



Draft Environmental Impact Report
SCH No. 2020069023

5200 Sheila Street Project

City of Commerce, California

Lead Agency

City of Commerce
2535 Commerce Way
Commerce, CA 90040

Public Review Draft | October 2020

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Plot Plan and Development Plan Review

October 2020



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Appendix C Cultural Resources Assessment

Appendix D Energy Analysis

Appendix E Paleontological Resources Assessment

Appendix F Phase I Environmental Site Assessment

Appendix G1 Hydrology Assessment

Appendix G2 Low Impact Development Assessment

Appendix H Noise Impact Analysis

Appendix I1 Focused Traffic Assessment

Appendix I2 VMT Memorandum



ACRONYMS AND ABBREVIATIONS

<u>Acronym</u>	<u>Definition</u>
§	Section
>	greater than
≥	greater than or equal to
a.m./AM	Ante Meridiem (between the hours of midnight and noon)
AAQS	Ambient Air Quality Standards
ADA	Americans with Disabilities Act
AB	Assembly Bill
AC	Acres
ACMs	Asbestos Containing Materials
ACOE	Army Corps of Engineers
AERMOD	Air Quality Dispersion Modeling
ADRP	Archaeological Data Recovery Program
ADT	Average Daily Traffic
AFY	Acre Feet per Year
AMSL	Above Mean Sea Level
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	Above ground storage tanks
Ave.	Avenue
BAAQMD	Bay Area Air Quality Management District
BACM	Best Available Control Measure
BC	Black Carbon
B.C.	Before Christ
bgs	Below ground surface
Blvd.	Boulevard
BMPs	Best Management Practices
BNSF	Burlington Northern Santa Fe Los Angeles Intermodal Facility
BSC	California Building Standards Commission
C3	cubic meter
C2C14	Perchloroethylene
C2F6	Hexafluoroethane
C2H6	Ethane



C4HG	1,3-Butadiene
CA	California
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
Calveno	California Vehicle Noise
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CBMWD	Central Basin Municipal Water District
CCR	California Code of Regulations
CCAA	California Clear Air Act
CDFA	California Department of Food and Agriculture
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	California Fire Code
CFCs	Chlorofluorocarbons
CGS	California Geologic Survey
CHRIS	California Historic Resources Information System
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CO	Carbon Monoxide
COG	Council of Governments
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
CPEP	Clean Power and Electrification Pathway
CPUC	California Public Utilities Commission
CREC	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
CTC	California Transportation Commission
CTD	City of Commerce Transportation Department



CTP	Clean Truck Program
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CWC	California Water Code
cy	Cubic Yards
dB	Decibel
dBA	A-weighted Decibels
DOF	Department of Finance
DOSH	California's Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DRRP	Diesel Risk Reduction Plan
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
e/o	East of
E+P	Existing plus Project Conditions
EIR	Environmental Impact Report
EMFAC	Emission Factor Model
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Environmental Site Assessment
et seq.	et sequentia, meaning "and the following"
ETW	equivalent test weight
EV	Electric Vehicle
F	Fahrenheit
FAR	floor area ratio
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FINDS	Facility Index System
FTA	Federal Transit Administration
GCC	Global Climate Change
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GIS	Geographic Information System



GOBiz	Governor's Office of Business and Economic Development
GVWR	gross vehicle weight rating
GWP	Global Warming Potential
H ₂ S	Hydrogen Sulfide
HCM	Highway Capacity Manual
HDV	Heavy-duty vehicles
HDT	Heavy-duty trucks
HFC	Hydrofluorocarbons
HHDT	Heavy-Heavy-duty trucks
HHSS	Historical Hazardous Substance Storage
HI	Hazard Index
HMBEP	Hazardous Materials Business Emergency Plan
HMMD	Hazardous Materials Management Division
HMMP	Hazardous Materials Management Plan
HMS	Los Angeles County Department of Public Works Hazardous Materials System
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
Hp	horsepower
HREC	Historical Recognized Environmental Conditions
HRI	Historical Resource Inventory
HSC	Health and Safety Code
HSWA	Federal Hazardous and Solid Waste Amendments
HVAC	Heating, Ventilation, and Air Conditioning
HWCL	Hazardous Waste Control Law
I	Interstate
IBank	California Infrastructure and Economic Development Bank
i.e.	that is
ICIS	Integrated Compliance Information System
ICU	Intersection Capacity utilization
ID	Identification
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
ITS	Intelligent Transportation System
JWPCP	Joint Water Pollution Control Plant



kg	kilogram
kBTU	kilo-British thermal units
kWh	kilowatt-hour
LACDPW	Los Angeles County Department of Public Works
LACFD	Los Angeles County Fire Department
LBP	Lead based paint
lbs	pounds
LCA	Life-cycle analysis
LCFS	low carbon fuel standard
LDA	Light duty autos
LDT	Light duty trucks
LDV	Light duty vehicles
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
Leq	equivalent continuous sound level
LEV III	Low-Emission Vehicle Program
LHDT	light-heavy duty trucks
LID	low impact development
Lmax	Maximum level measured over the time interval
Lmin	Maximum level measures over the time interval
LOS	Level of Service
LSTs	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
m ³	cubic meters
MACT	Maximum achievable control technology
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MDT	Medium-duty trucks
MDV	Medium-duty vehicles
MHDT	Medium heavy-duty trucks
MEISC	maximally exposed individual school child
MEIR	maximally exposed individual receptor
MEIW	maximally exposed individual worker
mg	milligrams
MGD	million gallons per day
MICR	Maximum Individual Cancer Risk
MLD	Most Likely Descendent
MM	Mitigation Measure



MMRP	Mitigation Monitoring and Reporting Program
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
Mph	Miles per hour
MPO	Metropolitan Planning Organization
MRR	Mandatory Reporting Rule
MS4	Municipal Separate Storm Sewer System
MT	metric ton
MTCO ₂ e	Metric Tons of Carbon Dioxide Equivalent
MUSD	Montebello Unified School District
N/A	Not Applicable
n/o	North of
N ₂	Nitrogen
n.d.	no date
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NB	Northbound
NHP	National Register of Historic Places
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
No.	Number
NO	Nitric Oxide
NO ₂	Nitrogen Dioxide
NOP	Notice of Preparation
NOX	Nitrogen Oxides
N ₂	Nitrogen
N ₂ O	Nitrous Oxide
NPDES	National Pollutant Discharge Elimination System
n.p.	No page
NPDES	National Pollutant Discharge Elimination System
NZE	near zero emission
O ₂	Oxygen
O ₃	Ozone
OAERP	Operational Area Emergency Response Plan
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
O&M	Operations and Maintenance
OPR	Office of Planning and Research



OSHA	Occupational Safety and Health Assessment
Pb	Lead
PCBs	Polychlorinated biphenyls
PDF	Project Design Feature
PFCs	Perfluorocarbons
PHF	peak hour factor
p.m./PM	Post Meridiem (between the hours of noon and midnight)
PM2.5	Fine Particulate Matter (2.5 microns or smaller)
PM10	Fine Particulate Matter (10 microns or smaller)
Porter-Cologne	Porter-Cologne Water Quality Control Act
ppb	parts per billion
ppm	parts per million
pp.	pages
PRC	Public Resources Code
PRP	Potentially Responsible Parties
PV	photovoltaic
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
Rd.	Road
REC	Recognized environmental Condition
REL	Reference Exposure Level
REMEL	Reference Mean Emission Level
ROGs	Reactive Organic Gasses
ROW	Right of Way
RPS	Renewable Portfolio Standards
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
s/o	south of
sf/s.f.	square foot or square feet
SARA	Superfund Amendments and Reauthorization Act
SB	Southbound
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Sothorn California Association of Governments
SCAQMD	Southern Coast Air Quality Management District
SCCIC	South Central Coastal Information Center



SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SF6	Sulfur Hexafluoride
SGC	Strategic Growth Council
SLF	Sacred Lands File
SGMA	Sustainable groundwater management act
SHMA	Seismic Hazards Mapping Act
SIP	State Implementation Plan
SLPS	Short-Lived Climate Pollutant Strategy
SO2	Sulfur Dioxide
SO4	Sulfates
SOX	Sulfur Oxides
SR	State Route
St.	Street
STC	Sound Transmission Class
SUSMP	Standard Urban Stormwater Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	Toxic Air Contaminants
TBD	To be determined
TEA-21	Transportation Equity Act for the 21st Century
TIA	Traffic Impact Analysis
TRUs	Transportation Refrigeration Units
TSCEA	Toxic Substance Control Act
TSF	Thousand Square Feet
µg	microgram
UBC	Uniform Building Code
UFP	Ultrafine Particles
UNFCCC	United Nations' Framework Convention on Climate Change
UP	Union Pacific Railroad Commerce Railyard
U.S.	United States
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Society
USTs	Underground storage tanks



V/C	Volume to Capacity Ratio
VdB	Velocity (inches per second) and decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VPH	Vehicles per Hour
w/o	West of
WQMP	Water Quality Management Plan
WRF	Water Reclamation Facility
WSA	Water Supply Assessment
ZE	zero emission



S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA) (California Public Resources Code, Sections 21000 et seq.) requires that public agencies consider the potential environmental consequences of projects over which they have discretionary approval authority prior to taking approval action on such projects. An Environmental Impact Report (EIR) is a public document designed to provide lead, responsible, trustee, and interested agencies; special districts; local and State government agency decision-makers; and the public with an analysis of potential environmental consequences of a project to support informed decision-making.

The City of Commerce is the Lead Agency under CEQA and is responsible for preparing the EIR for the proposed 5200 Sheila Street Project (Project). The City, as the Lead Agency, will review and consider this EIR in its decision whether or not to approve the Project. This EIR has been prepared pursuant to the requirements of CEQA and the Guidelines for the Implementation of CEQA (State CEQA Guidelines) (Title 14, California Code of Regulations, Chapter 3, Section 15000 et seq.) and identifies, analyzes, and mitigates to the extent feasible the potential environmental effects associated with the construction and implementation of the Project.

This EIR has been prepared to utilize information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the State CEQA Guidelines (Section 15084[d–e]), this EIR has been prepared by a consultant under the direction of City planning staff. However, prior to certification, the City independently reviewed the methodologies and conclusions reached in the EIR to ensure that the information included in and the conclusions reached in the EIR represent the City’s independent judgment regarding the potential environmental impacts of the Project.

A summary description of the proposed Project is provided in Section S.2 below; a complete description of the Project is provided in Section 3.0, *Project Description*. This document focuses on those environmental impacts identified as potentially significant in the Notice of Preparation (NOP) and Initial Study completed for this Project (refer to Subsection 1.4, *EIR Scope, Format, and Content*, and Appendix A of this EIR). In addition to the analysis of the Project impacts and identification of potentially significant environmental impacts, this EIR identifies appropriate, feasible Project-specific mitigation measures, and discusses potential alternatives to the Project and the ability of alternatives to reduce or eliminate impacts. Following is a summary of the Project; Project alternatives; areas of controversy; issues to be resolved; potential adverse impacts, and corresponding mitigation.



S.2 PROJECT SUMMARY

S.2.1 PROJECT LOCATION AND SETTING

The 5.6-acre Project site is located within northeastern portion of the City of Commerce, California. The City of Commerce is located approximately 6 miles southeast of downtown Los Angeles and is bounded by the City of Montebello to the east, unincorporated East Los Angeles on the north, and the City of Bell Gardens on the south. The City of Commerce is located in southeast Los Angeles County which abuts Kern County to the north; San Bernardino County to the east; Orange County to the south; and Ventura County to the west. The Project site is located at 5200 Sheila St, in the City of Commerce, CA 90040 (Assessor's Parcel Number [APN] 6335-007-021), east of Interstate 710 (I-710) and South Atlantic Boulevard, south of Sheila Street, and north of the Metrolink railroad.

Under existing conditions, the Project site contains two buildings, a guard shack, a 429-space outdoor parking area, and ornamental trees and landscaping. The larger office building on the south portion of the Project site is four-stories, 75-feet high, and 104,888 square feet (sf). The smaller building on western portion of the Project site, used as a cafeteria for office staff, is one-story, 17-feet tall, and 8,065 sf. The combined footage of the current two existing buildings is 112,953 sf.

The site vicinity and surrounding are entirely developed with a mixture of commercial to the north and industrial to the east, south, and west. Residential uses occur further north of the Project site. The BNSF Los Angeles Intermodal Facility ("BNSF") and the Union Pacific Railroad Commerce Railyard ("UP") are located to the west and northwest of the Project site, respectively.

The City of Commerce General Plan designates the property for "Industrial" land uses, which corresponds to "Light Manufacturing (M-1)" and "Heavy Industrial (M-2)" zones. The Project Site is designated as "Heavy Industrial (M-2)," which is intended to provide safeguards and establish adequate buffer distances between uses that pose potentially adverse public health, safety, and welfare impacts and land uses in adjacent, and more restrictive zone districts. The Project site is located within the "Commerce Park Planning Area" which is mostly designated for Industrial with some Commercial uses. Land use policy encourages the continued presence of all types of industry throughout the planning area.

S.2.2 PROJECT DESCRIPTION

As described in Section 3.0 of this EIR, the Project involves the redevelopment of the Project site with a modern, 114,898 sf speculative warehouse and office building with 17 loading docks on the south side of the building. As shown on Figure 3-1 in Section 3.0, of the total square footage of the building, the Project would allocate 100,898 sf for warehousing and 14,000 sf for office uses. Additionally, the Project would include 13,786 sf of landscaping and surface parking. The Project would require the demolition of the existing buildings.



For the purpose of analysis in this EIR, as applicable, it is assumed that Project building would be composed of 40 percent general light industrial and 60 percent warehousing use. The new warehouse building would be a one-story, 41-foot tall building. The Project building would be designed, constructed, operated, and/or maintained in accordance with Leadership in Energy and Environmental Design (LEED). The Project Applicant anticipates that the building would receive between 40-49 points and qualify for a certification level of “Certified.” The building has been designed to be visually compatible with the adjacent buildings. There are three distinct aesthetic styles present on the proposed building which eliminates the appearances of “sameness” or “flat” from publicly visible elevations. The first aesthetic style is present in the center segment of the north elevation, and would be painted with a two-tone color gradient on the gray scale with the lighter portions towards the sky. The second aesthetic style is present on both sides of the north elevation which gives pedestrians a clear indication of the entryways and establishes the elevation’s depth and variety. At the south elevation, facing away from public viewpoints, the structure would install 17 dock doors and 1 drive through door. Loading and unloading activities would be at to the rear of the building out of view from the public right-of-way.

Access to the Project site would be provided by three driveways along Sheila Street to the north. The Project would provide three points of access to the site along Sheila Street and Ralph Lieberman Avenue. The first access point would be located at the northwest corner near the edge of the property line on Sheila Street. This access point would be the primary entryway for truck traffic into the Project site in order to reach the loading docks on the southern elevation, and would permit entrance from vehicles traveling from either direction of Sheila Street. Truck traffic would follow the perimeter of the proposed building, near the Project site boundary, along the western, southern, and eastern edges of the building. Egress from the Project site is made possible by the second access point located at the northeast corner near the edge of the property line on Sheila Street. Vehicles exiting this location would be permitted to enter into either direction of Sheila Street. A third access point would provide access from Ralph Lieberman Avenue which briefly interrupts Sheila Street as it travels east and west. The Ralph Lieberman Avenue access would allow for ingress and egress for office employees.

Truck trailer parking spaces (17 total) would be provided within the truck courts/loading areas on the south side of the building. The Project includes aboveground surface automobile parking with 116 parking spaces along the northern, southern, and western boundaries of the Project side, with a larger surface parking area located north of the Project building. Of the 116 spaces, 102 stalls would be designated as standard, 11 stalls would be designated clean air vehicle, 7 stalls would be designated as parallel, 5 stalls would be designated as EV standard, and 7 stalls would be designated Americans with Disabilities Act (ADA) accessible. The largest parking area would be located to the northeast of the proposed building, with the remaining parking areas to the south and west of the proposed structure. The Project would also install two bike racks at the northeast and southwest corners of the building.

The Project would include 13,786 square feet of landscaping. The adjoining street and all parking areas would be landscaped with a planter strip along the perimeter of the property, except for areas where pedestrian crosswalks and driveways are provided. A minimum of one tree would be provided for



every eight parking spaces, and would be planted to provide uniform shade and coverage. An additional one tree shall be provided for every three hundred square feet of landscaped area. All trees would be of a minimum 24-inch box size.

Exterior lighting would be installed on-site as necessary for safety, security, and wayfinding. Decorative architectural lighting as well as landscape lighting would also be installed to accent building entries as focal points throughout the site. Exterior loading and parking areas would also be illuminated at night. Lighting would be subject to compliance with all applicable Commerce Municipal Code sections.

Approval actions required from the City to implement the Project include: (1) Certification of the 5200 Sheila Street Project Environmental Impact Report; (2) Adoption of the Mitigation Monitoring and Reporting Program; and (3) Approval of a Plot Plan and Development Plan Review.

S.3 PROJECT ALTERNATIVES

CEQA requires that an EIR identify ways to mitigate or avoid the significant effects that a Project may have on the environment; therefore, in accordance with Section 15126.6 of the State CEQA Guidelines, Section 5.0, Alternatives, of this EIR addresses alternatives to the Project. It is typical to consider alternative development scenarios for a Project (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) when identifying potential alternatives to avoid or reduce potential significant impacts resulting from construction or operation of a project to a less than significant level. However, as discussed under Section S.6, below, and as demonstrated through the analysis presented in Section 4.1 through Section 4.9 of this EIR, the Project would not result in any significant and unavoidable impacts. The Project's potential impacts are less than significant with implementation of the Project-level mitigation measures.

