

# Modelo Project Initial Study

*Prepared for:*

## **City of Commerce**

Public Works and Development Services Department

2535 Commerce Way

Commerce, California 90040

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*Prepared by:*

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# AUGUST 2019



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# Acronyms and Abbreviations

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Acronym/Abbreviation	Definition
AB	Assembly Bill
C/M1	Commercial/Manufacturing
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CO	carbon monoxide
CRHR	California Register of Historical Resources
EIR	environmental impact report
ELA	East Los Angeles
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
HCP	Habitat Conservation Plan
I-5	Interstate 5
IS/MND	initial study/mitigated negative declaration
LACSD	Los Angeles County Sanitation District No. 2
LED	Light Emitting Diode
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
MND	Mitigated Negative Declaration
NB	northbound
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
O <sub>3</sub>	ozone
PF	Public Facility
PM <sub>10</sub>	particulate matter with an aerodynamic diameter equal to or less than 10 microns
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
PRC	Public Resources Code
RWQCB	Regional Water Quality Control Board
SB	southbound
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
WQMP	Water Quality Management Plan

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# 1 Introduction

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## 1.1 Project Overview

The City of Commerce (City) received a development application from Comstock Realty Partners (Project Applicant) for a mixed-use development including park and open space, residential, and commercial uses. The proposed Modelo Project (Project) includes the reconstruction of the existing Veterans Memorial Park and adjacent vacant parcel into a revitalized Veterans Memorial Park, 825 residential units, and approximately 165,000 square feet of entertainment retail. The Project site was previously used for landfill operations, and thus, a component of the Project involves remediation to allow for construction of the Project. Additionally, the Project would enhance transit connection to the Project site.

The Project is the subject of analysis in this document pursuant to the California Environmental Quality Act (CEQA). In accordance with the State CEQA Guidelines, Section 15367 (14 CCR 15367), the City is the lead agency with principal responsibility for considering the Project for approval. The proposed Project requires a Development Agreement, a General Plan Amendment to change the land use designation from Public Facilities to Commercial, a Specific Plan/Zone Change, Master Sign Plan, a Vesting Tentative Tract Map, and environmental review in accordance with CEQA.

## 1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code (PRC) Sections 21000–21177, applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies that have the potential to adversely affect the environment (PRC Section 21000 et seq.). The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental effects of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on a project. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project’s environmental concerns with other goals and benefits in a statement of overriding considerations.

This Initial Study has been prepared by the City as the lead agency in accordance with the State CEQA Guidelines to evaluate the potential environmental effects and to determine whether an Environmental Impact Report (EIR), a Negative Declaration (ND), or a Mitigated Negative Declaration (MND) should be prepared for the Project. The Initial Study has also been prepared to satisfy CEQA requirements of other agencies that may provide approvals and/or permits for the Project.

The City’s Public Works & Development Services Department directed and supervised the preparation of this Initial Study. Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this Initial Study reflect the sole independent judgment of the City. Considering the Project has the possibility of creating a significant impact, the preparation of an EIR is required by CEQA. Furthermore, as required by State CEQA Guidelines Section 15126.6, the City will include the consideration and discussion of alternatives to the Project in the EIR.

## 1.3 Public Review Process

Pursuant to State CEQA Guidelines Section 15073, the Initial Study will be available for a public comment period of no less than 30 days from August 19, 2019 to September 17, 2019. In reviewing the Initial Study, affected public agencies and the interested public should focus on the sufficiency of the document in identifying the potential impacts of the Project on the environment. A hardcopy of the IS/MND is also available for public review during regular business hours at:

City of Commerce City Hall  
Planning Public Counter  
2535 Commerce Way  
Commerce, California 90040

An electronic copy of the Initial Study can be viewed at: <http://www.ci.commerce.ca.us/index.aspx?NID=357>

In reviewing the Initial Study, interested members of the public should focus on the specific detail about the scope and content of the environmental information related to identifying and analyzing potential Project impacts on the environment. Comments on the Initial Study should be submitted by the end of the above-referenced 30-day public review period and must be postmarked by to September 17, 2019. Please submit written comments to Joseph Palombi at the City's address above, or via email to [jpalombi@ci.commerce.ca.us](mailto:jpalombi@ci.commerce.ca.us).



# 2 Project Description

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## 2.1 Project Location

The Project is located in the City of Commerce, within the south central portion of Los Angeles County (County), approximately six miles east of Downtown Los Angeles. The City is bounded by the cities of Montebello and Pico Rivera to the east, unincorporated East Los Angeles to the north, the cities of Vernon, Bell, and Maywood to the west, and the cities of Bell Gardens and Downey to the south. The Project site is located in the southeastern corner of the City, near the City's boundaries with Bell Gardens, Downey, Pico Rivera, and Montebello (Figure 1, Project Location).

The Project site is located immediately west of the Interstate 5 (I-5) freeway, south of Zindell Avenue, and east of a single-family residential neighborhood located west of Avenida Aguascalientes, and north of the Rio Hondo River and Path. The addresses associated with the Project site consist of 7316 Gage Avenue and 6364 Zindell Avenue. The Project site is comprised of the following four Assessor Parcel Numbers (APNs):

- 6357-018-005 (7.92 acres)
- 6357-018-904 – Parcel 1 (4.98 acres)
- 6357-019-904 – Parcel 2 (4.40 acres)
- 6357- 019-905 (.0199 acre)

## 2.2 Existing Setting

### **Surrounding Land Uses**

The Project site is in a highly urbanized area and is surrounded by a mix of residential, commercial, industrial, and open space land uses. To the east, across the I-5 freeway, within the City of Montebello, are various commercial businesses. To the north, is a Denny's, Best Western Plus Commerce Hotel, and a warehouse (east of Zindell Avenue) and single-/multi-family dwellings (west of Zindell Avenue). To the west, there is a single-family residential neighborhood and neighborhood commercial center. To the south, is the Rio Hondo River and Path, and single-family dwellings within the City of Downey.

### **Project Site Conditions**

The approximately 17.32-acre Project site currently consists of the Veterans Memorial Park and a vacant lot. The parcels comprising the Project site were previously part of a construction borrow-pit type of landfill created for, and during, the construction of the I-5 freeway. The native soil was removed from the Project site and placed within the footprint of the I-5 freeway. The landscape and structures that were previously within the footprint of the I-5 freeway were razed and placed in the hole where native soil on the Project site had been removed. The landfill operated between 1948 to 1954, before being covered and redeveloped. Limited outside waste was accepted during this period of time.

The Veterans Memorial Park was constructed between 1965 and 1970, and consists of a baseball diamond, two basketball courts, a community center, a parking lot, and miscellaneous outdoor recreational spaces. Due to the age of Veterans Memorial Park, the utility of the improvements made are deteriorating and the outdoor

spaces are aging. In addition, the existing community center has been shuttered due to structural and safety issues, and temporary trailers are used in lieu of the community center. Over time, much of the ground surface at the Veterans Memorial Park, which is sitting atop the landfill material from 1954, have settled over the weight of different types of debris. The vacant lot to the east of Veterans Memorial Park has been vacant since 1988, at which time an industrial structure that was formerly the International Paper (grocery bag) factory was demolished. The vacant lot is paved with asphalt and concrete (Figure 2, Existing Site Conditions).

### **General Plan and Zoning**

The City of Commerce General Plan Land Use Plan was adopted in January 2008 to establish and maintain an orderly pattern of development in the City, utilize land use classification as a means to implement the City's land use policies, identify permitted land uses and their location and distribution, and establish standards for development density and intensity. The City is currently in the process of updating its General Plan; however since the new General Plan has not yet been adopted, this discussion will only refer to the General Plan adopted in 2008. The City's General Plan Land Use Map designates the Veterans Memorial Park as Public Facilities and the vacant lot as Commercial Manufacturing (City of Commerce 2009). School sites, government offices, utility and transportation easements, and libraries all fall within the Public Facilities land use designation. This designation corresponds with the Public Facility (PF) zone designation. The Commercial Manufacturing designation is designed to encourage a balanced mix of commercial, office professional, and light manufacturing uses along a number of high visibility traffic corridors. This land use designation corresponds to the Commercial/Manufacturing (C/M1) zone district (City of Commerce 2008).

The Veterans Memorial Park is zoned PF and the vacant lot is zoned C/M1 (City of Commerce 2015) (Figure 3, Zoning Map). The PF zone is intended to provide adequate space for public and quasi-public community facilities. Permitted uses within the PF zone include municipal and other government buildings, public educational facilities, religious facilities, and recreational areas (City of Commerce 2018). The C/M-1 zone is intended to concentrate commercial and light industrial uses along major arterials and in other areas that are easily accessible. The industrial uses considered appropriate in the C/M-1 zone are limited to support services, such as machine shops and some light manufacturing. Commercial or industrial uses that might create offensive levels of noise, air pollution, glare, radioactivity or other nuisances are prohibited from this zone (City of Commerce 2018).

### **Transportation and Transit**

Major streets surrounding the Project site include Slauson Avenue, Telegraph Road, Gage Avenue, Garfield Avenue, and Florence Avenue. The I-5 freeway and the Los Angeles Metropolitan Transportation Authority's (Metro) Gold Line railway provide regional access in the City. The I-5 freeway, an eight-lane-above-grade facility, runs northwest to southeast through the City and is located approximately 60 feet to the Project site's eastern boundary. Local access to the Project site is provided via the I-5 freeway northbound (NB) and southbound (SB) ramps at Slauson Avenue. The Metro Gold Line's eastern terminus at the Atlantic Station in East Los Angeles is approximately 4.34 miles northwest of the Project site. From the Atlantic Station, several Metro Local Lines would connect to the Project site. Metro Local Line stops located within 0.5-mile of the Project site include Line 62 at Telegraph Road and Slauson Avenue and Line 108 at Slauson Avenue and Gage Avenue. Additionally, Commerce Bus Line stops located within 0.5-mile of the Project site include the Orange Route stop at Eastern Avenue and Washington Boulevard, the Green Route stop at Kuhl Drive and Zindell Avenue, and the Yellow Route at Greenwood Avenue and Gage Avenue.

Metro is preparing a Supplemental/Recirculated Draft EIR for the Eastside Transit Corridor Phase 2 Project, which proposes to extend the Gold Line further east from its current terminus at the Atlantic Station in East Los Angeles

to South El Monte via State Route (SR-) 60 and/or Whittier along Washington Boulevard in Pico Rivera. The proposed Washington Boulevard extension would place a station at Washington Boulevard and Rosemead Boulevard, approximately 1.6 miles northeast of the Project site. Metro anticipates releasing a draft environmental document for public review and comment in 2021, followed by public hearings in the project area to gather community input and comments on the draft environmental document (Metro 2019) (Figure 4, Eastside Transit Corridor Phase 2 Project).

