes</u>
Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City’s Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.	No	No	Partially, it would not provide affordable housing.	<u>Yes – but to a lesser degree</u>



## DEIR Appendix 4.13-2: Local Transportation Assessment

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### 3.3.1 Freeway Ramp & Intersection Queueing at State Facilities

As detailed below in section 3.7, based on the Project's estimates, trip generation and distribution, few trips are expected at the I-405 off-ramps to Normandie/190<sup>th</sup> or the I-110 off-ramps to Redondo Beach Boulevard (<25 peak hour trips at each location). Therefore, the Project is not expected to add two or more car lengths to these off-ramp queues during peak hours, exacerbate potentially unsafe ramp conditions at these locations (if such conditions exist or are projected to occur in the opening year of the Project), and analysis is not needed. At the intersection of SR-91 and Vermont Avenue, Project traffic is expected to primarily be eastbound and westbound through movements since primary Project access is from Normandie Avenue, where most turning movements would occur. As such, the Project is not expected to add substantial traffic to any left or right-turning movements at the intersection of SR-91 and Vermont Avenue, and the Project is not expected to materially affect the utilization of turn pocket storage that would lead to an impedance of through traffic. Therefore, no further analysis is needed related to queueing at these locations.

### 3.3.2 Pedestrian & Bicycle Volumes at State Facilities

As detailed below in section 3.7, 5% of the Project's net new trips are expected to be walking or biking in nature, which may also include a subsequent trip on transit. This amounts to less than 10 trips during either peak hour in total. Most of these non-transit biking and walking trips are expected to be local in nature, accessing nearby schools and businesses within 0.5 miles of the Project Site. Substantial bicycle and pedestrian trips generated by the Project are not expected to occur at the SR-91 and Vermont Avenue, I-405 off-ramps at Normandie/190<sup>th</sup>, or I-110 off-ramps at Redondo Beach Boulevard intersections given how far away they are from the Project Site. SR-91 and Vermont Avenue is located 0.8 miles from the Project Site, while the other two intersections are located over one mile from the Project Site. Because these locations are outside of the Project Study Area, Multi-Modal Conflict Analyses and/or Complete Street Access considerations should not be necessary.



## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that all public agencies establish monitoring and/or reporting procedures for mitigation adopted as conditions of approval in order to mitigate or avoid significant environmental impacts. This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to monitor mitigation measures (MMs) outlined in the Gardena Normandie Crossing Specific Plan Project (“Project”) Environmental Impact Report (EIR). The Project MMRP has been prepared in conformance with Public Resources Code § 21081.6 and City of Gardena (“City”) monitoring requirements. Specifically, Public Resources Code § 21081.6 states:

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

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

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

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



The MMRP is comprised of the Mitigation Program and includes measures to implement and monitor the Mitigation Program. The MMRP defines the following for each MM:

- **Definition of Mitigation.** The Mitigation Measure contain the criteria for mitigation, either in the form of adherence to certain adopted regulations or identification of the steps to be taken in mitigation.
- **Responsible Party or Designated Representative.** Unless otherwise indicated, an applicant would be the responsible party for implementing the mitigation, and the City of Gardena or designated representative is responsible for monitoring the performance and implementation of the mitigation measures. To guarantee that the mitigation will not be inadvertently overlooked, a supervising public official acting as the Designated Representative is the official who grants the permit or authorization called for in the performance. Where more than one official is identified, permits or authorization from all officials shall be required.
- **Time Frame.** In each case, a time frame is provided for performance of the mitigation or the review of evidence that mitigation has taken place. The performance points selected are designed to ensure that impact-related components of project implementation do not proceed without establishing that the mitigation is implemented or ensured. All activities are subject to the approval of all required permits from agencies with permitting authority over the specific activity.

The numbering system in the table corresponds with the Draft EIR numbering system. The MMRP table “Verification” column will be used by the parties responsible for documenting when the mitigation measure has been completed. The City will complete ongoing documentation and mitigation compliance monitoring. The completed MMRP and supplemental documents will be kept on file at the City Community Development Department.