Alternatives considered and not carried forward for detailed analysis in this EIR include an alternative site and an alternative development project on-site, as further described in Section 6.2 of this EIR

- **Alternative Site.** Development of the Project at an alternative site would need to occur within the City of Commerce, and specifically within the planning areas where the City of Commerce anticipates future industrial development, as identified in City's General Plan. Locating the Project at other parcels within the City would require lot demolition and displacement of existing land uses to provide a site similar to the size of the Project site (approximately 5.6 acres). Additionally, implementation of the Project at an alternative site would result in environmental impacts similar to those identified for the Project.
- **Alternative Development Project On-Site.** Implementation of an alternative development scenario at the Project site that could potentially meet the established Project objectives would require the removal of the existing buildings and associated facilities, site preparation, grading/excavation, building construction and utility installation (including subsurface detention chambers). Project impacts that require Project-level mitigation are



associated with construction activities, not operation, and would therefore also occur under a potential alternative development scenario onsite. For that reason, there is no need to further evaluate alternative development scenarios.

As required by CEQA, Subsection 6.3.1 of this EIR addresses the No Project Alternative - Reuse of Existing Buildings (No Project Alternative), as described below. The No Project Alternative represents both types of no project alternatives outlined in the CEQA Guidelines: (1) continuation of development consistent with the existing community development type and zoning designations, and (2) assumes the Project does not proceed.

- **No Project Alternative – Reuse of Existing Buildings.** Under the No Project Alternative, the existing buildings and associated facilities on the Project site would be retained and reoccupied for use consistent with that allowed by right pursuant to Section 19.11, Manufacturing Zones, of the City’s Municipal Code. This includes, but is not limited to, ongoing industrial and office uses. The Project is consistent with City’s General Plan land use designation and zoning for the Project site and a General Plan Amendment or Change of Zone is not needed. The Project represents the development that would be allowed under current City regulations. The Project would not result in any significant and unavoidable impacts after mitigation for any topical issues.

S.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the Project, the key issues to be resolved include decisions by the City of Commerce as the Lead Agency, as to:

- Whether this environmental document adequately describes the potential environmental impacts of the Project;
- Whether the recommended mitigation measures should be modified and/or adopted;
- Whether the project benefits override the environmental impacts that cannot be feasibly avoided or mitigated to less than significant levels;
- Whether other mitigation measures should be applied to the project besides those identified in the EIR; and
- Whether there are any alternatives to the Project that would substantially lessen any of its significant impacts while achieving most of the basic Project objectives.

S.5 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by other agencies and the



public. This EIR has taken into consideration the comments received from the public and various agencies in response to the Notice of Preparation (NOP) of a Draft EIR. Written comments received during the NOP and scoping period are contained in Subsection 1.4.1, *Draft EIR Scope*. Environmental issues in the comment letters are summarized in Table 1-1 of this EIR, and are addressed in each relevant issue area analyzed in Sections 4.1 through 4.9 of this EIR.

Comments received in response to the NOP and at the scoping meeting include: air quality impacts; air quality impacts upon low-income and disadvantaged communities; public parking impacts; traffic impacts; low impact development and landscaping; and impacts to tribal cultural resources. For a more detailed list of the comments received, see Table 1-1 of this EIR. For written comments on the NOP, see Appendix A.

S.6 SUMMARY OF ENVIRONMENTAL IMPACTS

Table S-1, *Mitigation Monitoring and Reporting Program*, presents a summary of the environmental impacts resulting from the Project, including each of the environmental topics identified in the NOP as having potentially significant impacts. Section 6.0, Other CEQA Considerations, of this EIR discusses the environmental topics for which it was determined that no further analysis is required.

Based on the Initial Study, the environmental topics identified for further study in this EIR include: Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas (GHG) Emissions, Hazards and Hazardous Materials, Noise, Transportation, and Tribal Cultural Resources. The potential direct and indirect impacts and cumulative impacts for these topical issues are addressed in Sections 4.1 through 4.9 of this EIR. Growth-inducing impacts and significant irreversible environmental changes are addressed in Section 5.0, *Other CEQA Considerations*.

For each environmental topic, Table S-1 identifies mitigation measures that are applicable to the Project. Project-specific mitigation measures are required to reduce potentially significant impacts for the following topical issues: Cultural Resources (due to the potential to encounter buried archaeological resources), Geology and Soils (due to the potential to encounter buried paleontological resources), and Tribal Cultural Resources (due to the potential to encounter buried tribal cultural resources). These potentially significant impacts are associated with construction activities, not operation of the Project, and would be reduced to a less than significant level with mitigation incorporated. The Project would not result in any significant and unavoidable impacts.

S.7 MITIGATION MONITORING

State law requires the preparation of a mitigation monitoring and reporting program (MMRP) to ensure that measures that would avoid or lessen significant environmental effects of the project are adopted as conditions of approval for the project. The mitigation measures identified in this EIR have been described in sufficient detail to provide the necessary information to identify the party or parties responsible for carrying out the mitigation, when the mitigation will be implemented, and why the mitigation has been required. An MMRP would be adopted by the City at the time of Project approval.



Table S-1 Mitigation Monitoring and Reporting Program

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
4.1 AIR QUALITY		
Threshold a: Project construction and operational-source emissions would not exceed the regional or localized significance thresholds, and the Project would not result in or cause National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) violations. Additionally, the Project is consistent with the growth assumptions in the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). The Project therefore would be consistent with the AQMP. No impact would result.	No mitigation is required.	Less than Significant Impact
Threshold b: The Project's net air pollution emissions during construction and operation would not exceed the SCAQMD regional thresholds of significance. As such, the Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is in non-attainment. Impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold c: Localized construction and operational emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Project-related operational diesel particulate matter (DPM) emissions would not expose nearby sensitive receptors to substantial pollutant concentrations. The Project would not cause a significant human health or cancer risk to nearby residences or workers during construction. Furthermore, the Project is not anticipated to result in a CO hot spot in the Project area.	No mitigation is required.	Less than Significant Impact



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
Impacts to sensitive receptors would be less than significant.		
Threshold d: The Project does not include a land use that is typically associated with odor complaints. Potential sources of odor associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction. Compliance with SCAQMD Rule 402 and Fullerton Municipal Code Section 15.40.080, which regulate odors is required. Therefore, odors associated with the Project's construction and operation would be less than significant.	No mitigation is required.	Less than Significant Impact
4.2 CULTURAL RESOURCES		
Threshold a: Existing structures at the Project site are not eligible for listing in the California Register of Historical Resources (CRHR), not eligible for listing pursuant to the <i>National Register Bulletin: How to Apply the National Register Criteria for Evaluation</i> , and not a known point of historical interest in the City of Commerce. No impacts to historic resources would occur.	No mitigation is required.	No Impact
Threshold b: The Project site is previously disturbed, and covered with buildings, pavement, and landscaping. The Project site does not contain the presence of a sacred site as would be indicated in the Sacred Lands Files (SLFs). An archaeological records search was performed at the South Central Coastal Information Center (SCCIC). The buildings located on site have been recorded with the SCCIC as Temp-1, which has not been evaluated as significant. However, ground disturbing activities have a low potential to encounter unidentified archaeological resources, resulting in a potentially significant impact.	Project Level Mitigation Measure MM 4.2-1 Prior to the issuance of a grading permit, the project applicant shall retain a archaeological monitor to be present full-time during all soil disturbing and grading/excavation/trenching activities. Monitor(s) shall be present during grading/excavation/trenching. The archaeological monitor shall be present full-time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources. The principal investigator (PI) may submit a detailed letter to the lead agency during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil	Less than Significant Impact with Mitigation



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	<p>formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.</p> <p>MM 4.2-2 If historic or prehistoric archaeological resources are discovered during grading activities, the archaeological monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the Native American monitor. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.</p> <p>a. The PI shall evaluate the significance of the resource. The PI shall immediately notify the City of Commerce to discuss the significance determination and shall also submit a letter indicating whether additional mitigation is required. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) that has also been reviewed by the Native American consultant/monitor, and obtain written approval from the City of Commerce to implement that program. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. If the resource is not significant, the PI shall submit a letter to the City of Commerce indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that that no further work is required.</p> <p>b. If human remains are discovered, work shall halt in that area until a determination can be made regarding the</p>	



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	<p>provenance of the human remains. The following procedures, as set forth in CEQA Section 15064.5(e), the California PRC (Section 5097.98), and the State Health and Safety Code (Section 7050.5), shall then be undertaken: 1) The archaeological monitor shall notify the PI, if the monitor is not qualified as a PI, and the PI shall notify the Los Angeles County Medical Examiner-Coroner after consultation with the City of Commerce, either in person or via telephone; and 2) Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner-coroner in consultation with the PI concerning the provenance of the remains, and the medical examiner-coroner, in consultation with the PI, will determine the need for a field examination to determine the provenance.</p> <ul style="list-style-type: none">• If human remains are determined to be Native American, the medical examiner-coroner or the designated custodian of the remains will notify the NAHC within 24 hours. The NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. The MLD will contact the PI within 24 hours or sooner after the medical examiner-coroner has completed coordination to begin the consultation process in accordance with CEQA Section 15064.5(e), the California PRC, and the State Health and Safety Code. The MLD will have 48 hours to make recommendations	



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	<p>to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods. Disposition of Native American human remains will be determined between the MLD and the PI.</p> <ul style="list-style-type: none">• If human remains are not Native American, the PI shall contact the medical examiner-coroner and notify them of the historic-era context of the burial. The medical examiner-coroner will determine the appropriate course of action with the PI and city staff (PRC 5097.98). If the remains are of historic origin, they shall be appropriately removed and conveyed to the City of Commerce. The decision for internment of the human remains shall be made in consultation with City, the applicant/landowner, and any known descendant group. <p>MM 4.2-3 Prior to issuance of an occupancy permit, the PI shall submit to the City of Commerce a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program (with appropriate graphics). For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report. Recording sites with the State of California DPR shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring</p>	



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	program. The PI shall submit a revised draft monitoring report to the City of Commerce for approval, including any changes or clarifications requested by the City. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. The cost for curation is the responsibility of the property owner. The PI shall submit the approved final monitoring report to the City of Commerce and any interested parties.	
4.3 ENERGY		
Threshold a: The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction, transportation, or operation. Impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold b: The Project would not cause or result in the need for additional energy production or transmission facilities. The Project would not engage in the wasteful or inefficient uses of energy and the Project would not obstruct the achievement of energy conservation goals within the State of California. Thus, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	No mitigation is required.	No Impact
4.4 GEOLOGY AND SOILS		
Threshold f: Although no paleontological resources are known to occur within the Project's impact limits, grading	<i>Project-Level Mitigation Measures</i>	Less than Significant Impact with Mitigation



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
activities within older Quaternary alluvial deposits has the potential to uncover paleontological resources.	MM 4.4-1 Prior to issuance of a grading permit, the project applicant shall retain a paleontologist to monitor grading activities 5 feet below the surface. Periodic spot checks should be performed from five feet below the surface to a depth of eight feet, to determine the presence of Pleistocene strata or fossils. Once Pleistocene strata are recognized or fossils are discovered, or excavation depths proceed beyond eight feet deep, full-time monitoring for paleontological resources is required.	
	MM 4.4-2 Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.	
	MM 4.4-3 Recovered specimens shall be prepared to a point of identification and permanent preservation, including screen-washing sediments to recover small invertebrates and vertebrates if indicated by the results of test sampling. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the developer.	



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	MM 4.4-4 Prior to the issuance of an occupancy permit, the Project applicant shall submit a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the City of Commerce, will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.	
4.5 GREENHOUSE GAS EMISSIONS		
Threshold a: The Project will result in approximately 1,806.45 MT CO ₂ e/yr; the proposed Project would not exceed the SCAQMD/City's screening threshold of 10,000 MT CO ₂ e per year. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.	No mitigation is required.	Less than Significant Impact
Threshold b: The Project would not conflict with the 2017 Scoping Plan Update, nor any other applicable plan, policy, or regulation of an agency adopted for the purposes of reducing the emissions of GHGs. Accordingly, the Project would have a less than significant impact and no mitigation or further analysis is required.	No mitigation is required.	No Impact
4.6 HAZARDS AND HAZARDOUS MATERIALS		
Threshold a, b: The Project-specific Phase I ESA (EIR Appendix F) did not identify any existing RECs, HRECs, CRECs, significant data gaps, or significant business environmental risks in connection with the Project, except for a potential business environmental risk surrounding the possibility of ACM on the existing buildings based on their date of construction. The Project would involve construction and uses in conformance with the City of Commerce General	No mitigation is required.	Less than Significant Impact



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
Plan, and future operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, and disposal of hazardous substances. The existing O&M program, dated October 18, 2011, is sufficient to maintain the ACMs in accordance with current regulatory standards. Furthermore, as the Project proposes demolition of the ACM building, short-term construction and demolition of existing buildings activities would have the potential to expose and disturb ACMs. Abatement of ACM encountered during any future building demolition would be required to be conducted in accordance with all applicable regulations. Accordingly, the Project would result in less than significant impacts with respect to hazardous materials.		
Threshold c: The Project site is located approximately one-quarter mile of an existing school, but has no potential to have a project related or cumulatively considerable effect associated with the emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. Despite the Project site proximity to the nearest school, the industrial and commercial business operations will be conducted within enclosed spaces, except for truck deliveries which will be conducted at loading docks behind the proposed building. Further, due to the Project site's close proximity to the I-705 and I-5 Freeways and compliance with designated truck routes. Impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
4.7 NOISE		
Threshold a: Noise generated by Project construction activities would result in a less than significant increase in ambient noise levels. During long-term operation of the Project, the Project would not expose persons to or generate noise levels in excess of local standards and would not result	No mitigation is required	Less than Significant Impact



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Additionally, under long-term operation, Project-related traffic would not expose persons to or generate noise levels in excess of local standards and would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Accordingly, the Project's long-term noise impacts would be less than significant.		
Threshold b: The Project's construction and operational activities would not result in a perceptible groundborne vibration or noise.	No mitigation is required.	Less than Significant Impact
4.8 TRANSPORTATION		
Threshold a: The proposed Project would be consistent with all applicable policies identified in the City of Commerce General Plan. Accordingly, impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold b: The proposed Project is anticipated to result in an increase of 6 trips per day as compared to the existing use. As the Project is anticipated to generate a nominal change in daily trip generations as compared to the existing use, the net change in trips would be consistent with OPR's small projects screening threshold of 110 daily vehicle trips and would therefore be result in a less than significant impact.	No mitigation is required.	Less than Significant Impact
Threshold c: The Project intersections have been assessed for truck and auto access and circulation and do not pose a hazard due to a geometric design feature or incompatible uses. Accordingly, impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
4.9 TRIBAL CULTURAL RESOURCES		
Threshold a: Based on the records search conducted at the South Central Coastal Information Center, and review of existing literature related to cultural and historic resources	<i>Project Level Mitigation Measure</i>	Less than Significant Impact with Mitigation



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
within the Project site, although no tribal cultural resources are known to occur within the Project's impact limits, implementation of the Project has the potential to uncover previously undiscovered tribal cultural resources buried underneath the site's surface.	<p>MM 4.9-1</p> <p>Prior to the issuance of a grading permit, the applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with the City during the AB 52 process. The applicant shall coordinate with the Tribe(s) to develop a Tribal Monitoring Agreement(s). A copy of the agreement shall be provided to the City of Commerce Planning Department prior to the issuance of a grading permit.</p> <p>If a significant tribal cultural resource is discovered on the property, ground disturbing activities shall be suspended 50 feet around the resource(s). A representative of the appropriate Native American Tribe(s), the Project Applicant, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented to protect the identified tribal cultural resources from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resources(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the tribal cultural resources in accordance with current professional archeology standards. The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery and shall require that all recovered artifacts undergo basic field analysis and documentation or laboratory analysis, whichever is appropriate. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered tribal cultural resources shall be processed and curated according to current professional repository standards. The collection and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the City of Commerce. A final</p>	



Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	report containing the significance and treatment findings shall be prepared by the archeologist and submitted to the Commerce Planning Department and the appropriate Native American Tribe.	



1.0 INTRODUCTION

This Draft Environmental Impact Report (“Draft EIR” or “EIR”) is an informational document that represents the independent judgment of the City of Commerce, acting as the Lead Agency pursuant to the California Environmental Quality Act (CEQA), and evaluates the physical environmental effects that could result from constructing and operating the proposed 5200 Sheila Street Project (hereafter, the “Project”). Discretionary actions and other related ministerial actions that are required to construct and operate the Project also are described in this EIR.

When the term “Project” is used in this EIR with the initial letter capitalized, the term shall mean all aspects of the planning, construction, and operation of the 5200 Sheila Street Project, including all discretionary and administrative approvals and permits required for its implementation. When the term “Project Applicant” is used with the initial letters capitalized, the term shall mean GPT Sheila Street Owner LP, which is the entity that submitted applications to the City of Commerce to entitle the Project site as proposed and as evaluated in this EIR.

1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY FOR THIS DRAFT EIR

This Draft EIR has been prepared in compliance with the California Environmental Quality Act (Public Resources Code § 21000 et. seq. (“CEQA”), as amended, and the CEQA State Guidelines (Title 14 California Code of Regulations § 15000 et. seq.) (“CEQA Guidelines”), as amended. As stated by CEQA Guidelines § 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed government actions (including the discretionary approval of land entitlement applications submitted by private parties);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if a project will be approved involving significant environmental effects.

Following preliminary review of the Project’s application materials, the City of Commerce concluded that the Project and its associated implementing actions have the potential to result in significant environmental effects; as such, the City proceeded with preparation of this EIR pursuant to CEQA Guidelines Section 15060(d). The City determined that a Project EIR, as described in CEQA Guidelines Section 15161, would be required. Accordingly, this document serves as a Project EIR. As required by CEQA Guidelines Section 15161, this Project EIR shall “...focus primarily on the changes in the environment that would result from the development project,” and “...examine all



phases of the project including planning, construction, and operation.” Also, in conformance with CEQA Guidelines Section 15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project, (2) identify possible ways to minimize or avoid those significant effects, and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

The City of Commerce is the Lead Agency for the proposed Project, under whose authority this EIR has been prepared. The Project Applicant proposes to develop one (1) warehouse building on an approximately 5.65-acre property located east of Washington Boulevard and Interstate 710 (I-710) in the City of Commerce. As the Project site is currently developed, implementation of the Project would include the demolition of existing structures, parking area, and landscaping before construction of the Project. Subsequently, improvements, including drive aisles, landscaping, utility infrastructure, water quality basins, exterior lighting, walls/fencing, and signage, would be constructed.