## 2.3 Proposed Project

The Project involves reconstruction of Veterans Memorial Park and an adjacent vacant parcel into a mixed-use development, including public community uses, 825 residential units, and approximately 165,000 square feet of entertainment retail uses (Figure 5, Conceptual Site Plan). Additionally, due to the previous use of the Project site as a landfill, the Project involves remediation to allow for safe implementation of the Project. The Project proposes to revitalize Veterans Memorial Park with new structures, a playground, a soccer and baseball youth sports complex, a library, a grass-stepped amphitheater, and additional outdoor green space. The Project would include 825 new residential units, comprised of a mixture of 25-50 townhomes for sale, and the rest for-rent apartment and townhouse style units. Additionally, the Project would include approximately 165,000 square feet of entertainment retail, including a multi-screen Cineplex, a gaming/bowling/family venue, and restaurants (Figure 6a, Project Rendering Northeast View; Figure 6b, Project Rendering Southwest View). Upon approval of the Project, the land use designation of the Veterans Memorial Park portion would change from Public Facilities to Commercial Manufacturing, with the corresponding Specific Plan zone.

### **Veterans Memorial Park**

The new structures proposed as part of the new Veterans Memorial Park include a 30,000-square-foot Community Center, a 15,000-square-foot sports structure, and a 4.75-acre youth sports field complex and public open area (Sports Complex), located on the eastern portion of the Project site along the I-5 freeway. The Community Center would include community services, a library, a computer lab, a day-care center, a senior center, and meeting rooms. Additionally, the 15,000-square-foot sports structure would be two stories in height, including volleyball, basketball, and futsal soccer. The Sports Complex would be comprised of youth-sized soccer and baseball fields to accommodate local and regional league and tournament matches, an all-inclusive playground, and open green space. The green space would lead towards the grass-stepped amphitheater, which includes concrete bench steps. The Project also proposes an art component, including a 5,000-square-foot Latino Museum, and murals.

### **Residential**

The 825 residential units would be split into several Type 5a, 5b and 3b construction structures of varying heights on the western portion of the Project site. Townhomes would be constructed as Type 5a or 5b, varying from two to three stories in height, and would be no more than 35 feet in height to the roof parapet. A private pool for townhome owners would be located in close proximity to the proposed townhomes. Parking is proposed as a combination of in-unit grade-level garage and subterranean parking accessible from the structure beneath the for-rent apartment units.

The apartment and townhouse for-rent units would vary from 35 feet to 65 feet in height to the roof parapet. Private access pools would be allocated to every two residential structures. Each structure would include its own event

spaces, amenity rooms, package rooms, and bicycle storage areas. Direct, private access from subterranean parking to each residential building would be provided.

### **Entertainment Retail**

The entertainment retail component of the Project would consist of two structures located along the north and east edges of the site. The uses proposed within the entertainment retail portion includes approximately 92,000 square feet for a movie theatre, approximately 16,000 square feet for restaurant uses, approximately 20,000 square feet for an entertainment/arcade, approximately 15,000 square feet for a grocery store, and approximately 6,000 square feet for a pharmacy.

### **Parking and Site Access**

The Project would provide 1.5 parking spaces per unit, so a total of 1,275 spaces, 50 of which would be above-grade, and 75 of which would be loading-zone spaces. The Project would provide approximately 525 spaces for commercial uses. The subterranean parking structure would be constructed beneath the retail, Community Center, and residential living areas. Public access would be provided for the Community Center and retail visitors. Private access would be provided for residential uses. Passenger vehicle access to the Project site would occur from either the Gage Avenue driveway on the eastern parcel, or from the end of Zindell Avenue into the western parcel. Vehicular traffic from retail and park services would be routed through the Gage Avenue driveway, and directed away from residential uses.

### **Transportation and Transit**

The Project proposes to add a Commerce Bus Line stop at Veterans Park, near the Community Center and retail uses, on the eastern portion of the Project site. Additionally, a connection from the Commerce Bus Line to the proposed Washington Boulevard Metro Gold Line Extension, at Washington Boulevard and Rosemead Boulevard in the City of Pico Rivera, would provide access to the Project site. The Project proposes to enhance the existing bus stops at Slauson Avenue and Gage Avenue through additional shade, seating, and signage.

Bicycle parking for visitors and residents would be provided throughout the Project site. Bicycle path traffic from the Rio Hondo Bike Path would be encouraged to use the new Veterans Park amenities, as well as the proposed entertainment retail uses.

### **Sustainability**

The Project would include energy-saving and sustainability goals, aiming to optimize building performance and enhance interior environments to promote health and well-being. Some of these features include:

- UVA and UVB-resistant windows and glass/glazing throughout the Project
- Maximally-filtered mechanical ventilation systems in all structures
- Reclaimed water usage in landscaping and outdoor space irrigation
- Low-water usage and native planting throughout the landscaping
- Maximum shade for residential windows and retail spaces, provided by trees, awnings, and louvers, to reduce energy usage (designed according to solar patterns)
- Turf versus living grass in high foot-traffic areas of youth sports complex and Veterans Park

- Connection to City of Commerce’s Community Choice Provider Energy Purchasing Program
- Solar-path driven design of pool and window locations to reduce need for cooling and heating
- Low-vapor flooring, wall-coating, and paint materials throughout the Project
- Light Emitting Diode (LED) and low-energy light fixtures and bulbs throughout the Project
- Low petroleum-content paving throughout the Project
- Energy provided by Photo-voltaic cells, where possible.
- Managed cooling systems provided by ventilation, where and when seasonally possible.
- Highly insulated roof membranes and structures
- LEED status
- Electric car chargers

## 2.4 Project Objectives

The primary objectives of the Project include the following:

- Create a welcoming pedestrian-friendly contemporary village that will complement and enhance the City of Commerce and Southeast Los Angeles community.
- Provide an attractive lifestyle for residents, as well as draw visitors to the public space, youth sports complex, all-inclusive playground, and entertainment options from all over Southern California.
- Provide a revitalized Veterans Memorial Park with new structures, an all-inclusive playground, a contemporary soccer and baseball youth sports complex, a contemporary library, and ample outdoor green space to maximize opportunities for community events and services.
- Create open and green public spaces that will integrate the Project’s community space with the mixed-use entertainment/retail and residential structures.
- Enhance transit connections by and between the City of Commerce and Metro bus services and the future Metro Gold Line extension planned for Washington Boulevard in Pico Rivera.
- Create a progressive, forward-looking and vibrant community that is a desirable place for people to live, work, and play, all while offering robust community services for all.
- Provide connections to the Rio Hondo River and Path, as well as the surrounding neighborhood.
- Transform a deteriorating public park and vacant industrial lot into a 21<sup>st</sup>-Century mixed-use development that integrates vitally important public community uses with robust private development.
- Remediate, remove, and clean the former on-site landfill to provide a safer environment for future park visitors and residents.
- Provide new residential units comprised of a mixture of townhomes for sale and for-rent apartment and townhouse style units.
- Provide leading-edge environmentally friendly features in an effort to reduce the use of non-sustainable energy, reduce the Project’s overall carbon footprint, encourage an outdoor and pedestrian lifestyle, and limit the visitors’ and residents’ exposure to harmful pollution.

## 2.5 Project Construction

### Remediation

A Remedial Action Plan for the vacant lot on the Project site was approved in August 2016 by the Los Angeles Regional Quality Control Board (RWQCB), and would be amended and expanded to include remediation of the entire Project site. Remediation of the Project site involves the excavation and removal of all former landfill debris and contaminated soils to an approximately 20-foot depth. The excavation of soils is estimated to be approximately 380,000 cubic yards (cy) that would be transferred to a RWQCB-approved landfill site in Southern California. Upon removal, the Project's soil-bottoms and sidewalls would be tested to ensure all contaminants and debris have been removed.

### Construction

Once the RWQCB has deemed remediation to be complete, construction of the Project could proceed. The initial construction process entails construction of separate subterranean parking structures beneath the retail, community center, and residential living areas. The next phase involves developing the topography of the proposed green spaces. Next, the Community Center, entertainment retail uses, and Phase I of the 400-450 residential units would be constructed. As the final phase (Phase II) of the Project, the additional 400 residential units would be constructed.

Project construction would entail demolition and grading of the Project site, followed by construction of the proposed uses. Construction of the Project is anticipated to commence in May 2020 and would terminate in April 2023. Construction activities would include demolition, site preparation, grading/earthwork, building construction, paving, and architectural coating. During the most intensive phase of construction, approximately 105 workers would be required per day and approximately 64 truck trips would occur per day. Off-road construction equipment that would be used during construction would include an excavator, a skid steer loader, rollers, air compressors, a forklift, and a crane.

It is estimated that the Project would require excavation to approximately 20 feet below ground surface. The total cut for the Project would involve approximately 380,000 cubic yards (cy) of earthwork materials, which would be exported from the Project site. The total fill required for the Project would include approximately 85,000 cy of earthwork materials, which would be imported to the Project site.

## 2.6 Required Approvals

The City of Commerce is expected to use the EIR in its decision-making relative to the Project. The required discretionary approvals that are sought by the City of Commerce include the following:

- Development Agreement
- General Plan Amendment (change the land use designation from Public Facilities to Commercial)
- Specific Plan/Zone Change
- Master Sign Plan
- Vesting Tentative Tract Map
- Approval of the Project and Certification of the Final EIR
- Construction, Building, Grading, and Occupancy Permits

Approvals from other agencies may also be required and are listed as follows:

- State Water Resources Control Board – Project Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit
- Los Angeles RWQCB – Approval of updated Remediation Action Plan for the entire Project
- Los Angeles County Fire Department – Plan approval
- Los Angeles County Sheriff’s Department – Plan approval
- Utility providers – Utility connection permits

## 2.7 References

City of Commerce. 2008. *City of Commerce 2020 General Plan*. Adopted January 2008.

<http://www.ci.commerce.ca.us/DocumentCenter/Home/View/152>.

City of Commerce. 2009. “Land Use Map.” Printed August 6, 2009. <http://www.ci.commerce.ca.us/DocumentCenter/Home/View/349>.

City of Commerce. 2015. “Zoning Map.” Revision December 29, 2015. <http://www.ci.commerce.ca.us/DocumentCenter/View/4486><http://www.ci.commerce.ca.us/DocumentCenter/View/4486>.