## NORMANDIE CROSSING SPECIFIC PLAN PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<b>CULTURAL RESOURCES</b>					
<b>MM CUL-1: Inadvertent Discovery of an Archaeological Resource.</b> Before ground disturbing activities are initiated on the Project site, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site’s history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction. If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.	Prior to any Ground Disturbance	Notification to Construction Personnel	General Contractor		
	During Construction, If an Archaeological Resource is Discovered	Archaeological Resource Evaluation	Qualified Archaeologist		





MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<b>GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES</b>					
<b>MM GEO-1: Monitor for Paleontological Resources:</b> Monitoring shall be conducted by a Paleontological Monitor, defined as one who meets the SVP standards for a Paleontological Resource Monitor. The Paleontological Monitor shall be under the supervision of the Project Paleontologist. As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments that occur in previously undisturbed sediment, which has been estimated as any portion of the Project site where excavation exceeds 0.9 m (3.0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated.	During Ground Disturbance	Paleontological Resources Monitoring	Paleontological Monitor		
<b>HAZARDOUS MATERIALS &amp; WASTES</b>					
<b>MM HAZ-1: Construction Management Plan.</b> Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.	Prior to Demolition Permit Issuance	Prepare a Construction Management Plan	Community Development Director		
<b>MM HAZ-2: Engineered Vapor Mitigation and Ventilation.</b> Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the	Prior to Construction Activities	Verification of an engineered vapor measure within the design of all townhomes and apartment parking structures.	Building and Safety Department Chief Building Official		



MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Project site. The impermeable vapor membrane shall not underlay non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.					
<b>NOISE</b>					
<b>MM NOI-1: Construction Equipment Noise.</b> Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.	Prior to issuance of any demolition or grading permit	Verification of provisions that require all power construction equipment to be equipped with noise shielding and muffling devices and properly maintained	Public Works Director		
<b>MM NOI-2: Construction Noise.</b> A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.	Prior to and During Construction	Provide a Temporary and Impermeable Sound Barrier	Community Development Director		
<b>MM NOI-3: Construction Vibration Impacts.</b> The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 Brighton Ave).	During Construction	Provide a minimum 45-foot buffer away from residences adjacent to the Project site	Community Development Director		





MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<p>American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe.</p> <p>D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.</p>					
<p><b>MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.</b></p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code § 5097.98, are also to be treated according to this statute.</p> <p>B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the</p>	<p>During Construction, Upon Discovery of any human remains or grave goods</p>	<p>Telephone communication with the Native American Heritage Commission within 24 hours</p>	<p>County Coroner</p> <p>Native American Heritage Commission</p> <p>Qualified Tribal Monitor/Consultant</p>		



MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<p>Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed.</p> <p>C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2).</p> <p>D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).)</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>					
<p><b>MM TCR-3: Procedures for Burials and Funerary Remains.</b> This mitigation measure shall only apply if the Gabrieleno Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant (“MLD”) by the NAHC:</p> <p>A. The Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.</p> <p>B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.</p> <p>C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact.</p>	<p>During Construction, if an Unanticipated Discovery, and the Gabrieleno Band of Mission Indians – Kizh Nation is Designated Most Likely Descendant</p> <p>If there are four or more burials</p>	<p>Implement Koo-nas-gna Burial Policy</p> <p>Creation of a cemetery treatment plan</p>	<p>Tribal Monitor/Consultant</p>		



MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<p>Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.</p> <p>D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials will be removed.</p> <p>E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects.</p> <p>F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon</p>	<p>If discovered remains cannot be fully documented and recovered on the same day</p> <p>If preservation in place is not possible</p>	<p>Covering of remains with muslin cloth and a steel plate to protect remains          -or-          24-hour guard outside working hours</p> <p>Designation of site location within the footprint of the Project for reburial</p>	<p>Gabrielino Band of Mission Indians-Kizh Nation          Native American Heritage Council</p>		



MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<p>between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.</p> <p>G. The Tribe will work closely with the Project’s qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.</p>					