Specifically, the Project Applicant is requesting the following governmental approval from the City of Commerce to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project’s construction and operational characteristics):

- **Plot Plan and Development Plan Review** is proposed to allow for the redevelopment of the Project site with an approximate 114,898 square foot (s.f.) warehouse building and associated improvements.

1.3 CEQA PROCESS OVERVIEW

The California Environmental Quality Act (CEQA) (Public Resources Code, §§ 21000- 21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§ 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project’s anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an EIR must be prepared. The “scope” of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.



Pursuant to CEQA Guidelines § 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and, consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by or under the direction of the Lead Agency, the City of Commerce. The City of Commerce ("City") is the public agency that has the primary responsibility for approving or carrying out the Project. Further, Responsible and Trustee Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the City.

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices, represent the complete record of the EIR. Throughout this document, the terms Final EIR or Draft EIR may be used interchangeable since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

In accordance with CEQA Guidelines § 15087, this Draft EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines § 152049(a)). Responses to written comments received during the public review period will be included in the Final EIR ("FEIR"). During the decision-making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record will be considered by City of Commerce decision-makers. If the FEIR is certified and the Project approved, City of Commerce and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the FEIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

1.4 DRAFT EIR SCOPE, FORMAT, AND CONTENT

1.4.1 DRAFT EIR SCOPE

As a first step in complying with the procedural requirements of CEQA, an Initial Study was prepared by the City of Commerce to preliminarily identify the environmental issue areas that may be adversely impacted by the Project. Following completion of the Initial Study, the Lead Agency filed a Notice of



Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP was filed with the State Clearinghouse and distributed to Responsible Agencies, Trustee Agencies, and other interested parties on June 12, 2020, for a 30-day public review period that ended on July 14, 2020. The NOP was distributed for public review to solicit responses to help the City of Commerce identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

As a result of the Initial Study and in consideration of all comments received by the Lead Agency on the NOP, Section 4.0 of this EIR evaluates the Project's potential to cause adverse effects to the following environmental issue areas:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Transportation
- Tribal Cultural Resources

The Project's potential to result in growth-inducing impacts are discussed in Section 5.0, *Other CEQA Considerations*, of this Draft EIR. The Initial Study, NOP, public review distribution list, and written comments received by the City of Commerce during the NOP public review period are provided in Technical Appendix A to this EIR. Please refer to Table 1-1, *Summary of NOP Comments*, for comments received during NOP public review period.

Table 1-1 Summary of NOP Comments

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
Comments Received at Scoping Meeting	June 24, 2020	• Request to analyze potential air quality impacts and noise generation to prevent harm to nearby residences and schools.	• Subsection 4.1, <i>Air Quality</i> , and Subsection 4.7, <i>Noise</i>
		• Request to ensure sufficient on-site parking to prevent street parking.	• Subsection 3.0, <i>Project Description</i>
		• Request to analyze traffic impacts at Sheila Street and Atlantic Boulevard.	• Subsection 4.8, <i>Transportation</i>



Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		<ul style="list-style-type: none">Request to ensure that the on-site landscaping will be consistent with the zoning code and that a Low Impact Development (LID) is prepared for the Project.	<ul style="list-style-type: none">Appendix A, G1, and G2
California Air Resources Board (CARB)	July 15, 2020	<ul style="list-style-type: none">Request to consider and include Senate Bill 535 to prevent air quality impacts upon low-income and disadvantaged communities and allocate funding to benefit disadvantaged communities.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to consider and include Senate Bill 1000 which requires local governments that have identified disadvantaged communities to incorporate the addition of an environmental justice element into their general plans to identify objectives and policies to reduce unique or compound health risks in disadvantaged communities.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to consider and include Assembly Bill 617 which requires new community-focused and community-driven action reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to model air pollution emissions from on-site trucks equipped with transportation refrigeration units (TRUs).	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to include potential cancer risks from on-site TRUs in the Project's HRA, which should account for all potential health risks from Project-related diesel particulate matter emissions sources.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>



Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		<ul style="list-style-type: none">Request to include health risks associated with construction emissions in the Project's air quality section and the Project's HRA, which should include diesel short-term diesel emissions and assess cancer risks according to the Office of Environmental Health Hazard Assessment's (OEHHA) guidance.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to include the latest OEHHA guidance (2015 Air Toxic Hot Spots Program Guidance Manual for Preparation of Health Risks Assessments), and SCAQMD's CEQA Air Quality Handbook as supporting materials to the Project's HRA.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to include all existing and emerging zero-emission technologies to minimize diesel PM and oxides of nitrogen (NO_x) emissions, as well as GHGs that contribute to climate change.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
California Department of Transportation (Caltrans) District 7	July 14, 2020	<ul style="list-style-type: none">Request to incorporate multi-modal and complete streets transportation elements into the Project.	<ul style="list-style-type: none">Subsection 4.8, <i>Transportation</i>
		<ul style="list-style-type: none">Vehicle Miles Traveled (VMT) will be the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. Agencies may opt-in prior to that date	<ul style="list-style-type: none">Subsection 4.8, <i>Transportation</i>
		<ul style="list-style-type: none">Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. The Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure.	<ul style="list-style-type: none">Subsection 4.8, <i>Transportation</i>



Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		<ul style="list-style-type: none">Request that the EIR include a Transportation Impact Study (TIS) to ensure all modes are well served by planning and development activities, including reducing single occupancy vehicle trips, ensuring safety, reducing VMT, supporting accessibility, and reducing GHG.	<ul style="list-style-type: none">Subsection 4.8, <i>Transportation</i>
		<ul style="list-style-type: none">Request that the City of Commerce evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network.	<ul style="list-style-type: none">Subsection 4.8, <i>Transportation</i>
		<ul style="list-style-type: none">Request that a truck turning movement study be prepared to evaluate any potential safety issues.	<ul style="list-style-type: none">Subsection 4.8, <i>Transportation</i>
The Los Angeles County Fire Department (LACoFD)	July 14, 2020	<ul style="list-style-type: none">Indicating a clerical error in the Initial Study as it pertains to the use of the term 'Los Angeles County Fire Department,' and an incorrect statement.	<ul style="list-style-type: none">General comment, revised accordingly.
		<ul style="list-style-type: none">LACoFD lists design and land development regulations from the Title-32, <i>Fire Code</i>.	<ul style="list-style-type: none">Appendix A
Native American Heritage Commission (NAHC)	June 16, 2020	<ul style="list-style-type: none">Request that the Draft EIR address AB 52, SB 18, and any other applicable laws, and to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project as early as possible.	<ul style="list-style-type: none">Subsection 4.9, <i>Tribal Cultural Resources</i>
Southern California Association of Governments (SCAG)	July 14, 2020	<ul style="list-style-type: none">Requests to receive the Project's EIR (including technical appendices) when available.	<ul style="list-style-type: none">SCAG is included on the mailing list for notices related to this EIR. No analysis necessary.
		<ul style="list-style-type: none">SCAG provides the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals which may be applicable to the	<ul style="list-style-type: none">Appendix A, Subsection 3.4.11, <i>Land Use and Planning</i>



Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		Project and encourages inclusion of a side-by-side consistency analysis in the EIR.	
		<ul style="list-style-type: none">• SCAG provides population, households, and employment growth forecasts for the SCAG region.	<ul style="list-style-type: none">• No analysis necessary.
		<ul style="list-style-type: none">• Recommendation to review the Final Program EIR for the 2016 RTP/SCS for guidance when preparing and adopting performance standards-based mitigation measures.	<ul style="list-style-type: none">• No analysis necessary.
South Coast Air Quality Management District (SCAQMD)	July 16, 2020	<ul style="list-style-type: none">• Requests to receive the Project's EIR (including technical appendices) when available.	<ul style="list-style-type: none">• SCAQMD is included on the mailing list for notices related to this EIR. No analysis necessary.
		<ul style="list-style-type: none">• Recommendation to use the SCAQMD's CEQA Air Quality Handbook (1993) when preparing the air quality analysis.	<ul style="list-style-type: none">• Subsection 4.1, <i>Air Quality</i>, and Subsection 4.5, <i>Greenhouse Gas Emissions</i>
		<ul style="list-style-type: none">• Recommendation to use the CalEEMod land use emissions software when preparing the air quality analysis.	<ul style="list-style-type: none">• Subsection 4.1, <i>Air Quality</i>, and Subsection 4.5, <i>Greenhouse Gas Emissions</i>
		<ul style="list-style-type: none">• Request to identify any potential adverse air quality impacts that could occur from all phases of the Project (including demolition, construction, and operation) and all air pollutant sources related to the Project.	<ul style="list-style-type: none">• Subsection 4.1, <i>Air Quality</i>, and Subsection 4.5, <i>Greenhouse Gas Emissions</i>
		<ul style="list-style-type: none">• Request to quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds. Additional request to calculate localized air quality impacts and compare the results to localized significance thresholds (LSTs).	<ul style="list-style-type: none">• Subsection 4.1, <i>Air Quality</i>



Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		<ul style="list-style-type: none">Request to quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds. Additional request to calculate localized air quality impacts and compare the results to localized significance thresholds (LSTs).	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>, and Subsection 4.8, <i>Transportation</i>
		<ul style="list-style-type: none">Request that the City of Commerce perform a mobile source health risk assessment.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>
		<ul style="list-style-type: none">Request to assess the Project's diesel particulate matter (DPM) emissions to prevent health impacts in residences near the Project and to assess and disclose the cumulative DPM emissions from other industrial sources in the area.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>, and Subsection 4.5, <i>Greenhouse Gas Emissions</i>
		<ul style="list-style-type: none">In the event that significant adverse air quality impacts are identified, SCAQMD recommends consulting several information sources for mitigation measures.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>, and Subsection 4.5, <i>Greenhouse Gas Emissions</i>
		<ul style="list-style-type: none">SCAQMD lists several mitigation measures for the Lead Agency to consider to reduce air quality impacts from operational mobile and area source emissions.	<ul style="list-style-type: none">Subsection 4.1, <i>Air Quality</i>, and Subsection 4.5, <i>Greenhouse Gas Emissions</i>
Supporters Alliance for Environmental Responsibility (SAFER)	June 18, 2020	<ul style="list-style-type: none">Requests to receive notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law.	<ul style="list-style-type: none">SAFER is included on the mailing list for notices related to this EIR. No analysis necessary.

1.4.2 USE OF THIS EIR

This EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (CEQA Guidelines § 152049(a)). During the decision-making process, the



Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by City of Commerce decision-makers.

1.4.3 CONTENT AND ORGANIZATION OF THIS DRAFT EIR

This Draft EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, Section 21000 et. seq. and California Code of Regulations, Title 14, Chapter 5). This Draft EIR is organized in the following manner:

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the proposed Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR's Mitigation, Monitoring, and Reporting Program.
- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City of Commerce, serving as the Lead Agency for this EIR; a brief description of the Project; the purpose of this EIR; applications proposed by the Project Applicant that would require discretionary City approvals; permits and approvals required by other agencies; and an overview of the EIR format.
- **Section 2.0, Environmental Setting**, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was released for public review. The setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.
- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to CEQA Guidelines § 15123. This section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project's lifetime. In addition, the discretionary actions required of the City of Commerce and other government agencies to implement the Project are discussed.



- **Section 4.0, Environmental Analysis**, provides an analysis of the potential direct, indirect, and cumulative impacts that may occur from implementing the proposed Project. The topics analyzed in this section include the topics summarized above under subsection 1.4.1. Topics that were found to have no potential of being significantly impacted are discussed in Section 5.0, *Other CEQA Considerations*. A conclusion concerning significance is reached for each discussion, and mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as “effects” or “impacts” interchangeably. The CEQA Guidelines also describe the terms “effects” and “impacts” as being synonymous (CEQA Guidelines § 15358).

In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the proposed Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in CEQA Guidelines § 15355 as “...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”

The analyses in Section 4.0 are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be “roughly proportional” to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations (SOC) would need to be adopted by the City of Commerce pursuant to CEQA Guidelines § 15093.

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project’s significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project. Section 5.0 also includes a discussion of the potential environmental effects that were found not be significant during the preparation of this EIR.



- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. Two (2) alternatives are presented in Section 6.0.
- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted during preparation of this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.



Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Table of Contents	§ 15122	Table of Contents
Summary	§ 15123	Section S.0
Project Description	§ 15124	Section 3.0
Environmental Setting	§ 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	§ 15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	§ 15126.2(b)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented	§ 15126.2(c)	Subsection 5.2
Growth-Inducing Impacts of the Proposed Project	§ 15126.2(d)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	§ 15126.4	Section 4.0 & Table S-1
Consideration and Discussion of Alternatives to the Proposed Project	§ 15126.6	Section 6.0
Effects Not Found to be Significant	§ 15128	Subsection 5.4
Organizations and Persons Consulted	§ 15129	Section 7.0 & Appendices
Discussion of Cumulative Impacts	§ 15130	Section 4.0
Energy Conservation	Appendices F and G	Subsection 4.3

1.4.4 INCORPORATION BY REFERENCE

CEQA Guidelines § 15147 states that the “information contained in an EIR shall include summarized... information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public,” and that the “placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided.” CEQA Guidelines § 15150 allows for the incorporation “by reference all or portions of another document... [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the City of Commerce, Public Works & Development Services Department, 2535 Commerce Way, Commerce, CA 90040, during the City’s regular business hours and the City’s



website at: <http://www.ci.commerce.ca.us/index.aspx?NID=357>. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

- A. Initial Study, Notice of Preparation, and Written Comments on the NOP
- B1. Air Quality Impact Assessment
- B2. Health Risk Assessment
- B3. Greenhouse Gas Analysis
- C. Cultural Resources Assessment
- D. Energy Analysis
- E. Paleontological Resources Assessment
- F. Phase I Environmental Site Assessment
- G1. Hydrology Assessment
- G2. Low Impact Development Assessment
- H. Noise Impact Analysis
- I1. Focused Traffic Assessment
- I2. VMT Memorandum

Other reference sources that are incorporated into this EIR by reference are listed in Section 7.0, *References*, of this EIR. In most cases, documents or websites not included in the EIR's Technical Appendices are cited by a link to the online location where the document/website can be viewed by the public. All references relied upon by this EIR are included as part of City of Commerce's Administrative Record pertaining to the proposed Project.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resource Code (§ 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines § 15082 and § 15086(a)). As defined by CEQA Guidelines § 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in CEQA Guidelines § 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

For the proposed Project, the Santa Ana River Basin Water Quality Control Plan is responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality. The Native American Heritage Commission (NAHC) is identified as a Trustee Agency for the proposed Project in their capacity to prevent irreparable damage to sacred sights and to prevent interference with Native American Religion in California. There are no other agencies that are identified as Responsible or Trustee Agencies for the proposed Project.



1.6 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOP were previously summarized in Table 1-1. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the City during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this Draft EIR.

The Lead Agency has not identified any issues of controversy associated with the proposed Project after consideration of all comments received in response to the NOP and during the Project's scoping meeting.



2.0 ENVIRONMENTAL SETTING

This Section 2.0 is provided pursuant to CEQA Guidelines § 15125(a), and includes a description of the physical environmental conditions in the vicinity of the Project site and its off-site improvement areas from both a local and regional perspective as it existed at the time the Notice of Preparation (NOP) was published for this Draft EIR. This section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual issue areas is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this Draft EIR.

2.1 REGIONAL SETTING AND LOCATION

The 5.6-acre Project site (“Project site”) is located within north eastern portion of the City of Commerce, California. Figure 2-1, *Regional Map*, depicts the Project site’s location within the regional vicinity. As shown, the City of Commerce is located approximately 6 miles southeast of downtown Los Angeles and is bounded by the City of Montebello to the east, unincorporated East Los Angeles on the north, and the City of Bell Gardens on the south. The City of Commerce is located in southeast Los Angeles County which abuts Kern County to the north; San Bernardino County to the east; Orange County to the south; and Ventura County to the west. As of 2018, SCAG estimates that the City of Commerce had a population 13,067 (SCAG, 2018, p. 6).

2.2 LOCAL SETTING AND LOCATION

As depicted on Figure 2-2, *Vicinity Map*, the Project site that is the subject of this EIR is located at 5200 Sheila St, in the City of Commerce, CA 90040 (Assessor’s Parcel Number [APN] 6335-007-021), east of Interstate 710 (I-710) and South Atlantic Boulevard, south of Sheila Street, and north of the Metrolink railroad. Under existing conditions, the Project site contains two buildings, a guard shack, a 429-space outdoor parking area, and ornamental trees and landscaping. The larger office building on the south portion of the Project site is four-stories, 75-feet high, and 104,888 square feet (sf). The smaller building on west portion of the Project site, used as a cafeteria for office staff, is one-story, 17-feet tall, and 8,065 sf. The combined footage of the current two existing buildings is 112,953 sf.

2.3 SURROUNDING LAND USES AND DEVELOPMENT

The site vicinity and surrounding are entirely developed with a mixture of commercial to the north and industrial to the east, south, and west. Residential uses occur further north of the Project site. The BNSF Los Angeles Intermodal Facility (“BNSF”) and the Union Pacific Railroad Commerce Railyard (“UP”) are to the west and northwest of the Project site, respectively. Land uses in the immediate vicinity of the Project site are shown on Figure 2-3, *Surrounding Land Uses and Development*, and described below.



- North: To the north of the Project site is Sheila Street, a commercial shopping center, and residential uses beyond East Washington Boulevard, approximately 650 feet from the Project site.
- East: To the east of the Project site are industrial buildings, a commercial shopping strip along East Washington Avenue, and Interstate 5 (“I-5”).
- South: To the south of the Project site are industrial buildings, the Los Angeles River, and the City of Maywood.
- West: To the west of the Project site are office buildings, I-710, industrial warehouse buildings, and BNSF. The UP Railway is north and west of the Project site.