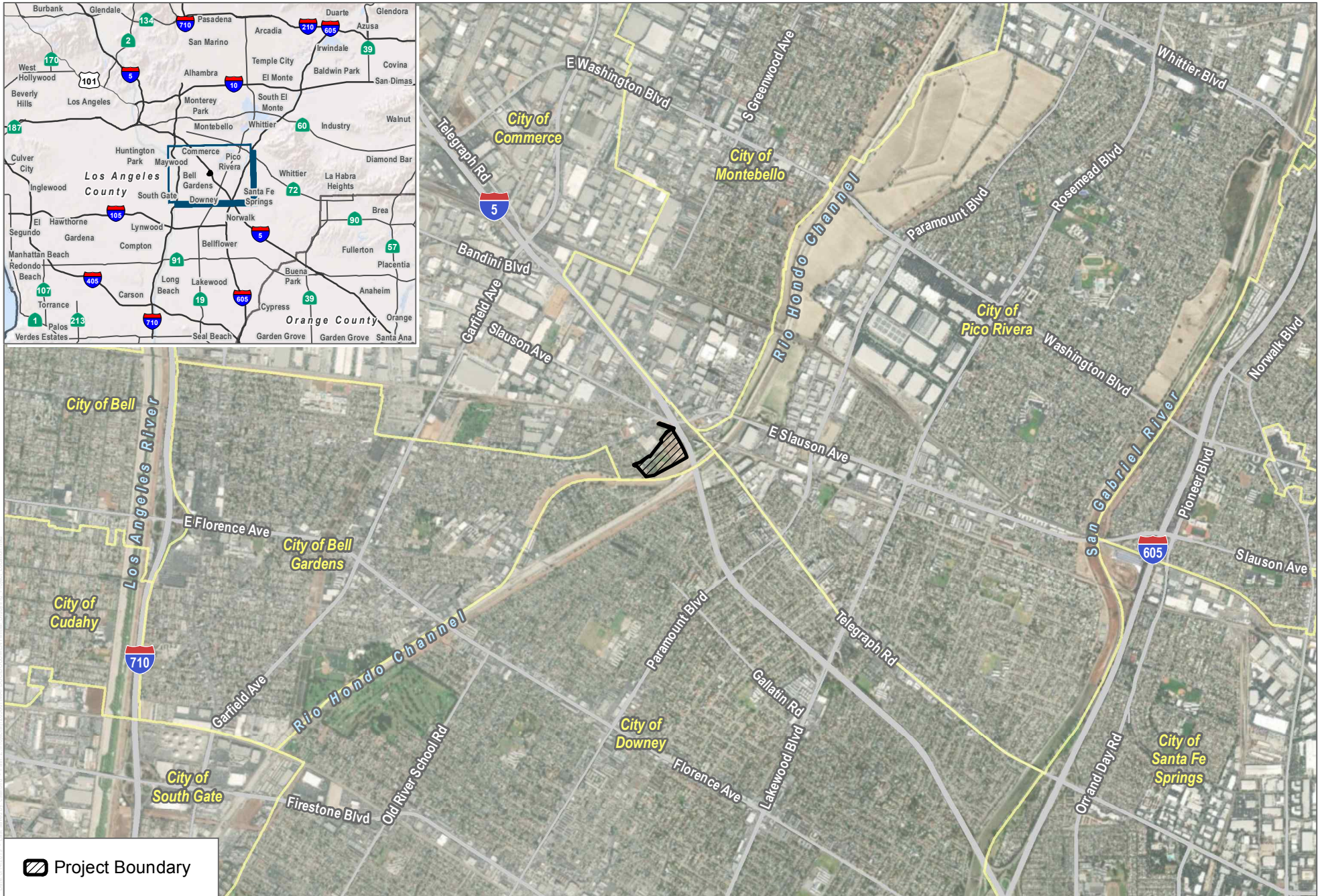
City of Commerce. 2018. City of Commerce Municipal Code Title 19 Zoning. Current through April 24, 2018. [https://library.municode.com/ca/commerce/codes/code\\_of\\_ordinances?nodeId=TIT19ZO](https://library.municode.com/ca/commerce/codes/code_of_ordinances?nodeId=TIT19ZO).

Comstock. 2019. “Draft Project Description.” July 19, 2019.

Metro. 2019. “Eastside Transit Corridor Phase 2.” Accessed July 29, 2019. [https://www.metro.net/projects/eastside\\_phase2/](https://www.metro.net/projects/eastside_phase2/).

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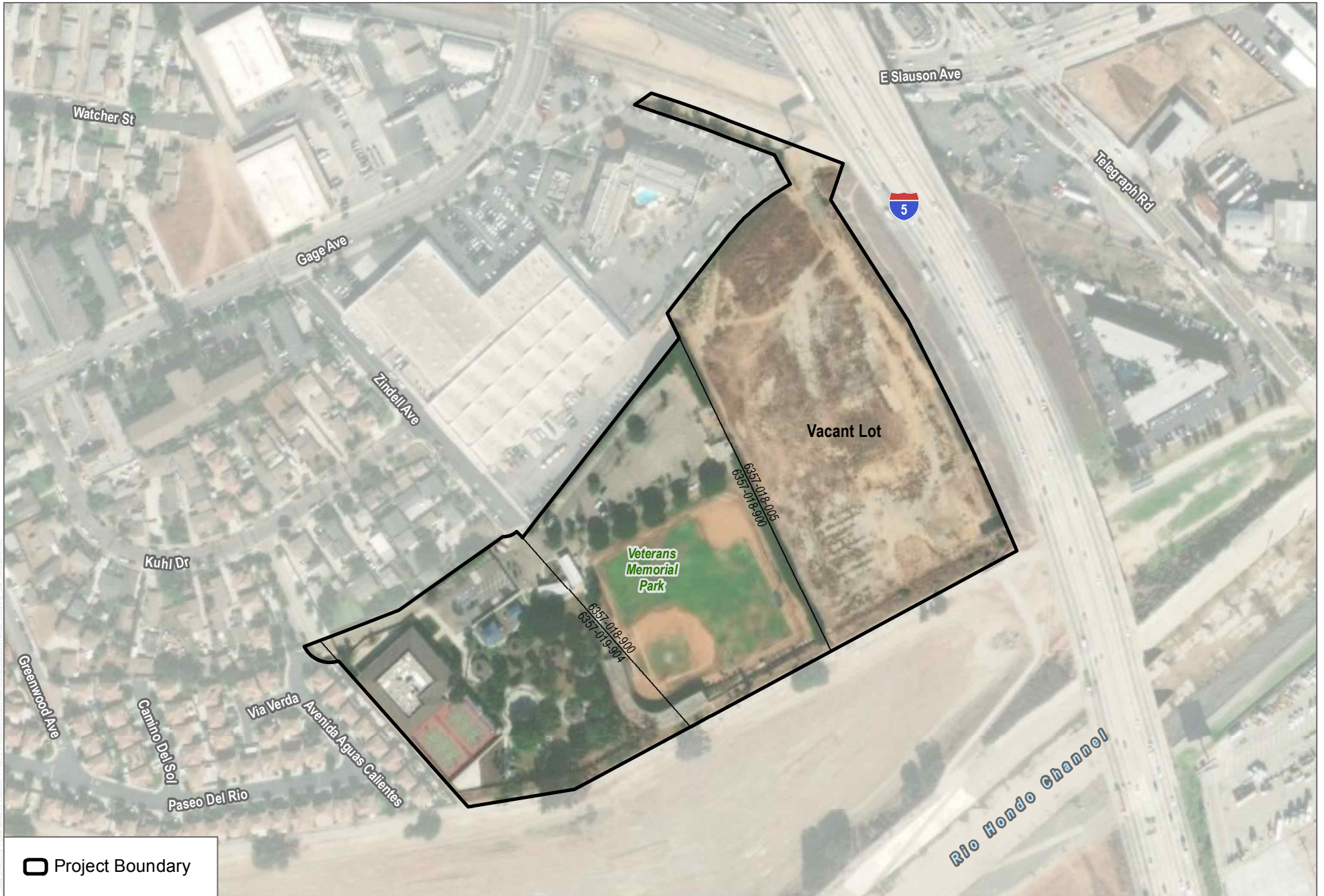
SOURCE: Esri, Digital Globe, Open Street Map

**FIGURE 1**

**Project Location**

Commerce Modelo Initial Study

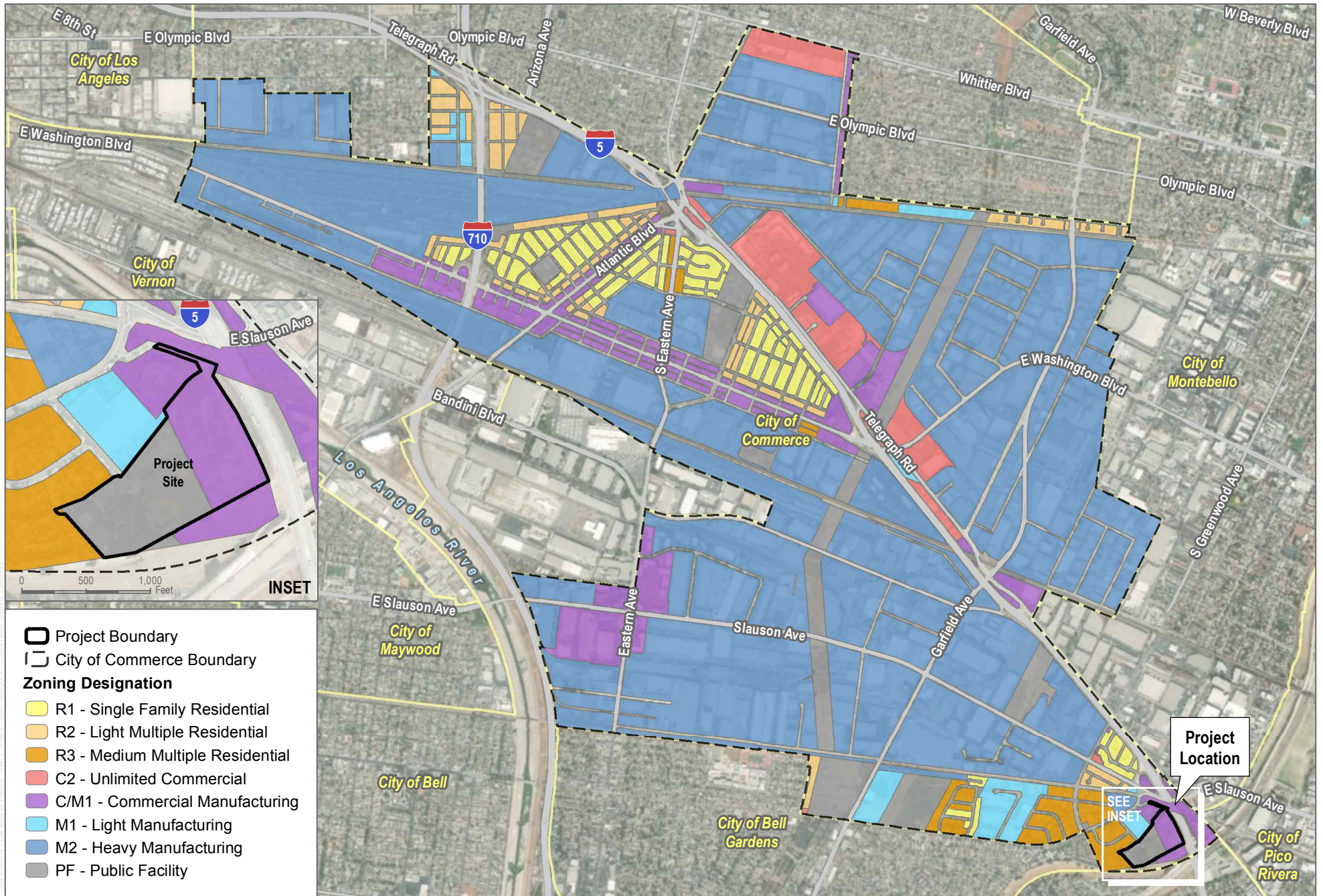
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SOURCE: Esri, Digital Globe, Open Street Map

**FIGURE 2**  
 Existing Site Conditions  
 Commerce Modelo Initial Study

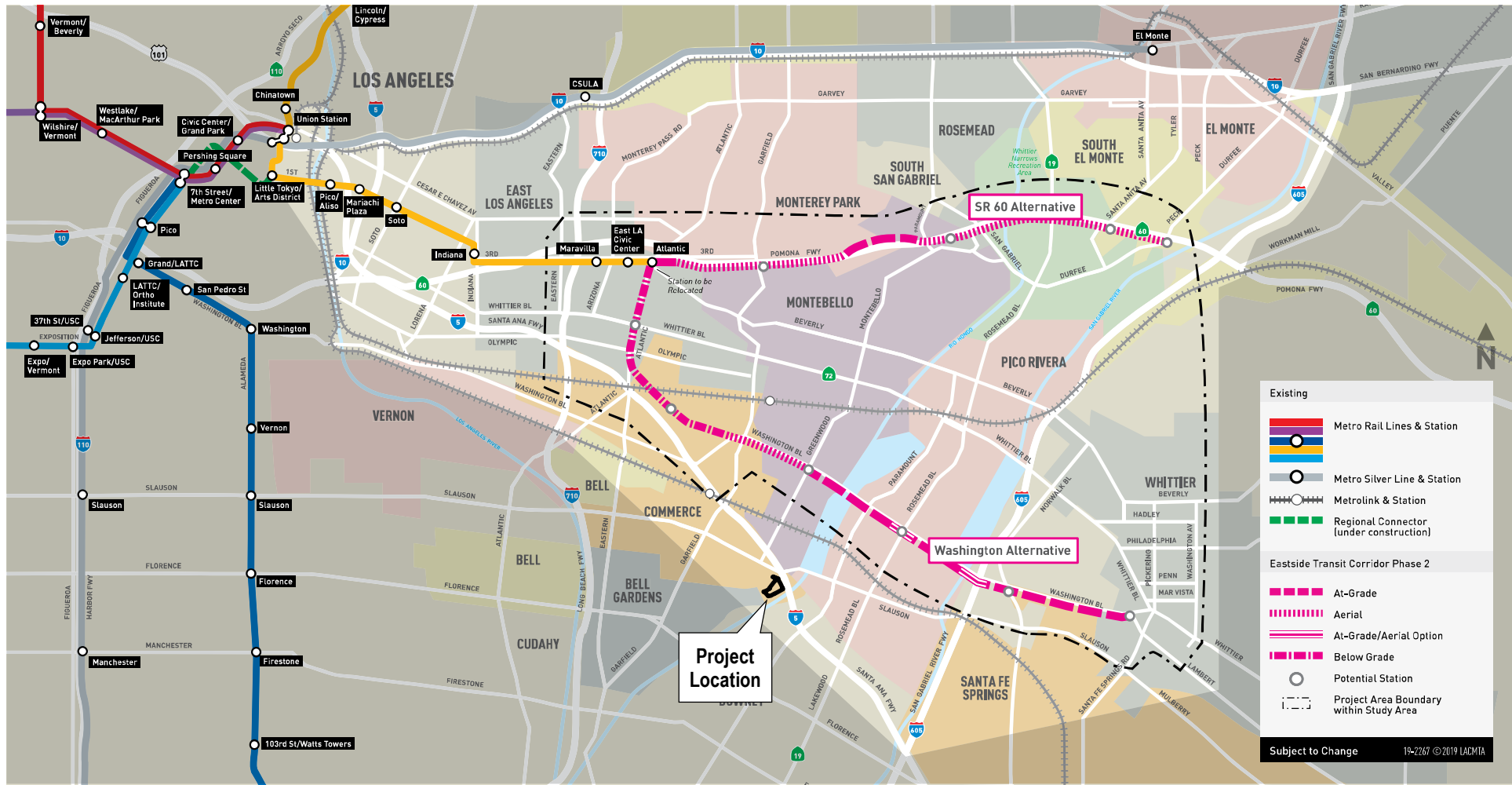
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SOURCE: Esri, Digital Globe, Open Street Map, SCAG 2016

**FIGURE 3**  
**Zoning Map**  
 Commerce Modelo Initial Study

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MAP NOT TO SCALE

SOURCE: METRO 2019

**DUDEK**

**FIGURE 4**

Eastside Transit Corridor Phase 2 Project

Commerce Modelo Initial Study

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SOURCE: Comstock 2019

**DUDEK**

MAP NOT TO SCALE

**FIGURE 5**

**Conceptual Site Plan**

Commerce Modelo Initial Study

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SOURCE: Comstock 2019

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SOURCE: Comstock 2019

**FIGURE 6B**  
Project Rendering Southwest View  
Commerce Modelo Initial Study

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# 3 Initial Study Checklist

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**1. Project title:**

Modelo Project

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

City of Commerce  
Public Works and Development Services Department  
2535 Commerce Way  
Commerce, California 90040

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

Joseph Palombi, 323.722.4805, ext.2389

**4. Project location:**

7316 Gage Avenue and 6364 Zindell Avenue, Commerce, CA 90040

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

Comstock Realty Partners, LLC  
1801 Century Park East, Suite 1095  
Los Angeles, California 90067

**6. General plan designation:**

Veterans Memorial Park: Public Facilities  
Vacant Lot: Commercial Manufacturing

**7. Zoning:**

Veterans Memorial Park: PF  
Vacant Lot: C/M1

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

See Section 2 above.

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

See Section 2 above.

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

See Section 2.6 above.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

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

Yes, see Section 3.18 for details.

**Environmental Factors Potentially Affected**

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

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources          | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology and Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input checked="" type="checkbox"/> Hydrology and Water Quality   | <input checked="" type="checkbox"/> Land Use and Planning    | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                         | <input checked="" type="checkbox"/> Population and Housing   | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Recreation                    | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

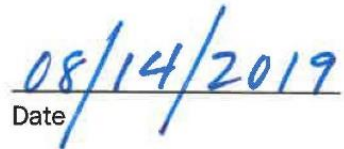


**Determination (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

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

  
Signature

  
Date

## Evaluation of Environmental Impacts

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

### 3.1 Aesthetics

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

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

**Less Than Significant Impact.** The City’s General Plan does not identify any designated scenic vistas (City of Commerce 2008). The viewshed experienced from public areas in the vicinity of the Project site is dominated by views of commercial and residential development, and the I-5 freeway. The Project area is largely built out and lacks any notable topographical features in the vicinity. While the Rio Hondo River and Path are located south of the Project site, views of the Rio Hondo River and Path from the adjacent neighborhood are currently screened by the Project site. Other topographical features in the broader Project area include the Montebello Hills located 5 miles to the northeast, the Puente Hills located 6 miles to the east, and the San Gabriel Mountains located 16 miles to the northeast. However, given the distance and relatively flat topography of the Project area, public views of these resources are obstructed from many vantage points by existing topography, trees, and multi-story buildings. Additionally, given the height of the proposed buildings relative to the heights of existing buildings within the City, the Project would not alter views from hillsides or mountain ranges looking towards the Project site. Thus, the Project would not impact distant views.

The Project site and immediately surrounding area is highly urbanized. A portion of the Project site is developed with the Veterans Memorial Park, and the undeveloped parcel to the east was previously occupied by an industrial structure, which has been demolished. As a result, there are no natural features within the Project site and the Project would not adversely affect a scenic vista. Preservation of public views

is encouraged by the Project, and the enhancement of views through the incorporation of connection between the surrounding residential community and the Rio Hondo River and Path. Therefore, impacts associated with substantial adverse effects on a scenic vista would be **less than significant**, and this issue will not be further discussed in the EIR.

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

**No Impact.** The Project site is in a predominately urbanized area that does not contain scenic resources, such as trees and rock outcroppings. The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2011). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 17 miles northwest of the Project site. Due to this distance, the proposed Project site is not within the viewshed of this State Scenic Highway. Therefore, **no impact** on scenic resources within a state scenic highway would occur as a result of implementing the Project, and this issue will not be further discussed in the EIR.

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

**Potentially Significant Impact.** The Project site is located immediately west of the I-5 freeway, south of Zindell Avenue, and east of a single-family residential neighborhood located west of Avenida Aguascalientes, and north of the Rio Hondo River and Path. As such, the Project site is located in an urbanized area. The Veterans Memorial Park is zoned PF and the vacant lot is zoned C/M1. The proposed Project is requesting a General Plan Amendment and Zone Change to change the land use designation and zoning of the Veterans Memorial Park parcel from PF to Specific Plan. The proposed development would represent a change in visual character at the Project site, and the increased height of the proposed Project relative to existing structures on the Project site would generate new levels of shade and shadow in the project vicinity, which could affect shading experienced by surrounding development. Therefore, the Project could conflict with applicable zoning requirements and other regulations governing scenic quality. This issue is **potentially significant** and will be further discussed in the EIR.

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

**Potentially Significant Impact.** Currently there are numerous sources of nighttime lighting in the surrounding areas, including nighttime lighting from the existing commercial, single-family and multi-family residential properties north and west of the Project site; and nighttime automobile lights from the I-5 freeway. Project construction could introduce light and glare during short-term construction activities. However, Project construction would occur eight hours a day, five days a week, in compliance with the City's Noise Ordinance, and any lighting from construction activities would cease upon construction completion. The Project would have light sources associated with urban areas, such as indoor lighting emanating from building interiors through windows. The proposed lighting would be directed, oriented, and shielded to prevent light from shining onto the nearby residences in accordance with Section 19.19.130, Light and Glare of the City's Municipal Code (City of Commerce 2018). Despite the Project site being in an urban setting with existing

sources of light and glare, implementation of the Project could create new sources of light or glare within the Project area. Therefore, impacts are considered **potentially significant** and this issue will be further discussed in the EIR.

**References**

Caltrans (California Department of Transportation). 2011. Caltrans Officially Designated Scenic Highways. Accessed June 10, 2019: [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/langeles.htm](http://www.dot.ca.gov/hq/LandArch/scenic_highways/langeles.htm).

City of Commerce. 2008. *City of Commerce 2020 General Plan*. Adopted January 2008. <http://www.ci.commerce.ca.us/DocumentCenter/Home/View/152>.

City of Commerce. 2018. City of Commerce Municipal Code Title 19 Zoning. Current through April 24, 2018. [https://library.municode.com/ca/commerce/codes/code\\_of\\_ordinances?nodeId=TIT19ZO\\_CH19.19SIPL\\_GEDEST\\_19.19.130LIGL](https://library.municode.com/ca/commerce/codes/code_of_ordinances?nodeId=TIT19ZO_CH19.19SIPL_GEDEST_19.19.130LIGL).