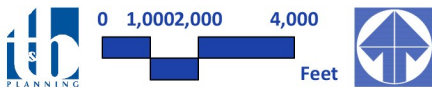
2.4 LOCAL PLANNING CONTEXT

CEQA Guidelines § 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation, and recognize potential inconsistencies. Plans that are applicable to the Project evaluated herein are summarized below, with additional information provided in the applicable resource discussions in Section 4.0, *Environmental Analysis*.

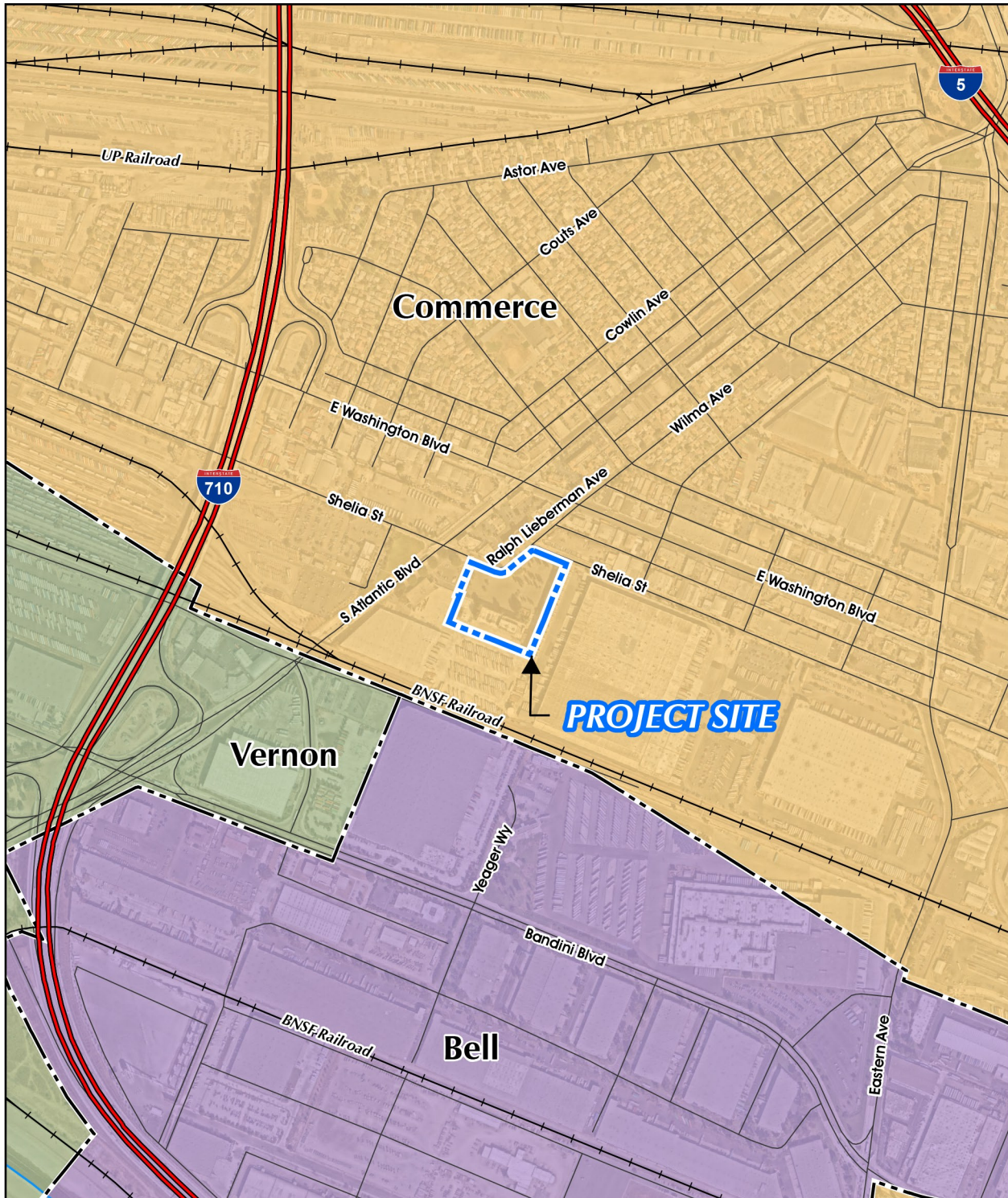


Source(s): ESRI, LA County Portal (2019)

Figure 2-1

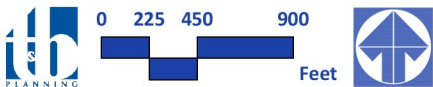


Regional Map

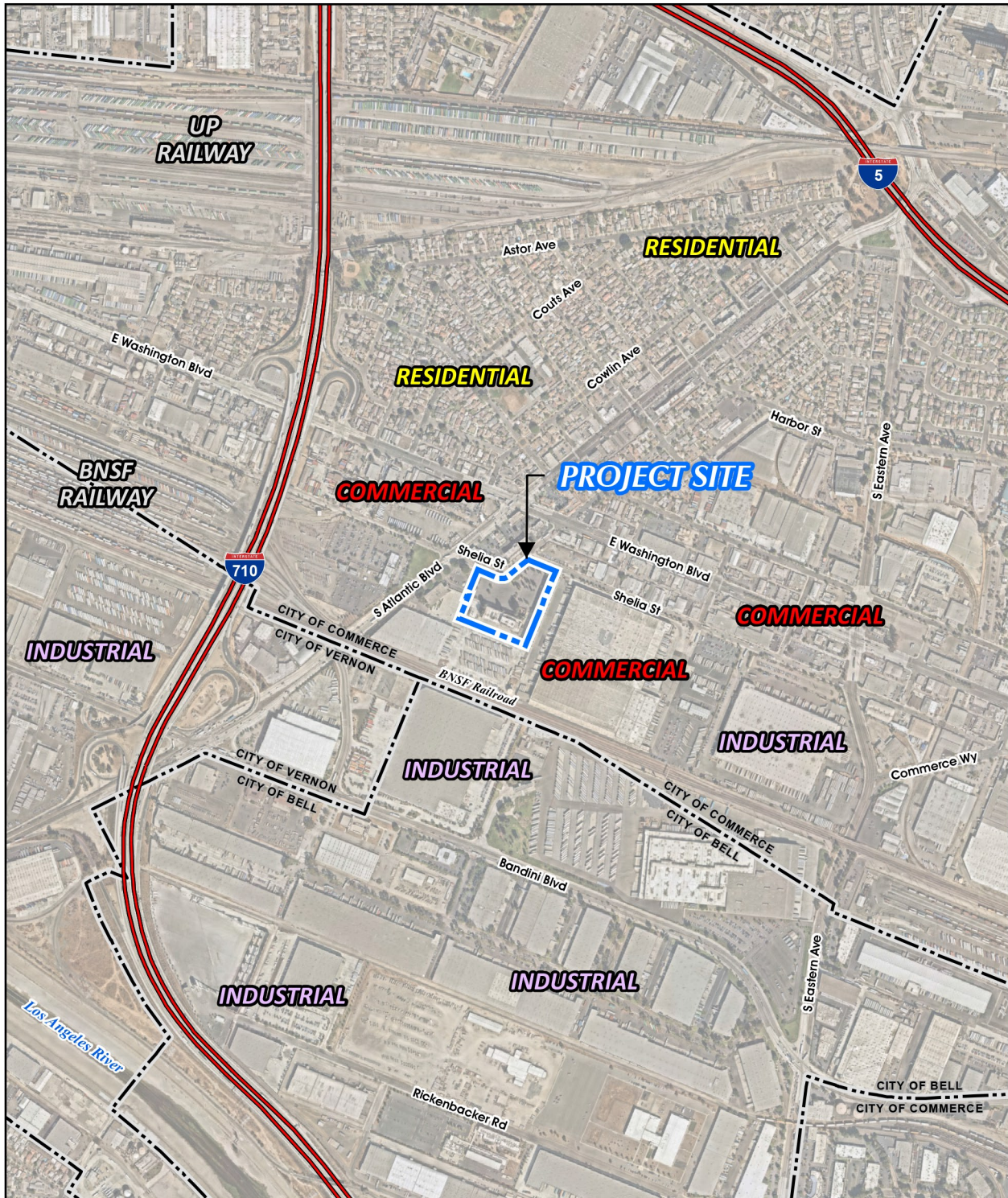


Source(s): ESRI, LA County Portal (2019), Nearmap Aerial (2020)

Figure 2-2

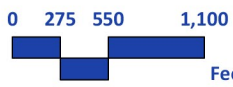


Vicinity Map



Source(s): ESRI, LA County Portal (2019), Nearmap Aerial (2020)

Figure 2-3



Surrounding Land Uses and Development



2.4.2 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. On November 7, 2019, SCAG's Regional Council approved the release of the Draft Connect SoCal plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) for public review and comment. On May 7, 2020, SCAG's Regional Council adopted Connect SoCal for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020. Since the entirety of Connect SoCal has not yet been adopted, the applicable RTP/SCS is the SCAG's 2016-2040 RTP/SCS, which was adopted by SCAG on April 7, 2016. The goals of the 2016-2040 RTP/SCS are to: 1) Align the plan investments and policies with improving regional economic development and competitiveness; 2) Maximize mobility and accessibility for all people and goods in the region; 3) Ensure travel safety and reliability for all people and goods in the region; 4) Preserve and ensure a sustainable regional transportation system; 5) Maximize the productivity of our transportation system; 6) Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking); 7) Actively encourage and create incentives for energy efficiency, where possible; 8) Encourage land use and growth patterns that facilitate transit and active transportation; and 9) Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2016, p. 74; SCAG, 2019)

2.4.3 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AIR QUALITY MANAGEMENT PLAN (AQMP)

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the South Coast Air Basin. In response, and in conformance with California Health & Safety Code § 40702 et seq. and the California Clean Air Act, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The most recent AQMP was adopted by the AQMD Governing Board on March 3, 2017 ("2016 AQMP"). The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2016-2040 RTP/SCS and updated emission inventory methodologies for various source categories. The 2016 AQMP is based on assumptions provided by the Emission factor model (EMFAC) developed by the California Air Resources Board (CARB) for motor vehicle information and assumptions provided by SCAG for demographics. The air quality levels projected in the 2016 AQMP are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in



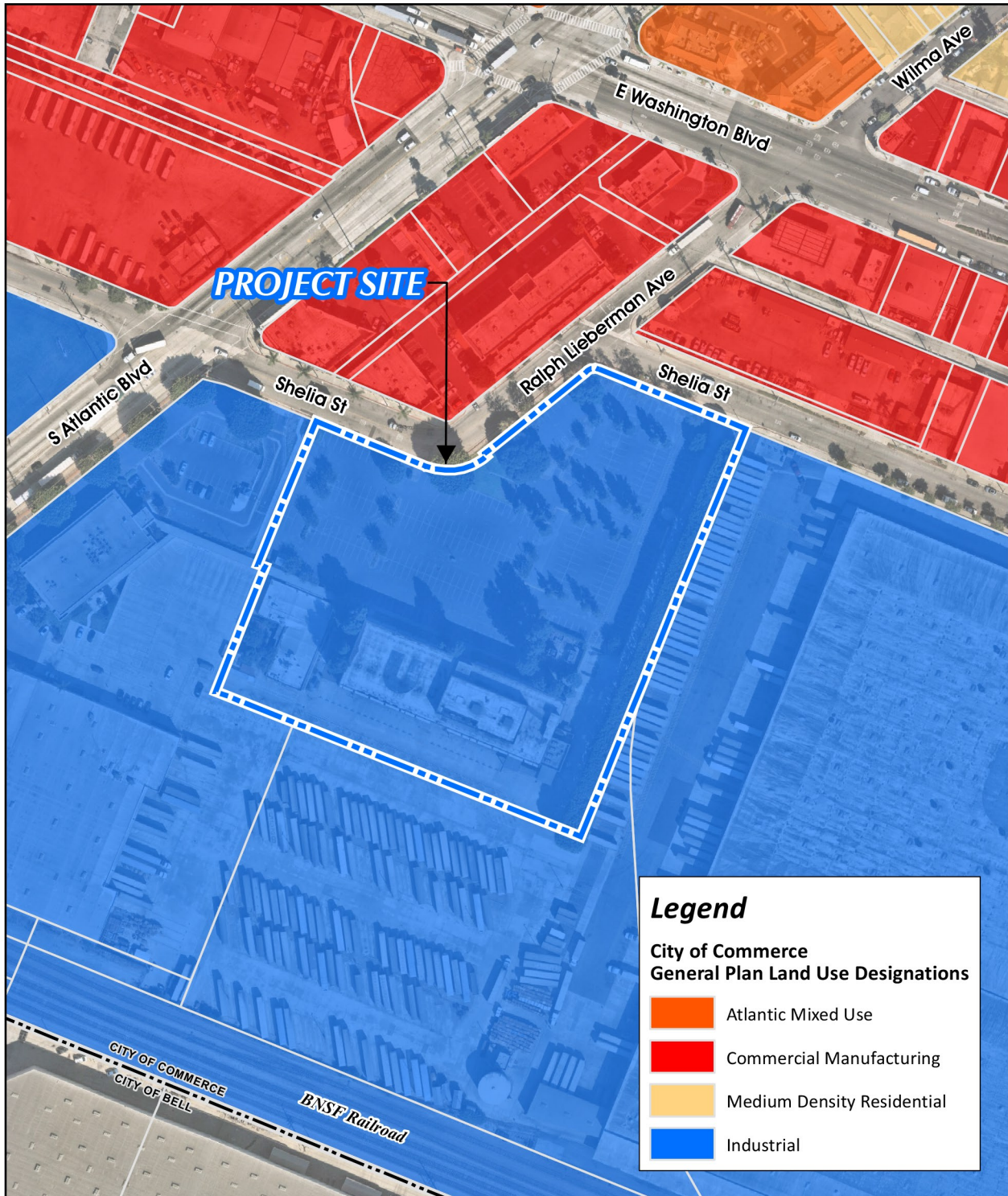
accordance with population growth projections identified by SCAG in its 2016 RTP/SCS. The 2016 AQMP also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (SCAQMD, 2017c)

2.4.4 CITY OF COMMERCE GENERAL PLAN

The prevailing planning document for the Project site and its surrounding area is the City of Commerce General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the Project site is located within the City of Commerce. The General Plan designates the property for “Industrial” land uses, which corresponds to “Light Manufacturing (M-1)” and “Heavy Industrial (M-2)” zones. The Project site is located within the “Commerce Park Planning Area” which is mostly designated for Industrial and Commercial uses. Land use policy encourages the continued presence of all types of industry throughout the planning area.

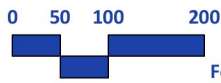
2.4.5 ZONING

As depicted on Figure 2-5, *Existing Zoning Map Designations*, the General Plan also zones the Project site as “Heavy Industrial (M-2).” The M-2 zone is intended to provide safeguards and to establish adequate buffer distances between uses that pose potentially adverse public health, safety, and welfare impacts and land uses in adjacent, more restrictive zone districts (City of Commerce, 2000). Permitted uses within M-2 zones are outlined in Table 19.11.030A of the City of Commerce Municipal Code and include transportation, trucking and warehousing, and professional office and institutional uses.

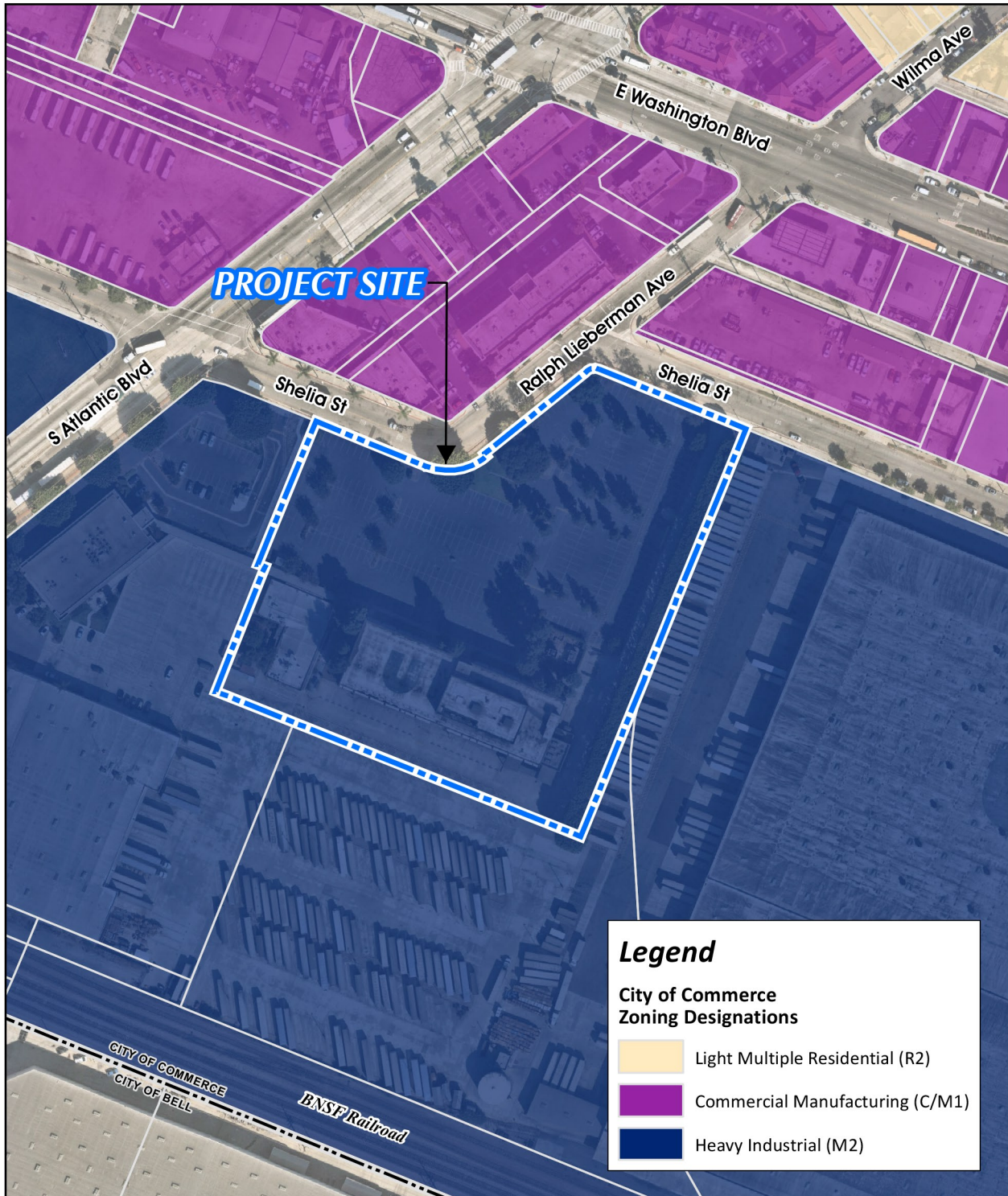


Source(s): City of Commerce (2009), ESRI, LA County Portal (2019), Nearmap Aerial (2020)

Figure 2-4

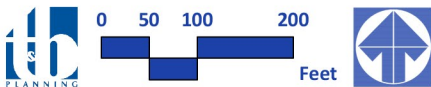


Existing General Plan Land Use Designations



Source(s): City of Commerce (2015), ESRI, LA County Portal (2019), Nearmap Aerial (2020)

Figure 2-5



Existing Zoning Map Designations



2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to CEQA Guidelines § 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on June 12, 2020. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's current physical conditions and surrounding areas are shown on Figure 2-6, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

As shown on Figure 2-6, *Aerial Photograph*, the Project site is developed with one 4-story, 75-foot high, 104,888 square foot (sf) office building, one single story, 17-foot high, 8,065 sf office building at the southern portion of the Project site, and an associated 429 space outdoor parking area. The larger building operates as a commercial office building and the smaller building operates as a cafeteria that serve the office employees. The combined building area of the two buildings is 112,953 sf. Ornamental trees and landscaping exist throughout the parking area and near the buildings, and a guard shack is located at the eastern access point. A road occurs on the east side of the Project site and is present under a recorded easement.

2.5.2 SITE TOPOGRAPHY

The topography of the Project site is relatively flat. The Project site has an average elevation of approximately 146 feet above mean sea level (amsl) with a maximum elevation of approximately 147 feet amsl and a minimum elevation of approximately 144 feet amsl. (Google Earth, 2020).

2.5.3 AIR QUALITY AND CLIMATE

The Project site is located in the 6,745-square-mile South Coast Air Basin (SoCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SoCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and east, and San Diego County to the south. The SoCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SoCAB into conformity with federal and state air quality standards. As documented in the Project's Air Quality Impact Analysis (Appendix B1 to this EIR), although the climate of the SoCAB is characterized as semi-arid, the air near the land surface in the region is quite moist on most days because of the presence of a marine layer. More than 90% of the SoCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SoCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year.



Refer to EIR Subsection 4.1, *Air Quality*, for a more detailed discussion of the Project site's existing air quality conditions.

2.5.4 CULTURAL RESOURCES

The Project site is generally located in south eastern Los Angeles County in the city of Commerce. The Project site has been previously impacted by industrial development since the 1920s. No natural features that are often associated with prehistoric sites, such as bedrock outcroppings or natural sources of water, are visible on aerial photographs or in the vicinity of the Project site. The Project site is located within the Central Basin of the larger Los Angeles Basin. The Project area is underlain by late Pleistocene to possible early Holocene young alluvium.

Refer to EIR Subsection 4.2, *Cultural Resources*, for a more detailed discussion of the Project site's existing cultural resources setting.

2.5.5 GEOLOGY AND SOILS

The Project site's geotechnical characterization identifies four stratification boundaries within the Project site. Stratum I consists of asphalt approximately 3 to 3.5 inches thick and Stratum Ia consists of concrete approximately 6.5 to 7 inches thick. Stratum II consists of base approximately 3 to 7.5 inches thick. Stratum III consists of fill to a depth of approximately 1 to 5 feet. Stratum IV consists of interbedded silty sand, sand silt, and sandy silty clay to an approximate depth of 51.5 feet.

Refer to EIR Subsection 4.4, *Geology and Soils*, for a more detailed discussion of the Project site's existing soil conditions and paleontological resources.

2.5.6 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).

In 2019, the statewide GHG emissions inventory was updated for 2000 to 2017 emissions using the global warming potential (GWP) in IPCC's Fourth Assessment Report. Based on these GWPs, California produced 424.10 MMTCO₂e GHG emissions in 2017. California's transportation sector was the single largest generator of GHG emissions, producing 40.1 percent of the state's total emissions. Industrial sector emissions made up 21.1 percent, and electric power generation made up 14.7 percent of the state's emissions inventory. Other major sectors of GHG emissions include



commercial and residential (9.7 percent), agriculture and forestry (7.6 percent) high GWP (4.7 percent), and recycling and waste (2.1 percent) (CARB 2019a).

California's GHG emissions have followed a declining trend since 2007. In 2017, emissions from routine GHG emitting activities statewide were 424 MMTCO₂e, 5 MMTCO₂e lower than 2016 levels. This represents an overall decrease of 14 percent since peak levels in 2004 and 7 MMTCO₂e below the 1990 level and the state's 2020 GHG target. During the 2000 to 2017 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 14.0 MTCO₂e per capita to 10.7 MTCO₂e per capita in 2017, a 24 percent decrease. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product (GDP)) is declining, representing a 41 percent decline since the 2001 peak, while the state's GDP has grown 52 percent during this period. For the first time since California started to track GHG emissions, California uses more electricity from zero-GHG sources (hydro, solar, wind, and nuclear energy). (CARB 2019b).

Refer to EIR Subsection 4.5, *Greenhouse Gas Emissions*, for a more detailed discussion of the Project site's existing greenhouse gas conditions.

2.5.7 HAZARDS AND HAZARDOUS MATERIALS

A historical review of the Project site included review of aerial photographs, fire insurance maps, United States Geological Services (USGS) topographic maps, local street directories, and field reconnaissance. The Project was developed with numerous offices and laboratories occupied by the Fluor Corporation from the 1940s through 1960 and a cafeteria building for the Santa Fe Railroad Company from the 1960s to 1980s. The Project was redeveloped with the cafeteria building and food warehouse in 1957 and 1965, respectively. From the 1950s through the 1990s there were additional buildings on the northern portion of the Project. The Project has been occupied by Unified Western Grocers since 1989. The two Project buildings were substantially renovated in 1999. No evidence of petroleum exploration or production was identified.

The Project site is approximately 9.2 miles south west of the San Gabriel Airport (SGA), is not within the SGA's sphere of influence, and is not located within a high fire severity zone or wildfire hazard zone.

Refer to EIR Subsection 4.6, *Hazards and Hazardous Materials*, for a more detailed discussion of the Project site's existing

2.5.8 NOISE

Prominent existing noise sources in the Project area will be roadway activity along South Atlantic Boulevard and East Washington Boulevard. Additional nearby noise sources would include those emanating from the nearby industrial use facilities. Existing sources of noise in the greater Project area



would include the I-710 Freeway to the west, the I-5 Freeway to the east, and the two rail train depots to the west and north west.

Refer to EIR Subsection 4.7, *Noise*, for a more detailed discussion of the Project site's existing noise conditions.

2.5.9 TRANSPORTATION

Regional access to the Project site is provided by I-710 is located approximately 0.3 miles east of the Project site, I-5 approximately 0.7 miles to the northeast, and I-105 approximately 6.2 miles south of the Project site. Direct access to the Project site is currently available from Sheila Street which is accessible by the nearby intersection of Sheila Street and South Atlantic Boulevard.

The Project area is currently served by the City of Commerce Transport Department (CTD) which provides bus transportation services within the City of Commerce and into Downtown Los Angeles. Bus stops near the Project site include two bus stops at South Atlantic Boulevard East Washington Boulevard, approximately 0.10 miles to the north. The following transit routes serve the Project site: Blue Route; Citadel Outlets Express; Orange Route; and Red Route (CTD, 2020).

There are no pedestrian or bicycle facilities constructed on the Project site. The nearest off-site pedestrian sidewalks are located along Sheila Street, South Atlantic Boulevard, and East Washington Avenue. There are no designated bike paths on any street in the Project area.

Refer to EIR Subsection 4.8, *Transportation*, for a more detailed discussion of the Project site's existing transportation setting.

2.5.10 TRIBAL CULTURAL RESOURCES

The Project site is located within the eastern portion of the City of Commerce within Los Angeles County, California. According to the earliest available ethnographic data, the Gabrielino (Tongva) were the major tribe established in the Project area as of the late Holocene period (circa 3,000 YBP). (BFSA, 2019a) Fossil records and other evidence indicates human presence in coastal southern California region from as far back as 26,000 years ago.

Refer to EIR Subsection 4.9, *Tribal Cultural Resources*, for a more detailed discussion of the Project site's existing tribal cultural resources.

2.5.11 PUBLIC FACILITIES

Fire prevention services are provided by the Los Angeles County Fire Department (LACFD). The services offered by LACFD include firefighting, paramedic and first aid treatment, hazardous material response, and emergency preparedness coordination. There are three stations serving the City of Commerce; Station 22 – 928 South Gerhart Street, Commerce; Station 27 – 6031 Rickenbacker Road,



Commerce; and Station 50 – 2327 South Saybrook Avenue, Commerce. Commerce has maintained a contract with the LACFD since incorporation, and the City’s overall fire protection rating is very good.

The closest fire stations to the Project site are LACFD Fire Station 27 on Rickenbacker Road (approximately 1.12 miles south east), and Fire Station Number 50 on Saybrook Avenue (approximately 1.51 miles east). In addition to these stations, resources and personnel may be dispatched from other LACFD stations, as necessary, to respond to fire and emergency calls.

Police protection services are provided to the City of Commerce by the Los Angeles County Sheriff’s Department (LACSD). The City of Commerce is served by the 5019 East Third Street in East Los Angeles (approximately 2.33 miles south of the Project site).

The City of Commerce is serviced by the Montebello Unified School District (MUSD). Rosewood Park School serves grades K-8 and Bell Gardens High School serves grades 9-12. There are no residences currently located on the Project site.

Major public park facilities within the Project vicinity include the following: Bandini Park located 0.4 miles north east of the Project site, Rosewood park located 0.7 miles east of the Project site, and Maywood Riverfront Park located 1.1 miles South of the Project site.

Public libraries within the Project vicinity include the following: Bandini Neighborhood Library located 0.4 miles north east of the Project site, Rosewood Neighborhood Library located 0.7 miles east of the Project site, and Bristow Neighborhood Library located 0.9 miles north of the Project site.

2.5.12 UTILITIES AND SERVICE SYSTEMS

The Project site is currently developed with two buildings totaling 112,953 sf, which are currently served by existing water, wastewater, and stormwater drainage infrastructure, as well as other dry utilities.

A. Water Service

The Project would be served with potable water from the Central Basin Municipal Water District (CBMWD). Residential, commercial, and industrial water services are provided by California Water Service Company throughout the City of Commerce.

B. Sewer Service

The County Sanitation Districts maintain and operate the sewer system in the City of Commerce. The Project site is served by the Los Angeles County Sanitation District No. 2. Sewer lines are maintained by the County Department of Public Works with sewage from the City conveyed through sewer mains into the Joint Water Pollution Control Plant (JWPCP) in Carson.



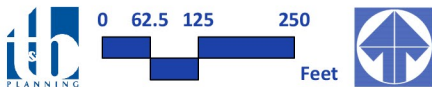
C. Solid Waste Services

Solid waste generated onsite is collected by the Republic Services, Inc. or other private waste haulers and is hauled to Sunshine Canyon Landfill. Sunshine Canyon Landfill is permitted to receive 12,100 tons of solid waste per day and accepts approximately 8,300 tons of waste daily. (Cal Recycle, 2020).



Source(s): ESRI, LA County Portal (2019), Nearmap Aerial (2020)

Figure 2-6



Aerial Photograph



3.0 PROJECT DESCRIPTION

This section will provide all of the information required for an EIR Project Description by CEQA Guidelines § 15124, including a description of the Project’s precise location and boundaries; a statement of the Project’s objectives; a description of the Project’s technical, economic, and environmental characteristics; and a description of the intended use of this EIR, including a list of the government agencies that are expected to use this EIR in their decision-making process; a list of the permits and approvals that are required to implement the project; and a list of related environmental review and consultation requirements.

3.1 REGIONAL SETTING

The approximate 5.6-acre Project site (“Project site”) is located within northeastern portion of the City of Commerce, California. Previous *Figure 2-1* depicts the Project site’s location within the regional vicinity. As shown, the City of Commerce is located approximately 6 miles southeast of downtown Los Angeles and is bounded by the City of Montebello to the east, unincorporated East Los Angeles on the north, and the City of Bell Gardens on the south. The City of Commerce is located in southeast Los Angeles County which abuts Kern County to the north; San Bernardino County to the east; Orange County to the south; and Ventura County to the west.

3.2 PROJECT LOCATION AND SETTING

The Project site that is the subject of this EIR is located within the City of Commerce, east of Interstate 710 (I-710) and South Atlantic Boulevard, south of Sheila Street and north of the Metrolink railroad, at 5200 Sheila St, Commerce, CA 90040 (Assessor’s Parcel Number [APN] 6335-007-021). Under existing conditions, the Project site contains two buildings, a guard shack, a 429-space outdoor parking area, and ornamental trees and landscaping. The larger office building on the south portion of the Project site is four-stories, 75-feet high, and 104,888 square feet (sf). The smaller building on west portion of the Project site, used as a cafeteria, is one-story, 17-feet tall, and 8,065 sf. The combined footage of the two existing buildings is 112,953 sf.

3.3 PROPOSED PROJECT

The Project Applicant is processing a Plot Plan and Development Plan Review for the 5200 Sheila Street Project (“Project”) to redevelop the Project site with a modern, 114,898 sf speculative warehouse and office building with 17 loading docks on the south side of the building, as shown on *Figure 3-1, Site Plan*. Of the total square footage of the building, the Project would allocate 100,898 sf for warehousing and 14,000 sf for office uses. Additionally, the Project would include 13,786 sf of landscaping and surface parking. The Project would require the demolition of the existing buildings totaling 112,953 sf.



The Project would be developed in compliance with applicable provisions of the City's Municipal Code, including established development standards. A description of the following components of the Project is provided below:

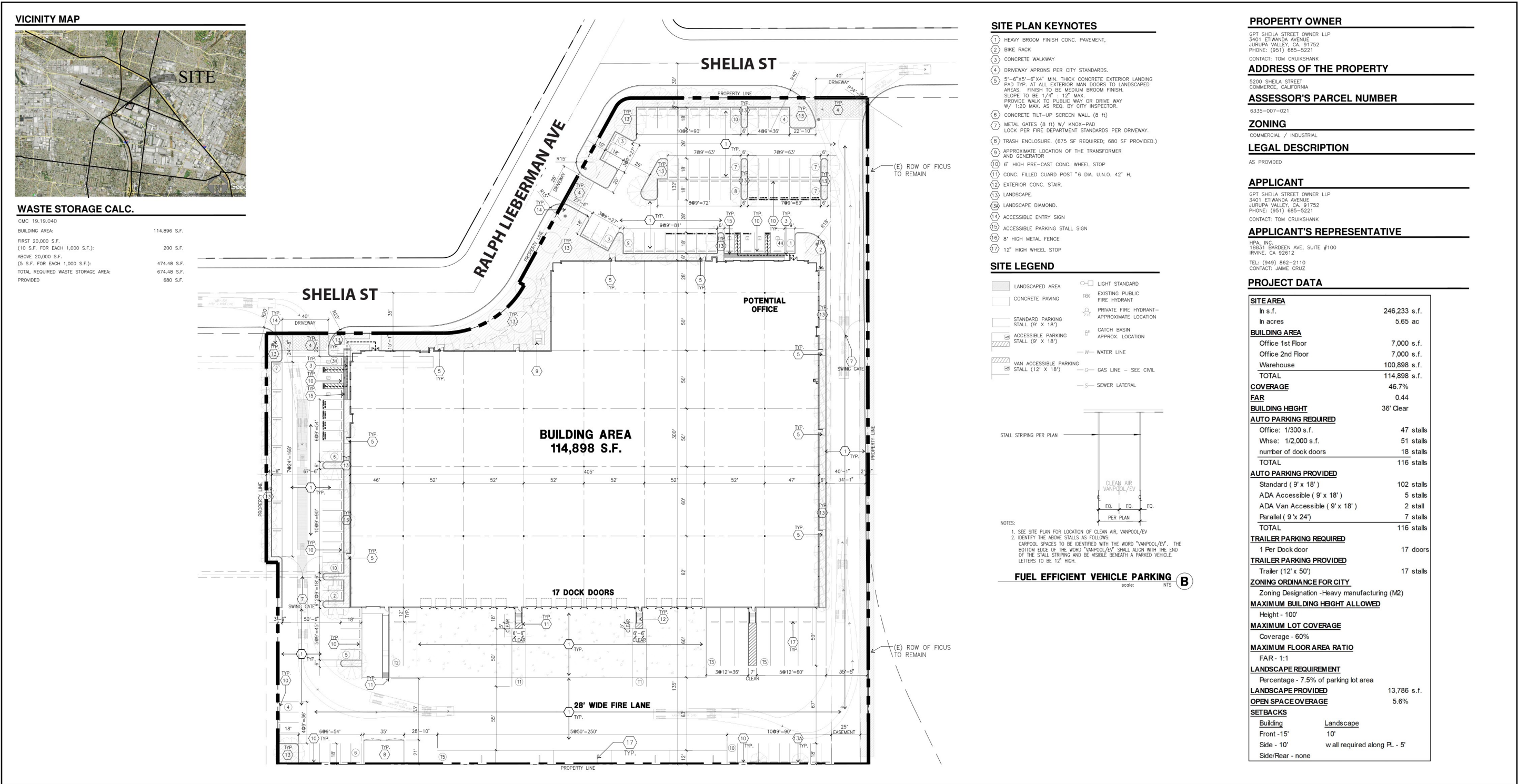
- Building Characteristics and Operations
- Traffic, Circulation, and Parking
- Landscaping, Walls, and Lighting

3.3.1 BUILDING CHARACTERISTICS AND OPERATIONS

As depicted in *Figure 3-2, Building Elevations*, the proposed building would be a one-story, 41-foot tall speculative warehouse and office building. For purposes of evaluation and to allow the flexibility for future users, the Project is assumed to be operational 24 hours per day, seven days per week. The Project building would be designed, constructed, operated, and/or maintained in accordance with Leadership in Energy and Environmental Design (LEED). The Project Applicant anticipates that the building would receive between 40-49 points and qualify for a certification level of "Certified."