### 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The Project site and surrounding areas are characterized by features typical of an urban landscape. As shown on the Los Angeles County Important Farmland map, the Project site does not include any sites mapped by the Farmland Mapping and Monitoring Program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (FMMP 2017). Implementation of the proposed Project would not involve changes that could result in conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist on the Project site or in proximity to the Project site. Furthermore, the Project site is already graded and highly disturbed. Therefore, the Project would not convert Farmland to non-agricultural uses, and **no impact** would occur as a result of the Project. This issue will not be further analyzed in the EIR.

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

**No Impact.** The Veterans Memorial Park is zoned PF and the vacant lot is zoned C/M1 (City of Commerce 2015). The PF zone includes municipal and other government buildings, public educational facilities, religious facilities, and recreational areas, and the C/M-1 zone includes commercial and industrial uses. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist on the Project site or in the vicinity of the Project site (California Department of Conservation 2016). For these reasons, implementation of the Project would not conflict with existing zoning for agricultural use, as none exist in the area, nor would it conflict with a Williamson Act contract, as none exist in the area. **No impact** to Williamson Act contract lands or land zoned for agricultural uses would occur as a result of the Project, and this issue will not be further analyzed in the EIR.

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

**No Impact.** The City’s General Plan Land Use Map designates the Veterans Memorial Park as Public Facilities and the vacant lot as Commercial Manufacturing (City of Commerce 2009). The corresponding zoning for these land uses are PF and C/M-1, respectively. The list of allowable land uses contained in the City’s Zoning Ordinance for PF and C/M-1 zones does not include any timberland or forest land uses (City of Commerce 2018). No forest land, timberland, or Timberland Production areas are located within or

adjacent to the Project site. Therefore, the Project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Project would be implemented on a developed parcel, and previously developed parcel that is surrounded by developed areas. **No impact** to forest land or timberland would occur as a result of the Project, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As characterized above, no forest land is located within the Project site or in the vicinity of the Project site, as the area is urbanized and developed with commercial and residential uses. No forest land would be converted or otherwise affected by the Project, and **no impact** would occur as a result of the Project, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As characterized above, no farmland or forest land is located in the Project site or within the vicinity of the Project site, as the area is urbanized and developed with commercial and residential uses. No farmland or forest land would be converted or otherwise affected by the Project, and **no impact** would occur as a result of the Project. This issue will not be further analyzed in the EIR.

**References**

California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed August 3, 2019, 2019. [http://www.conservation.ca.gov/dlrp/wa/Pages/stats\\_reports.aspx](http://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx).

City of Commerce. 2009. "Land Use Map." Printed August 6, 2009. <http://www.ci.commerce.ca.us/DocumentCenter/Home/View/349>.

City of Commerce. 2015. "Zoning Map." Revision December 29, 2015. <http://www.ci.commerce.ca.us/DocumentCenter/View/4486><http://www.ci.commerce.ca.us/DocumentCenter/View/4486>.

City of Commerce. 2018. City of Commerce Municipal Code Title 19 Zoning. Current through April 24, 2018. [https://library.municode.com/ca/commerce/codes/code\\_of\\_ordinances?nodeId=TIT19ZO](https://library.municode.com/ca/commerce/codes/code_of_ordinances?nodeId=TIT19ZO).

FMMP (Farmland Mapping and Monitoring Program). 2017. *Los Angeles County Important Farmland 2016*. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. July 2017. Accessed August 3, 2019. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>.

### 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** A significant impact may occur if the Project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The Project site is within the South Coast Air Basin (SCAB), and the applicable plan is the Air Quality Management Plan prepared by the South Coast Air Quality Management District (SCAQMD). Construction and operation of the Project could result in an increase in emissions by increasing the intensity of development at the Project site, which could conflict with the Air Quality Management Plan. As such, impacts are considered **potentially significant** and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Construction emissions associated with development of the proposed mixed-use development would temporarily emit pollutants to the local airshed from dust and on-site equipment, construction worker vehicles, delivery trucks, and off-site haul trucks. Volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM<sub>10</sub>), particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), and sulfur oxides (SO<sub>x</sub>) emissions are the main pollutants that would result from construction. Project operation would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating).



The SCAB is designated as a nonattainment area for national and California O<sub>3</sub> and PM<sub>2.5</sub> standards (CARB 2017; EPA 2017). The Project would generate VOC and NO<sub>x</sub> emissions (which are precursors to ozone) and emissions of PM<sub>2.5</sub>. Further analysis will be required to determine the Project’s potential to result in a cumulatively considerable net increase of these criteria pollutants. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** There are sensitive receptors (residences) located immediately north and west of the property line of the Project site. The Project may generate toxic air contaminant emissions during construction of the Project from construction equipment and diesel vehicles. Additionally, the operational emissions associated with the Project could expose sensitive receptors to pollutant concentrations as well. Further analysis is required regarding the air pollutant emissions that would result from the Project, and whether it would be substantial. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Construction and operation of the Project could create objectionable odors. Construction odors may result from diesel equipment and gasoline fumes. During operation, odors may be produced by waste and chemicals used during cleaning and maintenance. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

**References**

CARB (California Air Resources Board). 2017. “Area Designation Maps/State and National.” Last updated October 18, 2017. <https://www.arb.ca.gov/desig/adm/adm.htm>.

EPA (U.S. Environmental Protection Agency). 2017. “EPA Green Book.” Last updated September, 2017. <https://www.epa.gov/green-book>.

### 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

**Potentially Significant Impact.** The City is urbanized and generally lacks suitable habitat for special-status species. The Project site is in a largely developed portion of the City. Under the existing conditions, the Project site supports limited, ornamental landscaping typical of an urban area. The vegetation on site is ornamental in nature and does not include special-status plants. Furthermore, this vegetation would not be expected to serve as suitable habitat for special-status wildlife species. Although a portion of the Project site is currently used for open space as part of the Veterans Memorial Park, this site has been subject to disturbance as a result of the previous landfill and construction of the I-5 freeway. Similarly, the area between the Project site and the Rio Hondo River consists of disturbed, non-native species, which likely does not contain suitable habitat for special-status species. Nonetheless, the presence or non-presence of special-status species within the Project area will be confirmed. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project site has been subject to previous site disturbance as a result of the previous landfill and construction of the I-5 freeway. The Project site supports limited ornamental vegetation consisting of ornamental trees, grasses, and shrubs. Because the vegetation is ornamental in nature and is situated in an urban environment, it does not constitute a sensitive natural community in and of itself. Nonetheless, to determine the proposed Project's potential to adversely affect a riparian or other sensitive natural community, a biological site assessment would be conducted. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project site does not support any wetland areas. Based on a review of the USFWS National Wetlands Inventory, the Project site does not contain any blue-line streams or wetland habitats (USFWS 2019b). The Rio Hondo River is located to the south of the Project site. Additionally, the between Project site and the Rio Hondo River is a 16.26-acre Freshwater Pond habitat. Although the Project would not result in direct removal, filling, hydrological interruption, or other means of impact to the Rio Hondo River, further analysis is required to determine the proposed Project's potential off-site impacts. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project site is located within a developed, urbanized area. There are no wetlands or running waters within the Project site, and therefore, the Project would have no potential to affect the movement of migratory fish. However, the Project site contains trees that would have the potential to provide nesting areas for migratory or nesting birds. The EIR will further examine impacts to migratory wildlife (namely, nesting birds). Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The City has an adopted Tree Policy that provides guidelines for the protection and preservation of trees planted within the City's rights-of-way and at City facilities (Municipal Code Section 12.06, City Trees). The Project considers the removal of trees within Veterans Memorial Park, an existing City facility. As such, further analysis is required to determine the Project's ability to conflict with local policies protecting biological resources. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**No Impact.** According to the USFWS’s Habitat Conservation Plan (HCP)/Natural Community Conservation Plan (NCCP) Planning Areas identified in the Southern California Map and the California Regional Conservation Plans Map, the Project site is neither located within a NCCP nor a HCP (CDFW 2018). As such, there would be **no impact**. This issue will not be analyzed further in the EIR.

**References**

CDFW (California Department of Fish and Wildlife). 2018. California Regional Conservations Plans Map. Accessed August 5, 2019. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>.

USFWS (United States Fish and Wildlife Service). 2019. National Wetlands Inventory, *Wetlands Mapper*. Accessed August 5, 2019. <http://www.fws.gov/wetlands/Data/Mapper.html>.

### 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES</b> - Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The Veterans Memorial Park was originally constructed between 1965 and 1970. While elements of the original Veterans Memorial Park are still intact, several improvements have been made over the years. Additionally, the existing community center has been shuttered due to structural and safety issues, and temporary trailers are used in lieu of the community center. For this reason, the Veterans Memorial Park no longer retains requisite integrity and does not appear eligible under California Register of Historical Resources (CRHR) Criterion 3 for architectural associations. However, given the existing structures are at least 45 years of age, these will be further evaluated in the EIR to determine whether they are considered historical resources under CEQA. The results of the evaluation will determine if the Project has the potential to significantly impact historical resources under CEQA. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project site is located within an urbanized area and has been subject to disturbance in the past as a result of the former landfill operations. Any archaeological resources on the Project site have likely been previously disturbed. However, ground-disturbing activities associated with construction of the Project, such as excavation of the subterranean parking garage and grading of the site during site preparation, has the potential to damage or destroy intact subsurface archeological deposits that may be present below the ground surface. The EIR will, therefore, discuss the potential for such resources to be impacted by the Project and will identify mitigation measures to reduce any impacts of the proposed Project on any archeological resources that may be present. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As previously discussed, the Project site is located within an urbanized area and has been subject to disturbance in the past as a result of the former landfill operations. The Project site is not part of a formal cemetery, and therefore, it is unlikely that human remains exist on, or in the vicinity of, the Project site. No known burial sites have been identified within the Project site or in the vicinity. Although it is unlikely, previously undiscovered human remains could be located within the Project site and could be disturbed by construction activities. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

### 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy – Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Construction of the Project would require the use of energy in the form of fossil fuels (for construction equipment, worker vehicles, and truck trips) and electricity (for construction site lighting, computer equipment, and temporary construction trailers, if needed). Operation of the Project would require electricity for building operation (appliances, lighting, etc.), natural gas for building heating

and cooling, and fossil fuels related to vehicular transportation to and from the Project site. Further analysis is required to quantify the total anticipated energy use and to determine the potential environmental impacts resulting from the consumption of energy resources. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project is subject to various regional and local plans guiding energy use. The Project is required to be consistent with existing regulations and, therefore, is not anticipated to conflict with renewable energy or energy efficiency plans. However, the EIR will include a more robust discussion of applicable plans and will provide a consistency analysis for the Project, to ensure that the project would comply with such plans. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

### 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS</b> – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

**Potentially Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act regulates development near active faults to reduce hazards associated with surface fault rupture. The Act prohibits the location of most structures for human occupancy across the trace of active faults and establishes special study zones called Alquist-Priolo Zones, which extend 500 feet from the fault. These zones are delineated and defined by the state geologist and identify areas where potential surface rupture along a fault could prove hazardous. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone (CGS 1989; CGS 1999). Additionally, review of the *Fault Activity Map of California* indicates that there are also no faults crossing or adjacent to the Project site (CGS 2010). As such, the proposed Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault. However, the Project site is located approximately 4.5 miles southwest of the East Montebello Fault and 5 miles west of the Whittier Fault. Based on the relative distance between the Project site and these faults, the Project could exacerbate existing environmental conditions, which could expose people or structures to substantial adverse effects involving rupture of an earthquake fault. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

ii) **Strong seismic ground shaking?**

**Potentially Significant Impact.** As with many areas of Southern California, the Project site is within a seismically active area. The Project could be subject to seismic ground shaking from a variety of fault lines throughout the region. A number of faults in the region are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the Project site. Although the Project could be subject to severe seismic shaking, construction and operation of the Project would not increase or exacerbate the potential for earthquakes to occur, and therefore, would not directly or indirectly cause potential substantial adverse effects involving seismically induced ground shaking. Nevertheless, due to the project's location in a seismically active region, impacts are considered **potentially significant**. This issue will be further discussed in the EIR.