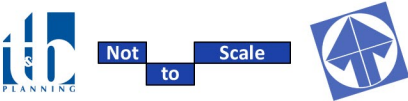
The building has been designed to be visually compatible with the adjacent buildings. There are three aesthetic styles present on the north elevation which eliminates the appearances of "sameness" or "flat" from the publicly visible elevation. The first aesthetic style is present in the center segment of the north elevation, and would be painted with a two-tone color gradient on the gray scale with the lighter portions towards the sky. This segment would be given relief by a series of tempered spandrel glass windows with an accompanied painted metal awning. The building is recessed 28 feet south near the center of the building, offset slightly to the east. This area would be detailed with a window in the lower portion of this segment and accented by a metal awning with exposed wood paneling.

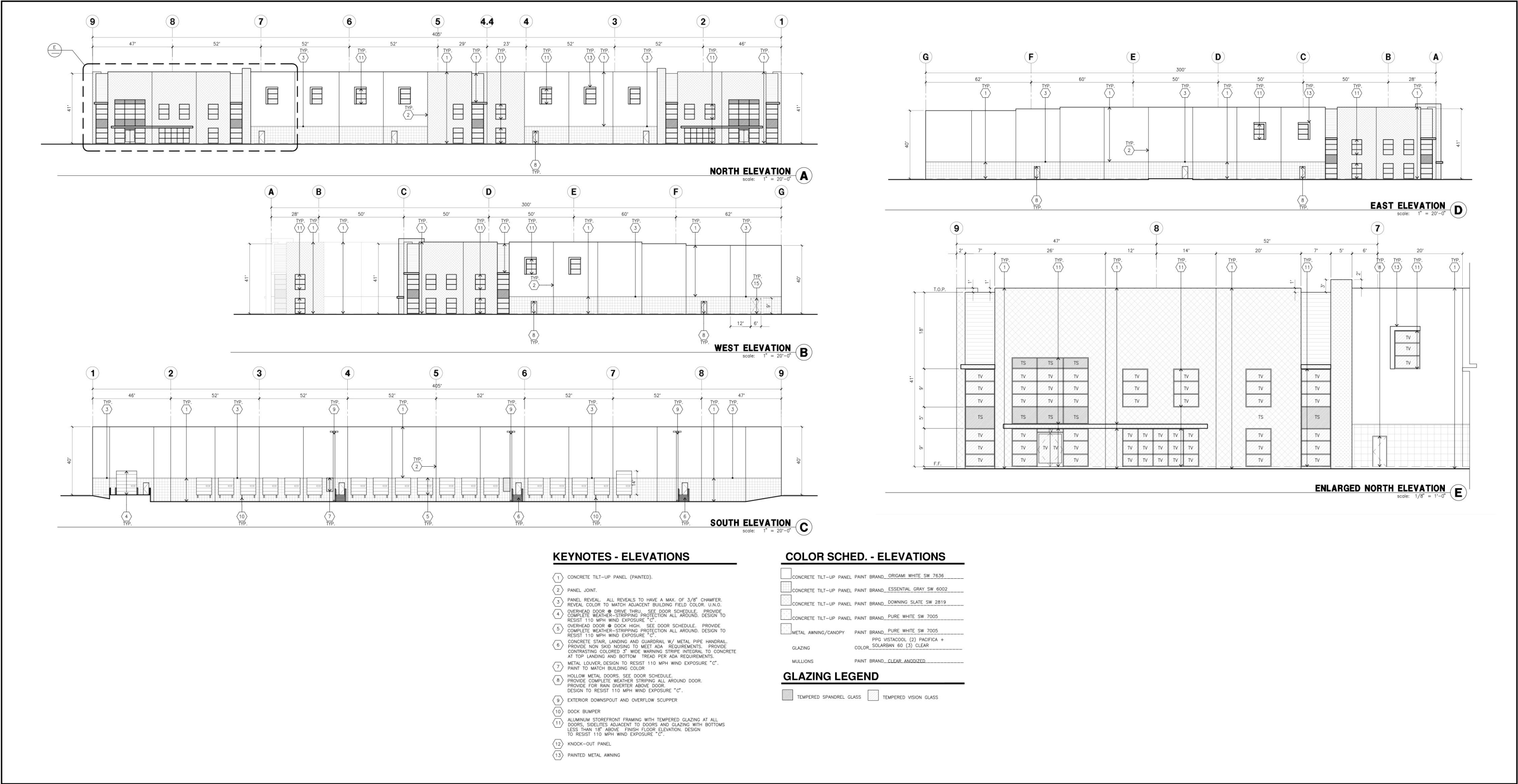
The second aesthetic style is present on both sides of the north elevation which gives pedestrians a clear indication of the entryways and establishes the elevation's depth and variety. The building would be painted a darker gray in these segments, and there are a higher number of windows halfway up the length of the building. *Figure 3-2* also depicts the variation on the horizontal parapet portions of the roof which provides further depth to the building. The east and west elevation would display simplified aesthetic themes seen on the north elevation. The north elevation's darker aesthetic style would wrap around to the east elevation of the structure where the proposed two-story office area would be located. The darker aesthetic style would also be present on the west elevation; however, it would not wrap from the north elevation. Also depicted in *Figure 3-2*, the south elevation exhibits less aesthetic variation and high logistical utility. At the south elevation, facing away from public viewpoints, the structure would install 17 dock doors and 1 drive through door. Loading and unloading activities would be at to the rear of the building out of view from the public right-of-way.



Source(s): HPA (01-30-2020)

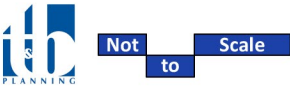
Figure 3-1





Source(s): HPA (01-30-2020)

Figure 3-2





3.3.2 TRAFFIC, CIRCULATION AND PARKING

A. Traffic

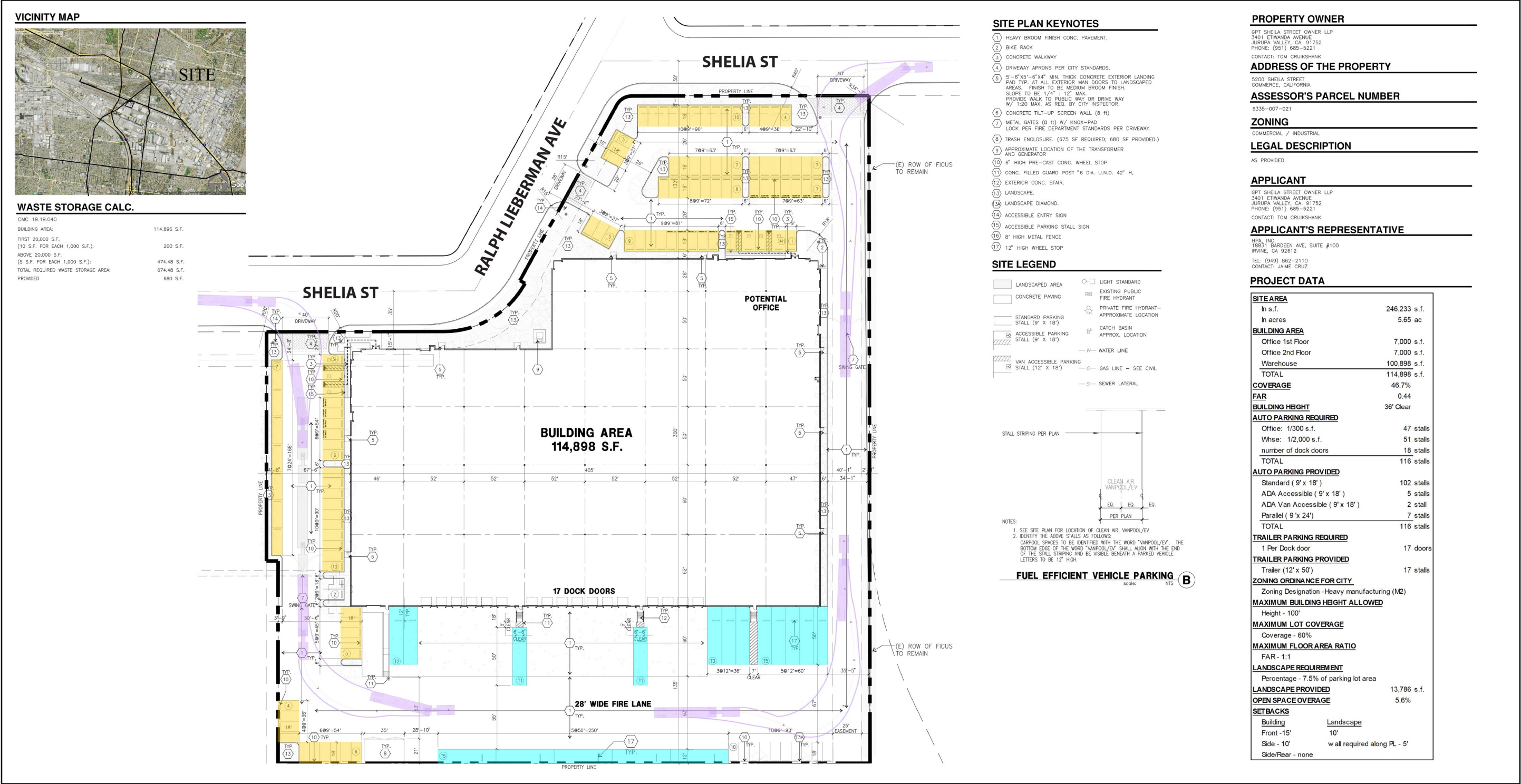
Based on a Project-specific analysis conducted by Urban Crossroads, Inc. (EIR Appendix I1), and as discussed in Subsection 4.8, *Transportation*, to this EIR, the proposed Project is estimated to result in a total of 352 daily trips with 43 trips in the morning peak hour and 41 trips in the PM peak hour. (Urban Crossroads, 2020, Table 4).

B. Vehicle Circulation

Access to the Project site would be provided by three driveways along Sheila Street to the north. As depicted in *Figure 3-3, Circulation Plan*, the Project would provide three points of access to the site along Sheila Street and Ralph Lieberman Avenue. The first access point would be located at the northwest corner near the edge of the property line on Sheila Street. This access point would be the primary entryway for truck traffic into the Project site in order to reach the loading docks on the southern elevation, and would permit entrance from vehicles traveling from either direction of Sheila Street. Truck traffic would follow the perimeter of the proposed building, near the Project site boundary, along the western, southern, and eastern edges of the building. Egress from the Project site is made possible by the second access point located at the northeast corner near the edge of the property line on Sheila Street. Vehicles exiting this location would be permitted to enter into either direction of Sheila Street. A third access point would provide access from Ralph Lieberman Avenue which briefly interrupts Sheila Street as it travels east and west. The Ralph Lieberman Avenue access would allow for ingress and egress for office employees.

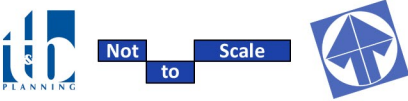
C. Parking

Truck trailer parking spaces (17 total) would be provided within the truck courts/loading areas on the south side of the building. The Project includes aboveground surface automobile parking with 116 parking spaces along the northern, southern, and western boundaries of the Project side, with a larger surface parking area located north of the Project building. Of the 116 spaces, 102 stalls would be designated as standard, 11 stalls would be designated clean air vehicle, 7 stalls would be designated as parallel, 5 stalls would be designated as EV standard, and 7 stalls would be designated Americans with Disabilities Act (ADA) accessible. The largest parking area would be located to the northeast of the proposed building, with the remaining parking areas to the south and west of the proposed structure. The Project would also install two bike racks at the northeast and southwest corners of the building.



Source(s): HPA (01-30-2020)

Figure 3-3





D. Landscaping and Lighting

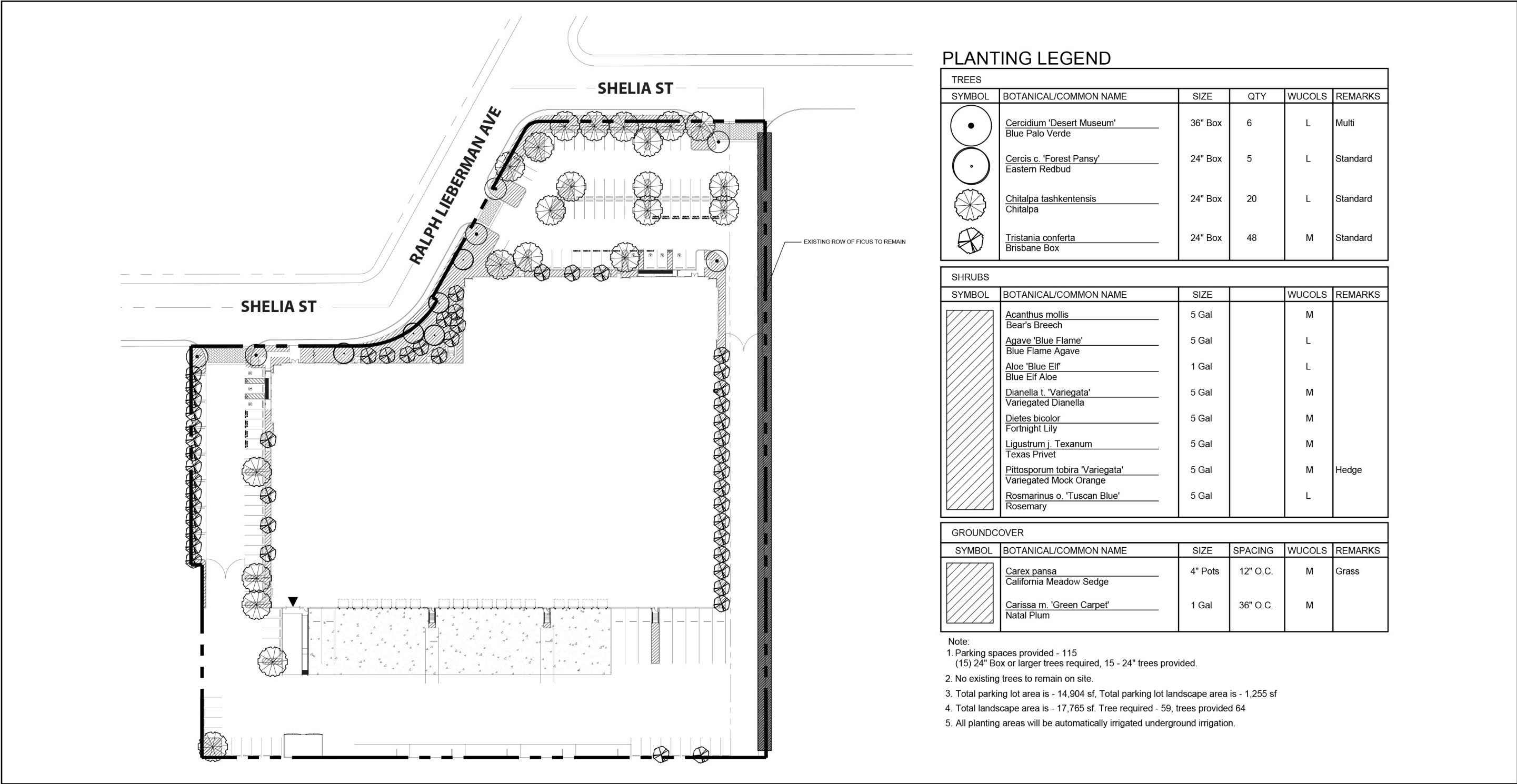
As depicted on *Figure 3-4, Landscape Plan*, the Project would include 13,786 square feet of landscaping. The adjoining street and all parking areas would be landscaped with a planter strip along the perimeter of the property, except for areas where pedestrian crosswalks and driveways are provided. The minimum width of the parking perimeter landscaping between the street right-of-way and parking area would be 10 feet. As a standard condition of approval, any landscaping/hardscape within the limited use area would not exceed 30-inches (2.5-feet) in height to prevent sighting obstructions for vehicular and pedestrian traffic. The limited use area would be kept clear of any landscaping or any other obstructions that may impede the visibility of the driver, including on-street parking. Minimum horizontal sight distances would be re-evaluated in the field once the driveway has been constructed. A minimum of one tree would be provided for every eight parking spaces, and would be planted to provide uniform shade and coverage. An additional one tree shall be provided for every three hundred square feet of landscaped area. All trees would be of a minimum 24-inch box size.

Exterior lighting would be installed on-site as necessary for safety, security, and wayfinding. Decorative architectural lighting as well as landscape lighting would also be installed to accent building entries as focal points throughout the site. Exterior loading and parking areas would also be illuminated at night. Lighting would be subject to compliance with all applicable Commerce Municipal Code sections, including Chapter 19.19.130 which requires: lighting at entryways, along walkways, between buildings, and within parking areas; lighting shall not exceed the maximum permitted building height or twenty-five feet, whichever is less; lighting be of a minimum candle power to accomplish the purpose of the light; lighting shall not flicker; and lighting shall not be located in buffer areas except as to illuminate pedestrian walkways.

3.4 PROJECT CONSTRUCTION DETAILS

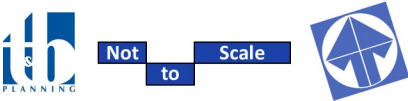
A. Proposed Physical Disturbances

For the purposes of analysis throughout this EIR, it is assumed that implementation of the Project would result in disturbance to the entire 5.6-acre Project site. Additionally, the Project would result in temporary impacts to site-adjacent areas during construction. The Project would not result substantial off-site disturbances, such as modifications to water, sewer, and roadway facilities. The demolition of the existing structure would generate 3,160 tons of asphalt that would be pulverized and left in place and 8,500 tons of concrete crushed and reused on site. The conceptual grading plan indicates that the Project site will require 9,782 cubic yards (CY) of cut and 9,900 CY of fill, requiring 118 CY of imported fill.



Source(s): Hunter Landscape (01-30-2020)

Figure 3-4





B. Timing of Construction Activities

Construction is expected to commence in February 2021 and will last through July 2022. For analytical purposes, the number of days for each construction phase will be based on CalEEMod default settings, which are based on empirical data collected by air pollution regulators. The anticipated duration of each phase of construction is identified in Table 3-1, *Construction Activity Phases and Durations*.

Table 3-1 Construction Activity Phases and Durations

Phase Name	Days
Demolition	90
Site Preparation	10
Grading	20
Building Construction	230
Paving	20
Architectural Coating	20

C. Anticipated Construction Equipment

For analytical purposes, the construction equipment list will be based on CalEEMod default settings, which are based on empirical data collected by air pollution regulators. The anticipated construction equipment requirements are identified in Table 3-2, *Construction Equipment Requirements*.

Table 3-2 Construction Equipment Requirements

Activity	Equipment	Number	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	3	8
	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
Building Construction	Crawler Tractors	1	8
	Cranes	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
	Paving Equipment	2	8
	Rollers	2	8



Activity	Equipment	Number	Hours Per Day
Architectural Coating	Air Compressors	1	8

3.5 STATEMENT OF OBJECTIVES

The fundamental purpose and goal of the Project is to accomplish the orderly development of an appropriately zoned and designated warehouse building in the City of Commerce which can benefit from the nearby railyard facilities while also contributing to increased employment opportunities within the area. The project objectives have been refined throughout the planning and design process for the proposed Project and are listed below:

- Create a professional, well-maintained and attractive environment for the development of a warehouse building consistent with the underlying zoning adjacent to nearby transportation infrastructure such as the SR-710 and I-5 Freeways.
- Provide the entitlements and framework for the development of warehouse and office uses that are responsive to local, national, and international trade demands.
- Provide development that will enhance the City's economic well-being and employment opportunities for community residents.
- Facilitate a project that provides goods to the regional economy.

3.6 SUMMARY OF REQUESTED ACTIONS

The City of Commerce has primary approval responsibility for the proposed Project. As such, the City serves as the Lead Agency for this EIR pursuant to CEQA Guidelines § 15050. The role of the Lead Agency was previously described in detail in Section 1.0 of this EIR. As part of the approval process for the proposed Project, the City's Planning Commission will hold a public hearing to consider the certification of the EIR. The Planning Commission will decide whether to approve, approve with changes, or deny this Project. The anticipated approvals required for the project are summarized below:

- Certification of the 5200 Sheila Street Project Environmental Impact Report
- Adoption of the Mitigation Monitoring and Reporting Program
- Approval of a Plot Plan and Development Plan Review



4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

In accordance with CEQA Guidelines §§15126–15126.4, this EIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulatively considerable impacts that could occur from planning, constructing, and operating the proposed Project.

In compliance with the procedural requirements of CEQA, the City of Commerce prepared an Initial Study (Appendix A) to determine the scope of environmental analysis for this EIR. Public comment on the scope of this EIR consisted of written comments received by the City of Commerce in response to the NOP; the City received no comments from members of the public at the EIR scoping meeting held on June 24, 2020. Taking all known information and public comments into consideration, nine (9) primary environmental subject areas are evaluated in this Section 4.0, as listed below. Each subsection of this Section 4.0 evaluates several specific subject matters related to the general topic of the subsection. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein. Environmental issues and their corresponding sections are:

4.1	Air Quality	4.6	Hazards & Hazardous Materials
4.2	Cultural Resources	4.7	Noise
4.3	Energy	4.8	Transportation
4.4	Geology and Soils	4.9	Tribal Cultural Resources
4.5	Greenhouse Gas Emissions		

Subsections 4.1 through 4.9 provide analysis of impacts for those environmental topics where it was determined that the Project could result in “potentially significant impacts.” Each topical section includes the following information:

- A description of the existing setting including a discussion of the regulatory framework, if applicable.
- Identification of thresholds of significance.
- Analysis of potential Project effects.
- Identification of additional Project-specific mitigation measures, if required, to reduce the identified Project impacts.
- Identification of the level of significance of impacts after mitigation, including unavoidable significant adverse impacts.
- Evaluation of potential cumulative impacts.



The Initial Study (Appendix A) also determined that certain issues under an environmental topic would not be significantly affected by implementation of the project (see Section 5.4 of this EIR). These issues are not discussed further in this EIR and include:

- Aesthetics
- Agricultural and Forestry Resources
- Biological Resources
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

4.0.1 ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under nine major headings:

- Existing Conditions
- Regulatory Framework
- Methodology
- Basis for Determining Significance
- Impact Analysis
- Cumulative Impact Analysis
- Significance of Impacts Before Mitigation
- Mitigation
- Significance After Mitigation

In addition, Section S.0, *Executive Summary*, summarizes all impacts by environmental issue.

4.0.2 TERMINOLOGY USED IN THIS EIR

The level of significance is identified for each impact in this EIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would not change the environment.



- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Significant impact.** A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

Each Subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- **Less than significant with mitigation incorporated.** A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).
- **Significant and unavoidable.** A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to the Project's impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

4.0.3 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone. Section 15355 of the Guidelines defines cumulative impacts as "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts represent the change caused by the incremental impact of a project when added to other proposed or committed projects in the vicinity.

The CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of two sources:

- A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.*
- A summary of projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions.*



The cumulative impact analysis in this EIR uses both Method A and Method B. Method B uses the City of Commerce's comprehensive General Plan and Land Use Element, which were adopted by the Commerce City Council in January of 2008. Cumulative impact analyses will use the projections in the long-range planning documents—such as Commerce's General Plan, Southern California Association of Governments' in its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and South Coast Air Quality Management District's 2016 Air Quality Management Plan (AQMP). This information was supplemented with a list of related projects (Method A), described in detail below.

The potential build out under the General Plan's implementation is indicated in Table 4.0-1, *Development Intensity*. While total buildout of the General Plan would result in 5,240 residential units, the 2019 SCAG local profile for the City of Commerce indicated that there were 3,472 residential units within the city as of 2018.

Table 4.0-1 Development Intensity

Land Use	Area (acres)	Intensity Standard	Theoretical Development
Low-Density Residential	151	0-11 du/acre	1,661 units
Medium-Density Residential	93	0-17 du/acre	1,581 units
High-Density Residential	74	0-27 du/acre	1,998 units
Mixed Use	21	0-27 du/acre	567 units
Housing Opportunity Overlay	44	0-27 du/acre	1,188 units
Commercial	216	0.5 FAR	4,704,570 sf
Commercial/Manufacturing	93	1.0 FAR	4,051,070 sf
Commercial/Entertainment	95	4.0 FAR	2,009,100 sf
Manufacturing	2,558	4.0 FAR	55,713,240 sf
Public Facilities	200	4.0 FAR	435,600 sf
Transportation	706	--	--
Total Residential (units)			5,240 units
Total Non-Residential (sf)			66,913,600 sf

Cumulative impact analyses for several topical sections are also based on the most appropriate geographic boundary for the respective impact. For example, cumulative air quality impacts are based on the South Coast Air Basin (SCAB), which includes other jurisdictions besides the City of Commerce. The approach is further discussed below and in each respective topical section. Several potential cumulative impacts that encompass regional boundaries (e.g., air quality, greenhouse gases, traffic) have been addressed in the context of various regional plans and defined significance thresholds. Following is a summary of the approach and extent of cumulative impacts, which is further detailed in each topical environmental section.

- **Air Quality.** Air quality impacts are based on the regional boundaries of the South Coast Air Basin.



- **Cultural Resources.** Cultural resources impacts are site specific and generally do not combine to result in cumulative impacts. The cumulative analysis of historical resources includes the Project site and immediately surrounding area.
- **Energy.** Energy impacts are based on the service areas of Southern California Edison and SoCalGas.
- **Geological Resources.** Geologic and soils impacts are site specific and generally do not combine to result in cumulative impacts. However, the cumulative analysis considers the Project site and nearby related projects (see Table 4.0-2).
- **Greenhouse Gas (GHG) Emissions.** Potential GHG impacts are not bounded by geography but affect global climate change. The assessment of cumulative GHG impacts, therefore, is based on consistency with South Coast AQMD's GHG emissions threshold to achieve targeted reductions.
- **Hazards and Hazardous Materials.** Cumulative analysis highlights the regulatory requirements related to the storage, handling, and use of hazardous substances. Project impacts, however, are site specific, and generally would not combine with impacts of other projects to result in cumulatively considerable impacts. However, the cumulative analysis considers the Project site and nearby related projects (see Table 4.0-2).
- **Noise.** Cumulative traffic noise is assessed relative to applicable City General Plan noise-level standards and considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site. The study area is aligned with the traffic study area.
- **Transportation and Traffic.** The traffic study considers both project-specific impacts and the project's cumulative contribution to traffic in the project vicinity. The proposed Project falls under the VMT impact thresholds, and the cumulative traffic analysis reviews State and regional long-term VMT and GHG reduction goals.
- **Tribal Cultural Resources.** Considers Native American territory that includes the project site and surrounding area, as provided by the Native American Heritage Commission.

4.0.4 RELATED PROJECTS

The list of related projects was prepared based the Project's Traffic Impact Analysis (Appendix I1) and uses data from the cities of Commerce, Los Angeles, Monterey Park, Montebello, Vernon, Huntington Park, Bell Gardens, Bell, and Maywood, and the County of Los Angeles. A total of 63 cumulative projects were identified in the study area for the traffic study, shown on Table 4.0-2,



Cumulative Development Land Use Summary, and Figure 4.0-1, Cumulative Development Location Map.

Table 4.0-2 Cumulative Development Land Use Summary

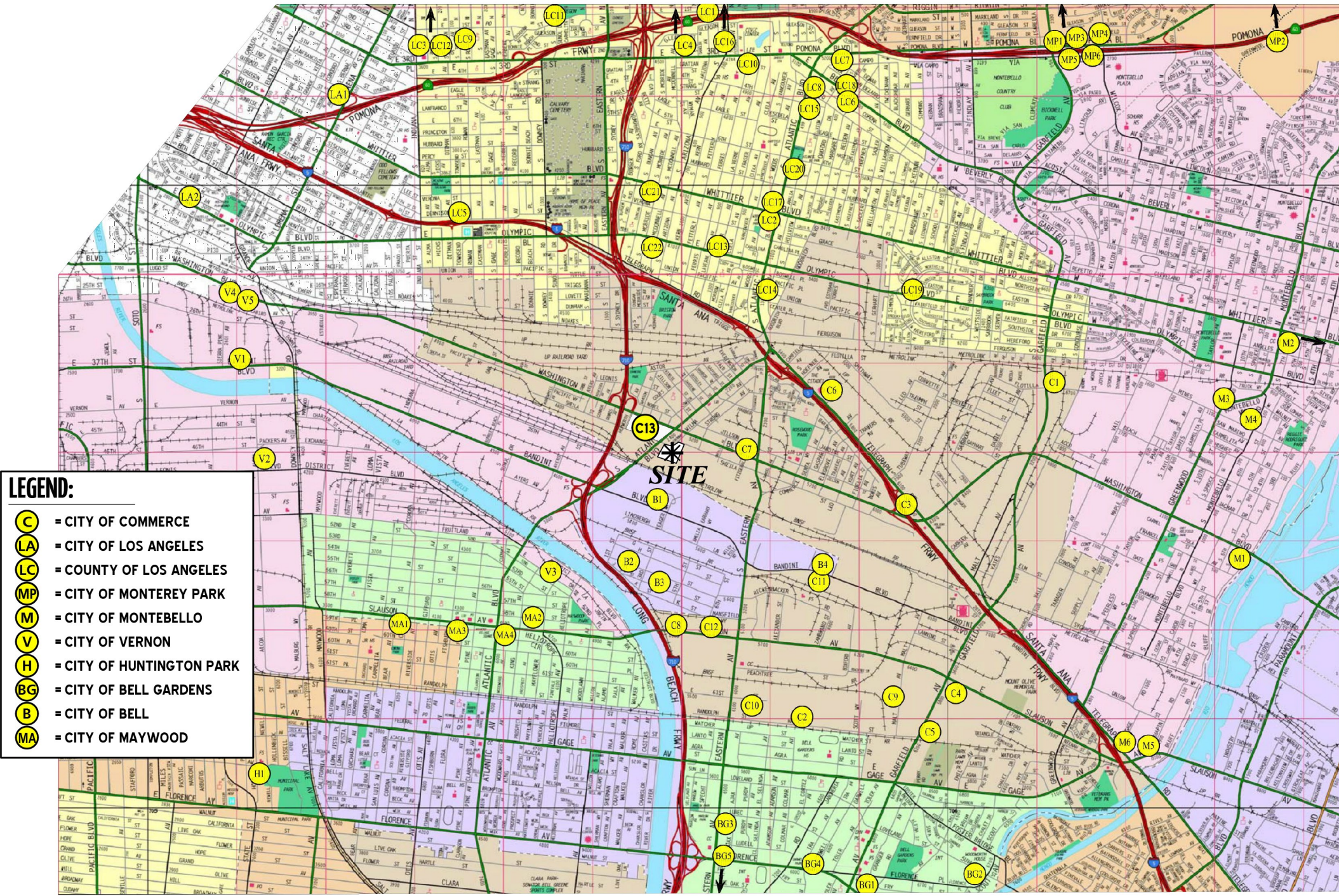
ID	Project/Location	Land Use	Quantity	Units
City of Commerce				
C1	6605 Flotilla Street	Warehouse	42.131	TSF
C2	5959 Randolph Street	Warehouse	402.507	TSF
C3	6150 and 6170 E. Telegraph Road	Retail	12.754	TSF
C4	6810 E. Slauson Avenue	Convenience Market	3.037	TSF
C5	Garfield Corporate Center (6100 Garfield Avenue)	Warehouse/Distribution Center	630.000	TSF
C6	Citadel Outlets Expansion (100 Citadel Drive)	Retail	92.299	TSF
C7	Rolling Pin (5505 E. Washington Boulevard)	Fast Food Restaurant w/ Drive-Through	4.600	TSF
		Retail	2.400	TSF
C8	5401 E. Slauson Avenue	Warehouse	75.500	TSF
C9	6009-6041 S. Malt Avenue	Warehouse	140.509	TSF
C10	5832 E. 61st Street	Warehouse	35.556	TSF
C11	6040 Bandini Avenue	Warehouse	114.000	TSF
C12	5555 E. Slauson Avenue	Warehouse	80.000	TSF
C13	Commerce Retail Center	Free-Standing Discount Superstore	127.500	TSF
		Drive-In Bank	4.500	TSF
		Fast Food Restaurant w/ Drive-Through	3.400	TSF
		Retail	6.900	TSF
		High Turnover (Sit-Down) Restaurant	3.000	TSF
		Fast Food Restaurant w/o Drive-Through	3.000	TSF
City of Los Angeles				
LA1	Lorena Apartments (625 S. Lorena Street)	Apartments	112	DU
LA2	Boyle Heights Mixed Use (2901 E. Olympic Boulevard)	Apartments	959	DU
		Retail	161.100	TSF
		General Office	75.000	TSF
		Medical Office	25.000	TSF
Los Angeles County				
LC1	4735 E. 1 st Street	Church	9.652	TSF
LC2	909 S. Atlantic Boulevard	Pharmacy w/o Drive-Through	12.768	TSF
LC3	1522 N. Indiana Street	Recycling Center	6.300	TSF
LC4	518 and 522 N/ Dangler Avenue	Day Care Center	1.920	TSF
LC5	3949 Dennison Street	Convenience Market	2.120	TSF
LC6	5338 E. Beverly Boulevard	Tattoo Parlor	1.950	TSF
LC7	LA Auto Sales (5270 Pomona Boulevard	Used Auto Sales	5.995	TSF
LC8	344 S. Atlantic Boulevard	Auto Body Repair Shop	4.199	TSF
LC9	3640 E. 1 st Street	Charter Middle School	450	STU
LC10	4816 E. 3 rd Street	Hospital/Health Center	24.800	TSF



LC11	151 N. Sunol Drive	Apartments	75	DU
LC12	1533 Fishburn Avenue	Material Recovery Facility & Transfer Station	26.020	TSF
LC13	4939 E. Olympic Boulevard	Used Auto Sales	2.875	TSF
LC14	1300 S. Atlantic Boulevard	Used Auto Sales	14.520	TSF
LC15	420 S. Atlantic Boulevard	Used Auto Sales	5.200	TSF
LC16	107 N. Mednik Avenue	Condominium	24	DU
LC17	723 South Atlantic Boulevard	Auto Sales	5.332	TSF
LC18	5313 E. Beverly Boulevard	Massage Parlor	1.247	TSF
LC19	5911 Olympic Boulevard	Used Auto Sales	11.770	TSF
LC20	604 S. Atlantic Boulevard	Used Auto Sales	5.875	TSF
LC21	4530 Whittier Boulevard	MDV Registration Services	17.484	TSF
LC22	4640 E. Olympic Boulevard	Used Auto Sales	17.424	TSF
City of Monterey Park				
MP1	Monterey Park (Town Center (SEC Garvey Avenue/Garfield Avenue))	High Cube Warehouse	476.000	TSF
		Warehouse	30.000	TSF
MP2	Monterey Park Market Place (2550 Greenwood Avenue)	High-Cube Warehouse	677.000	TSF
MP3	400 N. Garfield Avenue	SFDR	198	DU
MP4	521-733 N. Atlantic Boulevard	Warehouse	395.000	TSF
MP5	808 W. Garvey Avenue	High-Cube Warehouse	800.000	TSF
		High-Cube Fulfilment Center	451.640	TSF
MP6	220 N/ Atlantic Boulevard	Warehouse	257.855	TSF
City of Montebello				
M1	100 W. Washington Boulevard	Condominium	60	DU
		Retail	8.000	TSF
M2	140 E. Whittier Boulevard	Condominium	86	DU
M3	545 S. Greenwood Avenue	Condominium	57	DU
M4	501 S. Montebello Boulevard	Apartment	29	DU
M5	8105 E. Slauson Avenue	Warehouse	7.304	TSF
M6	7709 Telegraph Road	Hotel	160	RM
City of Vernon				
V1	3305 Bandini Boulevard	Industrial	200.000	TSF
V2	4700 Alcoa Avenue	Industrial	47.285	TSF
V3	4675 52 nd Street	Apartments	45	DU
V4	3222 Washington Boulevard	Industrial	66.000	TSF
V5	3232 Washington Boulevard	Industrial	45.000	TSF
City of Huntington Park				
H1	South Region Elementary School #5 (3232 Saturn Avenue)	Elementary School	950	STU
City of Bell Gardens				
BG1	Niky's Sports No. 4 Store (6365 Florence Avenue)	Sporting Goods Store	6.027	TSF
BG2	6814 Suva Street	Industrial	6.000	TSF
BG3	Walmart Neighborhood Market (6820 Eastern Avenue)	Supermarket	31.660	TSF