*iii) Seismic-related ground failure, including liquefaction?*

**Potentially Significant Impact.** Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like a liquid. The Project site is identified as being susceptible to liquefaction (CGS 1989; CGS 1999). In the event of liquefaction at the Project site, hazardous geotechnical conditions could result. Although the Project site could be subject to liquefaction, Project construction and operation is not anticipated to increase or exacerbate the potential for liquefaction to occur, and therefore, would not directly or indirectly cause potential substantial adverse effects involving seismically related ground failure, including liquefaction. Excavation of the subterranean levels may in fact remove liquefiable soils from the Project site. Nevertheless, due to the Project site's potential susceptibility to seismic-related ground failure, impacts are considered **potentially significant**. This issue will be further analyzed in the EIR.

*iv) Landslides?*

**No Impact.** The geologic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside all contribute to the potential for slope failure and landslide events. In order to fail, unstable slopes need to be disturbed; common triggering mechanisms of slope failure include undercutting slopes by erosion or grading, saturation of marginally stable slopes by rainfall or irrigation, and shaking of marginally stable slopes during earthquakes. The likelihood of a landslide is low due to the relatively flat topography at the site. Additionally, there are no significant hillsides or unstable slopes within the vicinity of the Project site. As such, landslides are unlikely to occur on the Project site and would not expose people or structures to adverse risks associated with landslides. **No impact** would occur, and this issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** Temporary erosion could occur during Project construction. However, the Project Applicant or its construction contractor would be required to comply with all applicable standard regulations, including SCAQMD Rules 402 and 403, which would reduce construction erosion impacts. Additionally, because the Project would disturb more than one or more acres, the proposed Project must adhere to the provisions of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The Construction General Permit requires implementation of a Stormwater Pollution Prevention Plan (SWPPP), which would include Project construction features best management practices (BMPs) designed to prevent erosion and protect the quality of stormwater runoff. However, in order for the design and construction of the Project to account for site-specific erosion potential, analysis of the results of site-specific geologic reports is required. Therefore, impacts are considered **potentially significant**, and this issue will be further discussed in the EIR.



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

**Potentially Significant Impact.** Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas or as a result of decomposition of natural organic materials. Soils that are particularly subject to subsidence include those with high silt or clay content and/or high organic content.

As previously discussed, the Project site is not located within an area susceptible to earthquake-induced landslides; however, a portion of the Project site is identified as being susceptible to liquefaction (CGS 1989; CGS 1999. Additionally, the Project site is underlain a former landfill and it is unknown if underlying soils have the potential for lateral spreading or subsidence. Further laboratory testing and engineering analysis is required to confirm site-specific conditions and inform engineering specifications for soils and building foundations. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

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

**Potentially Significant Impact.** Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. The Project would be required to comply with California Building Code requirements related to hazards involving potentially expansive soils. However, the Project site is overlain a landfill and it is unknown if the soils are prone to expansion. Further laboratory testing and engineering analysis is required to confirm site-specific conditions and inform engineering specifications for soils and building foundations. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

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

**No Impact.** The Project site is served by the existing municipal sewer system. The City has established utility services, and no septic systems are required to serve the Project. Therefore, **no impact** would occur, and this issue will not be further analyzed in the EIR.

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

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

**References**

CGS (California Geologic Survey). 1989. *Earthquake Zones of Required Investigation – South Gate Quadrangle*. Earthquake Fault Zones Released March 25, 1989. <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>.

CGS. 1999. *Earthquake Zones of Required Investigation – Whittier Quadrangle*. Earthquake Fault Zones Released March 25, 1999. [http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/WHITTIER\\_EZRIM.pdf](http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/WHITTIER_EZRIM.pdf).

CGS. 2010. *Fault Activity Map of California (2010)*. Updated 2010. Accessed August 5, 2019. <http://maps.conservation.ca.gov/cgs/fam/>.

### 3.8 Greenhouse Gas Emissions

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

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

**Potentially Significant Impact.** The Project would result in emissions of greenhouse gases (GHGs) during construction and operation. Temporary GHG emissions would result from construction vehicles and equipment. Additionally, during operation, GHG emissions would result from vehicle trips generated by the Project, as well as building energy and water usage. Further analysis is required to determine the estimated Project-generated GHG emissions and their impact on global climate change. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** There are several federal and state regulatory measures aimed at identifying and reducing GHG emissions, most of which focus on area-source emissions (e.g., energy use) and changes to the vehicle fleet (hybrid, electric, and more fuel-efficient vehicles). The Global Warming Solutions Act (Assembly Bill [AB] 32) prepared a scoping plan and its first update, which established regulations to reduce California GHG emission levels to 431 million metric tons of carbon dioxide equivalent per year. In addition, SB 32 establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum

technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.<sup>1</sup> Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others (CARB 2014). CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and Executive Order S-3-05. This is confirmed in the Second Update, which states (CARB 2017):

The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

The Project would comply with regulations established by AB 32 and SB 32. However, further investigation is required to determine the estimated Project-generated GHG emissions and their relationship to AB 32, SB 32, and other applicable plans and policies. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

## References

- CARB (California Air Resources Board). 2014. *First Update to the Climate Change Scoping Plan: Building on the Framework Pursuant to AB 32, the California Global Warming Solutions Act of 2006*. May 2014. Accessed November 20, 2017. [http://www.arb.ca.gov/cc/scopingplan/2013\\_update/first\\_update\\_climate\\_change\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf).
- CARB. 2017. *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy For Achieving California's 2030 Greenhouse Gas Target*. [https://ww3.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://ww3.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf).

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<sup>1</sup> The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

### 3.9 Hazards and Hazardous Materials

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

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

**Potentially Significant Impact.** Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during demolition and construction activities associated with the Project. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. However, the Project involves the demolition of existing buildings, which could

create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Furthermore, other hazardous materials could be released during excavation and grading activities associated with the past use of the landfill. Therefore, impacts are considered **potentially significant**, and as such, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Construction activities on the Project site would involve the use and storage of commonly used hazardous materials such as gasoline, diesel fuel, lubricating oil, grease, solvents, and other vehicle and equipment maintenance fluids. These substances would be used and stored in designated construction staging areas within the Project area. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. However, the Project involves the demolition of existing buildings, which could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material. Furthermore, other hazardous materials could be released during excavation and grading activities associated with the past use of the landfill. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The nearest school to the Project site is Ellen Ochoa Prep School (9<sup>th</sup> through 12<sup>th</sup> grade), located approximately 0.6 mile east of the Project site. As stated previously, the Project could potentially result in the accidental release of hazardous materials into the environment. As such, further evaluation is required to determine the Project's potential to emit hazardous emissions within one-quarter mile of a school. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

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

**Potentially Significant Impact.** The Project site may be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The parcels comprising the Project site were previously part of a construction borrow-pit type of landfill created for, and during, the construction of the I-5 freeway. As such, there may be hazardous materials underlain the Project site and a site-specific hazardous materials site search would be required to determine whether the Project would create a significance hazard to the public or the environment. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**No Impact.** The nearest public airports to the Project site include the Compton/Woodley Airport approximately 8.6 miles southwest of the Project site, and the San Gabriel Airport approximately 9 miles

northeast of the Project site. According to the County's GIS Viewer, the Project site is located outside of the airport land use plan for both the Compton/Woodley Airport and the San Gabriel Airport (County of Los Angeles Planning 2019). As such, the Project site is not within an airport land use plan or within two miles of a public airport, and as such, the Project would not result in a safety hazard or excessive airport-related noise. **No impact** would occur, and this issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The City's General Plan Safety Element has adopted Health and Safety goals and policies related to emergency response (City of Commerce 2008). Additionally, the City's Emergency Preparedness Division coordinates the City's response at the City's Emergency Operation Center facility. The facility serves as the headquarters to first responders in an emergency (City of Commerce 2019).

Prior to construction of the Project, the proposed site plans would be required to undergo review by the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The Project would also be required to comply with all applicable codes and ordinances for emergency access. As such, the Project would provide for emergency access and would not interfere with an adopted emergency response plan or emergency evacuation plan. Adherence to these requirements would reduce potential impacts related to emergency plans to a **less-than-significant** level for the Project. This issue will not be further analyzed in the EIR.

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

**No Impact.** According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zones maps, the entire City of Commerce and the Project site is neither moderately, highly, or very highly susceptible to wildland fire (CAL FIRE 2019). As such, implementation of the proposed Project is not likely to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, **no impact** would occur, and this issue will not be further analyzed in the EIR.

## References

CAL FIRE. 2019. "FHSZ Viewer." Accessed August 6, 2019. <http://egis.fire.ca.gov/FHSZ/>.

City of Commerce. 2008. *City of Commerce 2020 General Plan*. Adopted January 2008. <http://www.ci.commerce.ca.us/DocumentCenter/Home/View/152>.

City of Commerce. 2019. "Emergency Preparedness Office." Accessed August 6, 2019. <http://www.ci.commerce.ca.us/index.aspx?nid=106>.

County of Los Angeles Planning. 2019. "GIS Interactive Map (A-Net)." Accessed August 6, 2019. <http://planning.lacounty.gov/assets/obj/onet/Main.html>.

### 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Because construction of the Project would require land disturbance of greater than one acre, the Project would be required to prepare and implement a SWPPP in accordance with the Statewide Construction General Permit (State Water Resources Control Board Order 2009-0009-DWQ, as amended). This requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met, and that stormwater runoff from the construction work areas do not cause

degradation of water quality in receiving water bodies (in this case the regional storm drain system). Some of these BMPs include appropriate handling and disposal of contaminants, fertilizer and pesticide application restrictions, litter control and pick up, and vehicle and equipment repair and maintenance in designated areas. In addition, a draft Water Quality Management Plan (WQMP) would be prepared for the proposed Project (and would be finalized concurrently with the preparation of final project design) that demonstrates how the Project would comply with all applicable water quality standards and discharge requirements of the City of Commerce and the provisions of the NPDES. The WQMP is designed to show how a project would minimize impervious surfaces, retain or treat stormwater runoff from the site, and implement Low Impact Development (LID) designs in a manner that collectively matches the rate and volume of runoff to existing conditions. The WQMP addresses long-term effects on water quality within the basin and ensure BMPs and LID designs minimize potential water quality concerns to the maximum extent practicable. However, further analysis is required to determine whether water quality standards or waste discharge requirements could be violated by operation of the Project. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The California Water Service Company provides residential, commercial, and industrial water services to the City. The City is within the East Los Angeles (ELA) District of the California Water Service Company. The water supply for the ELA District is provided by a combination of imported purchased water and groundwater from the Central Basin’s Lynwood and Silverado aquifers (California Water Service 2016).

The park and open space, residential, and commercial uses associated with the Project would generate water demand, which could substantially decrease water supplies. Further investigation is required to determine estimated water demands associated with the Project. Therefore, impacts to groundwater supplies are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**i) *result in substantial erosion or siltation on or off site;***

**Potentially Significant Impact.** The Project would increase the amount of impervious surface on the Project site, which could substantially alter the drainage pattern of the Project site and may result in substantial erosion or siltation on- or off- site. A SWPPP would be prepared that would include measures to prevent substantial erosion or siltation during construction activities. However, further analysis is required to determine the impacts associated with operation of the Project. Impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

**ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***

**Potentially Significant Impact.** There are no natural surface water features present on-site that could be altered as a result of the Project. The Project would increase the amount of impervious area of the Project site, which could increase the rate or amount of surface runoff. Although compliance with the stormwater



management requirements of the SWPPP would reduce the Project's ability to result in substantial flooding on or off site, further analysis is required to determine the impacts associated with operation of the Project. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

*iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

**Potentially Significant Impact.** The Project would increase the amount of impervious areas on the Project site, which could increase the amount of runoff entering the existing stormwater drainage system. As such, further analysis is required to determine the amount of runoff generated by the Project, and if the Project could be adequately served by the existing capacity of the stormwater drainage system. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

*iv) impede or redirect flood flows?*

**Potentially Significant Impact.** The Project site does not contain any streams or rivers having the potential to be altered by the Project. However, the Project site is located adjacent to a Flood Hazard Zone and the Rio Hondo River (FEMA 2008). As such, the Project could impede or redirect flood flows. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

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

**Potentially Significant Impact.** Due to the distance between the Project site and the Pacific Ocean, the Project site would not be exposed to inundation by a tsunami. A seiche, or standing wave, typically occurs in partially or fully enclosed bodies of water such as lakes, reservoirs, or bays, often resulting from seismic disturbance. The Project site is not located within close proximity of a body of water that would likely produce a seiche hazard. As previously mentioned, the Project site is located adjacent to a Flood Hazard Zone and the Rio Hondo River (FEMA 2008). Due to the Project's proximity to a flood hazard zone, the Project could release pollutants due to Project inundation. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

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

**Potentially Significant Impact.** Water to be consumed by the Project uses would be provided by the California Water Service Company, which sources some of its water supply from groundwater. The Project would increase demand for potable water supplies. The EIR will quantify the Project's anticipated water demand and will address whether the California Water Service Company would be able to accommodate the water demand of the Project, as well as whether the additional water demand would affect groundwater supplies. Additionally, the Project would increase the imperviousness of the Project site, which could decrease groundwater recharge levels such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, the Project could interfere with groundwater recharge. Therefore, impacts are considered **potentially significant**, and this issue will be analyzed further in the EIR.

## References

California Water Service. 2016. 2015 Urban Water Management Plan East Los Angeles District. June 2016.  
[https://www.calwater.com/docs/uwmp2015/ela/2015\\_Urban\\_Water\\_Management\\_Plan\\_Final\\_\(ELA\).pdf](https://www.calwater.com/docs/uwmp2015/ela/2015_Urban_Water_Management_Plan_Final_(ELA).pdf).

FEMA (Federal Emergency Management Agency). 2008. Firm Panel No. 06037C1810F. Effective September 26, 2008. Accessed August 6, 2019. <https://msc.fema.gov/portal/search>.

### 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING</b> – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project physically divide an established community?***

**No Impact.** Implementation of the Project would not physically divide an established community. The Project site consist of the Veterans Memorial Park and a vacant parcel, formerly occupied by an industrial building. The Project site is bordered by residential uses to the north and west, the Rio Hondo River and Path to the south, and the I-5 freeway to the east. While there are residential neighborhoods in the vicinity of the Project area, the Project site does not contain any neighborhoods that would be removed or divided as a result of the proposed Project. The Project includes the demolition of existing buildings and the construction of a new mixed-use development including park and open space, residential, and commercial uses. No new through streets are proposed and all Project development would be located within the Project site. Therefore, the Project would not divide an established community, and **no impact** would occur. This issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project would require a General Plan Amendment, and Specific Plan/Zone Change as discretionary approvals. Although it is unlikely that the Project would result in a conflict with applicable land use plans, policies, or regulations, further analysis is required. Impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

### 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal, or other known wells within the Project area (DOGGR 2019). The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the majority of the Project site as Mineral Resources Zone 3. Mineral Resources Zone 3 is a designation given to areas containing mineral deposits of which the significance cannot be determined (Division of Mines and Geology 1982). Because the Project site is not mapped as or known to contain an important mineral resource, the Project would not have the potential to cause a loss in availability of a known mineral resource that would be of value to the region and the residents of the state. The Project site is developed with existing Veterans Memorial Park and a vacant parcel, which was formerly occupied by an industrial building. As such, the Project site does not support mineral extraction activities, nor would it be expected to support such activities in the future. As such, **no impact** would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** The City’s General Plan does not designate mineral resource zones within the City. Furthermore, as discussed in Section 3.12(a), no active oil wells exist within the Project area. The Project site is developed with the existing Veterans Memorial Park and a vacant parcel, which was formerly occupied by an industrial building. As such, the Project site does not support mineral extraction activities, nor would it be expected to support such activities in the future. Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site. **No impact** would occur, and this issue will not be further analyzed in the EIR.

**References**

Division of Mines and Geology. 1982. *Generalized Aggregate Resource Classification*. [map]. Prepared 1982. Accessed August 6, 2019. [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_143/PartIV/Plate\\_4-17.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/Plate_4-17.pdf).

DOGGR (California Department of Conservation, Division of Oil, Gas, and Geothermal Resources). 2019. DOGGR Well Finder. Accessed August 6, 2019. <http://maps.conservation.ca.gov/doggr/index.html#close>.

### 3.13 Noise

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

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

**Potentially Significant Impact.** Implementation of the Project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction and long-term noise during proposed future on-site land uses. Residential uses are located to the north and west, which could be impacted by noise from Project construction and operation, as well as existing and Project-related traffic.

The City’s Municipal Code Section 19.19.160- Noise describes the noise standards that are applicable to the various types of zoning. According to this section in the Commerce Municipal Code, the maximum permitted noise levels for residentially zoned properties are 55 dBA from 7:00 AM to 7:00 PM; 50 dBA from 7:00 PM to 10:00 PM; and 45 dBA from 10:00 PM to 7:00 AM. The maximum permitted noise levels for commercial zoned properties are 65 dBA from 7:00 AM to 10:00 PM and 55 dBA from 10:00 PM to 7:00 AM.

Construction activities associated with the Project would be temporary in nature and related noise impacts would be short-term. In regards to operational noise, the Project would be required to comply with the noise standards set in Section 19.19.060 for commercial zoned properties. Operations of the Project may be periodically audible at adjacent uses. Noise sources that are typical of commercial and residential land

uses include heating systems, trash hauling, vehicles entering/exiting the site including loading/delivery trucks, and outside conversation from guests and visitors. In addition, the Project would have outdoor public and common space, which would increase noise from outdoor conversations or other sources of outdoor noise. The Project would be required to comply with applicable regulations of the City's Municipal Code. Nonetheless, the Project would generate an increase in noise at the site, compared to the existing conditions. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Operation of certain types of construction equipment can cause vibrations that spread through the ground and diminish in strength with distance. There are a variety of vibration-sensitive receptors within the vicinity of the Project site, including residential uses to the north and west. The EIR will quantify the anticipated vibration that could be produced by the Project and will evaluate potential impacts to nearby sensitive receptors. Therefore, impacts are considered **potentially significant**, and this issue be further analyzed in the EIR.

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

**No Impact.** The nearest public airports to the Project site include the Compton/Woodley Airport approximately 8.6 miles southwest of the Project site, and the San Gabriel Airport approximately 9 miles northeast of the Project site. According to the County's GIS Viewer, the Project site is located outside of the airport land use plan for both the Compton/Woodley Airport and the San Gabriel Airport (County of Los Angeles Planning 2019). As such, the Project site is not within an airport land use plan or within two miles of a public airport, and as such, the Project would not result in a safety hazard or excessive airport-related noise. **No impact** would occur, and this issue will not be further analyzed in the EIR.

**References**

County of Los Angeles Planning. 2019. "GIS Interactive Map (A-Net)." Accessed August 6, 2019. <http://planning.lacounty.gov/assets/obj/anet/Main.html>.

### 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Potentially Significant Impact.** The Project involves reconstruction of Veterans Memorial Park and an adjacent vacant parcel into a mixed-use development, including public community uses, 825 residential units, and approximately 165,000 square feet of entertainment retail uses. These uses would lead to an increase in the number of employees and residents at the Project site that could alter the population, employment, and housing characteristics for the area through a change in land uses and an increase in the number of jobs available on site.

Using the Southern California Association of Government’s average household size of 3 persons, the proposed dwelling units are expected to accommodate 2,475 residents (SCAG 2016). The Project would also construct approximately 165,000 square feet of commercial uses. The housing and employment opportunities available as part of the Project could induce population growth to the area. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**No impact.** The Project site is located in an urban area and is currently developed with the existing Veterans Memorial Park and an adjacent vacant parcel, formerly occupied with an industrial building. While there are residential neighborhoods in the vicinity of the Project site, the Project site does not contain any neighborhoods or housing. As such, implementation of the Project would not result in displacement of people or housing. Therefore, **no impact** would occur, and this issue will not be further analyzed in the EIR.

**References**

SCAG (Southern California Association of Governments). 2016. *Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*. Adopted April 2016. <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>.

### 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

***Fire protection?***

**Potentially Significant Impact.** Fire services in the City are provided by the Los Angeles County Fire Department. The nearest station in the City is Station No.27, located approximately 1.8 miles northwest of the Project site at 6031 Rickenbacker Road. The Project could have an adverse impact on fire protection providers. Because the Project includes an increase in dwelling units on-site from zero to 825 units, additional calls for service would result, which could affect the service ratio, response time, or other performance objectives of fire protection services. Impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

***Police protection?***

**Potentially Significant Impact.** The Los Angeles County Sheriff’s Department contracts with the City to provide police protection. The nearest first response station to the Project site is the Los Angeles County Sheriff’s Station located approximately 4.8 miles northwest at the Project Site at 5019 East 3<sup>rd</sup> Street within the City of Los Angeles. The Project would lead to an increase in the number of employees and residents at

the Project site, which could increase the number of service calls for police protection. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

**Schools?**

**Potentially Significant Impact.** The City is served by the Montebello Unified School District. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause schools to be constructed or existing schools to be expanded. Because the Project has a residential component, impacts are considered **potentially significant**. This issue will be further examined in the EIR.

**Parks?**

**Potentially Significant Impact.** As previously addressed in Section 3.14, the Project proposes 825 dwelling units that would result in approximately 2,475 residents. Although the Project includes public open space, it is anticipated that a portion of Project's would patronize the various public park and recreation facilities located in close proximity to the Project site. Therefore, potential impacts to existing parks in the area are considered **potentially significant**. This issue will be further analyzed in the EIR.

**Other public facilities?**

**Potentially Significant Impact.** Other public facilities and services provided within the City include library services and City administrative services. An increase in demand for both library services and City administrative services is generally associated with additional residential housing. As described in Section 3.14, the Project would involve residential housing; and therefore, would be expected to generate substantial population growth within the City. Therefore, potential impacts to other public facilities in the area are considered **potentially significant**. This issue will be further analyzed in the EIR.

### 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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

**Potentially Significant Impact.** The City has four neighborhood parks and seven community centers (City of Commerce 2019). As previously addressed in Section 3.14, the Project proposes 825 dwelling units that would result in approximately 2,475 residents. Although the Project includes public open space, it is anticipated that a portion of Project’s would patronize the existing neighborhood and regional parks or other recreational facilities located in close proximity to the Project site. Therefore, potential impacts to existing recreational facilities in the area are considered **potentially significant**. This issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project would result in the construction of open space and recreational facilities. All recreational facilities associated with the Project would be developed on-site and would be evaluated as part of the Project. Further, the Project would result in increases in demand on the City’s recreational resources and could result in the need for expanded facilities or new facilities. Therefore, implementation of the Project could result in a **potentially significant** impact. This issue will be further analyzed in the EIR.

**References**

City of Commerce. 2019. “Parks & Recreation Overview.” Accessed August 6, 2019.  
<http://www.ci.commerce.ca.us/index.aspx?nid=89>.

### 3.17 Transportation

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

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

**Potentially Significant Impact.** The Project includes the demolition of existing buildings and the construction of a new mixed-use development including public community uses, 825 residential units, and approximately 165,000 square feet of entertainment retail uses. Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. Project-generated traffic during operation would include employee-related vehicle trips, vehicle trips from retail patrons, vehicle trips associated with loading/delivery trucks, and vehicle trips from residents of the proposed 825 dwelling units. The trips generated as a result of the Project have the potential to conflict with City policies for the circulation system. As such, a traffic analysis will be prepared to analyze potential conflicts with applicable plans and policies addressing the circulation system. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project could conflict with the provisions of State CEQA Guidelines Section 15064.3, subdivision (b). As such, a traffic impact analysis will be conducted and the results will be included in the EIR. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The Project involves ingress/egress locations for parking accessible from Zindell Avenue. Due to the increased development intensity, which would result from the Project, the Project could alter existing circulation leading to the Project site and create new internal circulation patterns. The Project would also increase pedestrian activity in the area. As such, a traffic impact analysis will be conducted to analyze project site vehicular and pedestrian access. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

- d) *Would the project result in inadequate emergency access?*

**Potentially Significant Impact.** Construction of the Project may involve activities that would have the potential to impede emergency access, such as temporary closure of travel lanes and generation of construction traffic affecting the capacity of adjacent roadways. The Project could also alter the ingress/egress and emergency access locations for the Project site. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

### 3.18 Tribal Cultural Resources

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

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

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

**Potentially Significant Impact.** The Project would involve ground-disturbing activities that would have the potential to disturb tribal cultural resources, in the event that any are present within the Project site. Outreach to local tribes will be undertaken by the City. If any issues related to tribal cultural resources are identified as a result of the City’s ongoing outreach activities, this issue will be further discussed in the EIR. If no tribal cultural resources are identified, no further analysis will be required. Nonetheless, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** See the discussion in Section 3.18(a)(i).

### 3.19 Utilities and Service Systems

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

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

**Potentially Significant Impact.** Because the Project would represent an intensification of use on the Project site compared to existing conditions, Project operation would increase on-site wastewater generation and

water use. Further analysis is required to calculate the wastewater generation and water demand that may be associated with the Project to determine the adequacy of existing wastewater and water facilities.

The Project would be required to comply with the provisions of the WQMP, designed to show how a project would minimize impervious surface and retain or treat stormwater runoff. The Project would also implement BMPs to reduce runoff. However, the Project would increase the impervious areas on-site and could exceed the capacity of the existing storm drainage system.

Additionally, the Project's new residences and commercial uses would create an increased demand on electricity, natural gas, and telecommunication services. As such, the Project's demand could exceed the capacity of these existing facilities. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Based on the 2015 Urban Water Management Plan East Los Angeles (ELA) District, it is anticipated that the ELA District has adequate water supply to serve the City during normal, dry, and multiple dry years (California Water Service 2016). However, the Project would represent an intensification of uses on the Project site compared to existing conditions, which would generate an increase in on-site water use. Additionally, the Project proposes to change the zoning of the existing Veterans Memorial Park from Public Facilities to Specific Plan, which was not accounted for in the 2015 Urban Water Management Plan. Further analysis will be presented in the EIR to determine the sufficiency of existing water supplies relative to anticipated Project demands. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Los Angeles County Sanitation District No. 2 (LACSD) provides sewer collection and treatment services to the City. Under the existing conditions, the Los Coyotes Water Reclamation Plan provides primary, secondary, and tertiary treatment capacity for 37 million gallons of wastewater per day. Because the Project would represent an intensification of use on the Project site compared to existing conditions, Project operation would increase on-site wastewater generation. Further analysis will be presented in the EIR to determine the sufficiency of existing wastewater treatment facilities relative to anticipated Project demands. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The City contracts with CalMet Services to provide waste collection services in the City. Although it is anticipated CalMet Services could accommodate waste generated by the Project without exceeding the capacity of local infrastructure, the Project represents an intensification in land use and change in land use designation. Further analysis is required to determine the increase in solid waste

generated by the Project, and whether this would exceed the capacity at the existing landfills. Therefore, impacts are considered **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Under Assembly Bill (AB) 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. Additionally, the state has set an ambitious goal of 75% recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organic recycling. Further investigation is required to determine whether the Project would comply with federal, state, and local regulations. Therefore, the Project could result in **potentially significant impacts** regarding compliance with regulations related to solid waste disposal. This issue will be further analyzed in the EIR.

**References**

California Water Service. 2016. 2015 Urban Water Management Plan East Los Angeles District. June 2016.  
[https://www.calwater.com/docs/uwmp2015/ela/2015\\_Urban\\_Water\\_Management\\_Plan\\_Final\\_\(ELA\).pdf](https://www.calwater.com/docs/uwmp2015/ela/2015_Urban_Water_Management_Plan_Final_(ELA).pdf).

### 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** According to the California Department of Forestry and Fire Protection’s Fire Hazard Severity Zones maps, the entire City of Commerce and the Project site is neither moderately, highly, or very highly susceptible to wildland fire (CAL FIRE 2019). As such, implementation of the proposed Project is not likely to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Additionally, the Project, including the access driveways, would be reviewed and approved by the City and the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The Project would also be required to comply with all applicable codes and ordinances for emergency access. Therefore, the Project would provide for emergency access and would not interfere with an adopted emergency response plan or emergency evacuation plan. **No impact** would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As previously addressed in Section 3.20(a), the entire City of Commerce and the Project site are not located in a high fire hazard severity zone. The Project is surrounded by roadways and developed properties on which are not susceptible to exacerbating wildfire risks. Although the Rio Hondo River and Path are to the south of the Project site, this portion of the river is concrete lined. Further, the Project site does not contain extensive amounts of vegetation or wildland fuel. Therefore, it is not anticipated that the Project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **No impact** would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** The Project would involve construction of a mixed-use development including park and open space, residential, and commercial uses. The Project would construct surface parking lots, new internal circulation roadways, and infrastructure for the proposed development. It is not anticipated that installation or maintenance of the road would exacerbate fire risk, since the road would be surrounded by developed land on all sides. Further, the Project site is located in a predominantly developed area, and would connect to existing utilities. The Project would not require installation or maintenance of other associated

infrastructure such as fuel breaks, power lines, or other utilities that would exacerbate fire risk. **No impact** would occur, and this issue will not be analyzed further in the EIR.

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

**No Impact.** As previously discussed, the entire City of Commerce and the Project site are not located in a high fire hazard severity zone. Project construction consists of demolition and building in an area of existing and previous development on a relatively flat area. As a result, no incising of hillslopes or degradation of slope stability would occur as a result of Project construction. According to Alquist-Priolo Earthquake Zones of Required Investigation, the Project site is not located in an area susceptible to slope instability (CGS 1989; CGS 1999). In addition, since the Project site is developed and within an urbanized area, it is unlikely that the Project would expose people or structures to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. **No impact** would occur, and this issue will not be analyzed further in the EIR.

**References**

CAL FIRE. 2019. "FHSZ Viewer." Accessed August 6, 2019. <http://egis.fire.ca.gov/FHSZ/>.

CGS (California Geologic Survey). 1989. *Earthquake Zones of Required Investigation – South Gate Quadrangle*. Earthquake Fault Zones Released March 25, 1989. <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>.

CGS. 1999. *Earthquake Zones of Required Investigation – Whittier Quadrangle*. Earthquake Fault Zones Released March 25, 1999. [http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/WHITTIER\\_EZRIM.pdf](http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/WHITTIER_EZRIM.pdf).

### 3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Based on this Initial Study, the Project is not expected to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, further cultural resource investigations are required and will be conducted in the EIR to determine any potential impacts that the Project would have on important examples of the major periods of California history or prehistory. Therefore, impacts are **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As described throughout this Initial Study, the Project has potentially significant impacts requiring further analysis in an EIR for all environmental issue areas except for agriculture and forestry resources, mineral resources, and wildfire. It is anticipated that the Project may be developed while other projects in the area are being developed, and the incremental effect of this Project may be cumulatively considerable. Therefore, impacts are **potentially significant**, and this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As detailed throughout this Initial Study, the Project could result in potentially significant impacts related to aesthetics, air quality, biological resources, cultural resources, energy,

geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. These impacts could have potentially adverse effects on human beings. Therefore, impacts are **potentially significant**, and this issue will be further analyzed in the EIR.

# 4 Report Preparers

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