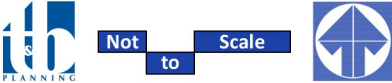


BG4	6107 Florence Avenue	Retail	9.100	TSF
BG5	Terra Bella Senior Apartments (5720 Clara Street)	Senior Adult Housing-Attached	65	DU
City of Bell				
B1	Bandini Industrial Center (5555 Bandini Boulevard)	Warehouse/Distribution Center	536.400	TSF
B2	Bell Business Center (Rickenbacker Road)	Warehouse	84.390	TSF
B3	5600 Rickenbacker Road)	High School/Adult School	2,700	STU
B4	6025 Bandini Road	Warehouse	62.000	DU
City of Maywood				
MA1	3800 E. Slauson Avenue	Motel	16	RM
MA2	South Region High School No. 8 (NWC of Slauson Avenue/Mayflower Avenue)	High School	1,215	STU
		Adult School	300	STU
MA3	Super Grocers (4308 E. Slauson Avenue)	Supermarket	30.173	TSF
MA4	4524 E. Slauson Avenue	General Office	12.539	TSF
DU = Dwelling Units; TSF = Thousand Square Feet; STU = Students; RM = Rooms				



Source(s): Urban Crossroads (10-06-2020)

Figure 4.0-1



Cumulative Development Location Map

Lead Agency: City of Commerce



4.1 AIR QUALITY

This Subsection is based in part on two technical studies that were prepared by Urban Crossroads, Inc. to evaluate the Project's potential to adversely affect local and regional air quality. The air quality impact analysis prepared for the Project is titled "5200 Sheila Street Air Quality Impact Analysis, City of Commerce" dated October 6, 2020, and appended to this EIR as Appendix B1 (Urban Crossroads, 2020a). The mobile source health risk assessment prepared for the Project is titled "5200 Sheila Street Mobile Source Health Risk Assessment, City of Commerce" dated October 6, 2020 and appended to this EIR as Appendix B2 (Urban Crossroads, 2020b).

4.1.1 EXISTING CONDITIONS

A. South Coast Air Basin

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of South Coast Air Quality Management District (South Coast AQMD). The SCAB encompasses a 6,745-square mile subregion of the South Coast AQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Los Angeles County portion of the Mojave Desert Air Basin is bounded by the San Gabriel Mountains to the south and west, the Los Angeles / Kern County border to the north, and the Los Angeles / San Bernardino County border to the east. The Riverside County portion of the Salton Sea Air Basin is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. (Urban Crossroads, 2020a, p. 8)

B. Climate and Meteorology

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (Urban Crossroads, 2020a, p. 8)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a



characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2020a, p. 8)

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. (Urban Crossroads, 2020a, pp. 8-9)

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14½ hours of possible sunshine. (Urban Crossroads, 2020a, p. 9)

The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2020a, p. 9)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO_x) and carbon monoxide (CO) from



vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2020a, p. 9)

C. Criteria Pollutants and Associated Health Effects

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified below: (Urban Crossroads, 2020a, pp. 10-16)

- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest in the winter during the morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. CO is emitted directly from internal combustion engines; therefore, motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Therefore, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. The most common symptoms associated with CO poisoning include headache, nausea, vomiting, dizziness, fatigue, and weakness. Individuals most at risk to the effects of CO include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic oxygen deficiency.
- **Sulfur Dioxide (SO₂)** is a colorless gas or liquid. SO₂ enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (SO_x). SO₂ is a respiratory irritant to people afflicted with asthma. After a few minutes' exposure to low levels of SO₂, asthma sufferers can experience breathing difficulties, including airway constriction and reduction in breathing capacity. Although healthy individuals do not exhibit similar acute breathing difficulties in response to SO₂ exposure at low levels, animal studies suggest that very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.
- **Nitrogen Oxides (NO_x)** consist of nitric oxide (NO), nitrogen dioxide (NO₂) and nitrous oxide (N₂O) and are formed when nitrogen (N₂) combines with oxygen (O₂). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO₂ is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere, and reduced visibility. Of the nitrogen oxide compounds, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic



density, commuters in heavy traffic may be exposed to higher concentrations of NO₂ than those indicated by regional monitoring stations. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO₂. Short-term exposure to NO₂ can result in resistance to air flow and airway contraction in healthy subjects. Exposure to NO₂ can result decreases in lung functions in individuals with asthma or chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema), as these individuals are more susceptible to the effects of NO_x than healthy individuals.

- **Ozone (O₃)** is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and NO_x, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, warm temperatures, and light wind conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high ozone levels.
- **Particulate Matter less than 10 microns (PM₁₀)** is an air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to enter the lungs where they may be deposited, resulting in the adverse health effects discussed below for PM_{2.5}. PM₁₀ also causes visibility reduction.
- **Particulate Matter less than 2.5 microns (PM_{2.5})** is a similar air pollutant to PM₁₀ consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO₂ release from power plants and industrial facilities and nitrates that are formed from NO_x release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles is highly dependent on location, time of year, and weather conditions. Elevated ambient concentrations of fine particulate matter (PM₁₀ and PM_{2.5}) have been linked to an increase in respiratory infections, number, and severity of asthma attacks, and increased hospital admissions. Some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. Daily fluctuations in PM_{2.5} concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies



show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children, appear to be more susceptible to the effects of high levels of PM₁₀ and PM_{2.5}.

- **Volatile Organic Compounds (VOCs) and Reactive Organic Gasses (ROGs)** are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. Both VOCs and ROGs are precursors to ozone and contribute to the formation of smog through atmospheric photochemical reactions. VOCs and ROGs have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, including such common VOCs as gasoline, alcohol, and the solvents used in paints. Odors generated by VOCs can irritate the eye, nose, and throat, which can reduce respiratory volume. In addition, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system.
- **Lead (Pb)** is a heavy metal that is highly persistent in the environment. Historically, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the South Coast AQMD's regular air quality monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure.
- **Odor** is the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, nature, and vehicles. Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress.

D. Existing Air Quality

Air quality is measured at established South Coast AQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health



and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 4.1-1, *Ambient Air Quality Standards*.

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards. At the time of this AQIA, the most recent state and federal standards were updated by the California Air Resources Board (CARB) on May 4, 2016 and are presented in Table 4.1-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for O₃, CO, SO₂ (1 and 24 hour), NO₂, PM₁₀, and PM_{2.5} are not to be exceeded. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the South Coast AQMD meets the standards set by the EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) is drafted by CARB. The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area. (Urban Crossroads, 2020a, p. 17)

Table 4.1-1 Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone (O₃)	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	---	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM₁₀)	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		---		
Fine Particulate Matter (PM_{2.5})	24 Hour	---	---	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³	15 µg/m ³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/ m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/ m ³)	---	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/ m ³)		9 ppm (10 mg/ m ³)	---	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/ m ³)		---	---	
	1 Hour	0.18 ppm (339 µg/ m ³)		110 ppb (118 µg/ m ³)	---	



Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Nitrogen Dioxide (NO₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/ m ³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m ³)	Same as Primary Standard	Gas Phase Chemiluminescence
Sulfur Dioxide (SO₂)	1 Hour	0.25 ppm (665 µg/ m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/ m ³)	---	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	---		---	0.5 ppm (1300 µg/ m ³)	
	24 Hour	0.04 ppm (105 µg/ m ³)		0.14 ppm (for certain areas)	---	
	Annual Arithmetic Mean	---		0.030 ppm (for certain areas)	---	
Lead	30 Day Average	1.5 µg/ m ³	Atomic Absorption	---		High Volume Sampler and Atomic Absorption
	Calendar Quarter	---		1.5 µg/ m ³ (for certain areas)	Same as Primary Standard	
	Rolling 3-Month Average	---		0.15 1.5 µg/ m ³		
Visibility Reducing Particles	8 Hour	See Footnote 14	Beta Attenuation and Transmittance through filter tape			
Sulfates	24 Hour	25 µg/ m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/ m ³)	Ultraviolet Fluorescence			
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/ m ³)	Gas Chromatography			

See footnotes in Appendix B1.

Source: (Urban Crossroads, 2020a, Table 2-2)



1. Attainment Status of Criteria Pollutants in the SCAB

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O₃, particulate matter (PM₁₀ and PM_{2.5}), NO₂, and SO₂ which are known as criteria pollutants. The South Coast AQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district. On February 21, 2019, CARB posted the 2018 amendments to the state and national area designations. The attainment status for criteria pollutants within the SCAB is summarized in Table 4.1-2, *Attainment Status of Criteria Pollutants in the South Coast Air Basin* (Urban Crossroads, 2020a, p. 20)

Table 4.1-2 Attainment Status of Criteria Pollutants in the South Coast Air Basin

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/ Attainment
NO ₂	Attainment	Unclassifiable/ Attainment
SO ₂	Unclassifiable/ Attainment	Unclassifiable/ Attainment
Pb ¹	Attainment	Unclassifiable/ Attainment

“—” The national 1-hour O₃ standard was revoked effective June 15, 2005.

1. The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

Source: (Urban Crossroads, 2020a, Table 2-3)

2. Air Quality History and Trends

□ Criteria Pollutants

South Coast AQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SCAB air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the SCAB. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. (Urban Crossroads, 2020a, p. 25)

The South Coast AQMD is the lead agency charged with regulating air quality emission reductions for the entire SCAB. South Coast AQMD created AQMPs which represent a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SCAB. The 2012 AQMP states, “the remarkable historical improvement in air quality since the 1970’s is the direct result of Southern California’s comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs.” (Urban Crossroads, 2020a, p. 25)



The graphs on the following pages show air quality trend information as reported by the South Coast AQMD. The overall trend represents improvement in air quality.

Emissions of O₃, NO_x, VOC, and CO have been decreasing in the SCAB since 1975 and are projected to continue to decrease through 2020. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although VMT in the SCAB continue to increase, NO_x and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_x emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. O₃ contour maps show that the number of days exceeding the 8-hour NAAQS has decreased between 1997 and 2007. In the 2007 period, there was an overall decrease in exceedance days compared with the 1997 period. However, as shown below, O₃ levels have increased in the past two years due to higher temperatures and stagnant weather conditions. Notwithstanding, O₃ levels in the SCAB have decreased substantially over the last 30 years with the current maximum measured concentrations being approximately one-third of concentrations within the late 70's. (Urban Crossroads, 2020a, p. 26)

As with other pollutants, the most recent PM₁₀ statistics show an overall improvement as illustrated below. During the period for which data are available, the 24-hour national annual average concentration for PM₁₀ decreased by approximately 48%, from 103.7 microgram per cubic meter (µg/m³) in 1988 to 53.5 µg/m³ in 2018. Although the values are below the federal standard, it should be noted that there are days within the year where the concentrations will exceed the threshold. The 24-hour state annual average for emissions for PM₁₀, have decreased by approximately 53% since 1988. Although data in the late 1990's show some variability, this is probably due to the advances in meteorological science rather than a change in emissions. Similar to the ambient concentrations, the calculated number of days above the 24-hour PM₁₀ standards has also shown an overall drop. (Urban Crossroads, 2020a, p. 27)

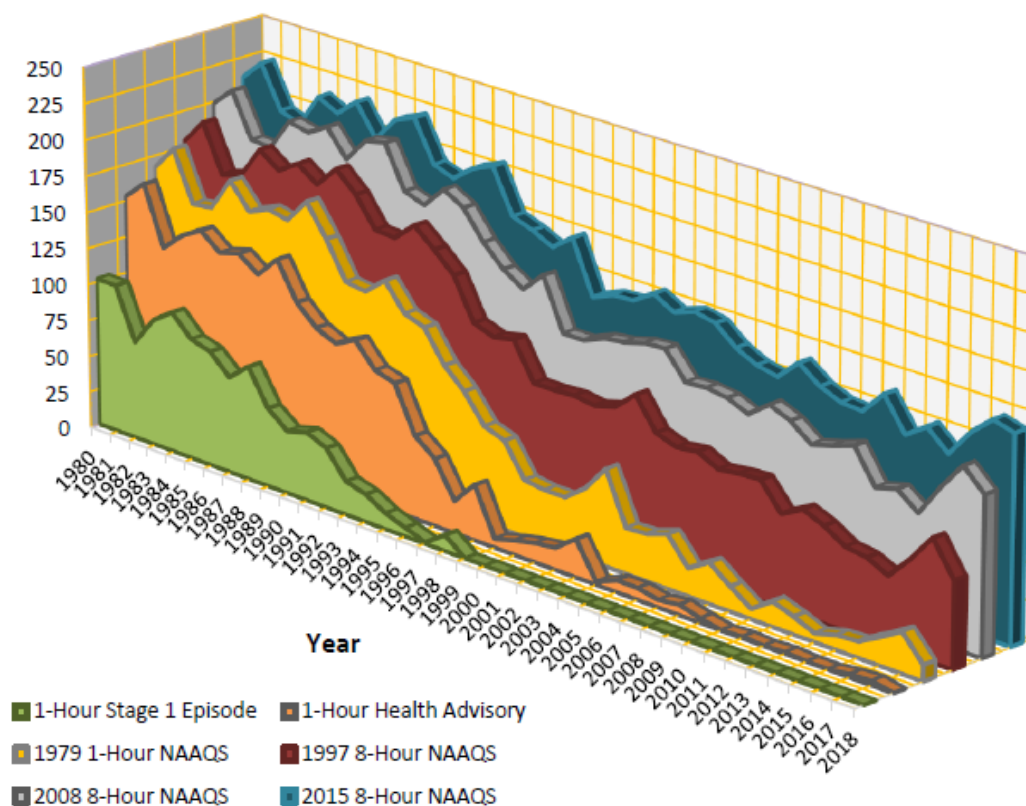
The most recent CO concentrations in the SCAB are shown in Table 2-10. CO concentrations in the SCAB have decreased markedly — a total decrease of more about 80% in the peak 8-hour concentration since 1986. It should be noted 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB. The number of exceedance days has also declined. The entire SCAB is now designated as attainment for both the state and national CO standards. Ongoing reductions from motor vehicle control programs should continue the downward trend in ambient CO concentrations. (Urban Crossroads, 2020a, p. 30)

The most recent NO₂ data for the SCAB is shown in Tables 2-11 and 2-12. Over the last 50 years, NO₂ values have decreased significantly; the peak 1-hour national and state averages for 2018 is approximately 82% lower than what it was during 1963. The SCAB attained the State 1-hour NO₂ standard in 1994, bringing the entire state into attainment. A new state annual average standard of 0.030 ppm was adopted by the ARB in February 2007. The new standard is just barely exceeded in the South Coast AQMD. NO₂ is formed from NO_x emissions, which also contribute to O₃. As a result, the majority of the future emission control measures will be implemented as part of the overall O₃ control strategy. Many of these control measures will target mobile sources, which account for more than



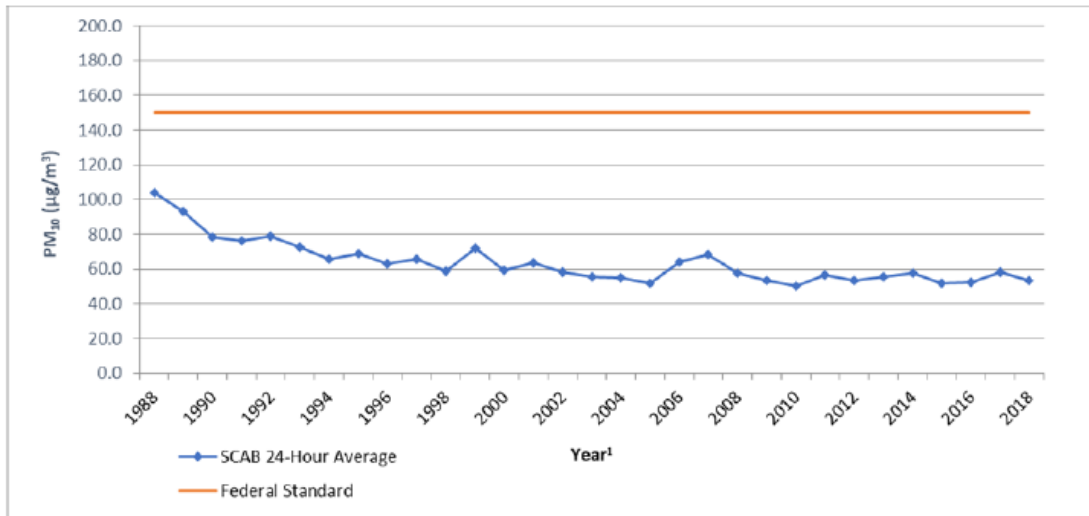
three-quarters of California's NO_x emissions. These measures are expected to bring the South Coast AQMD into attainment of the state annual average standard. (Urban Crossroads, 2020a, p. 30)

South Coast Air Basin Ozone Trend

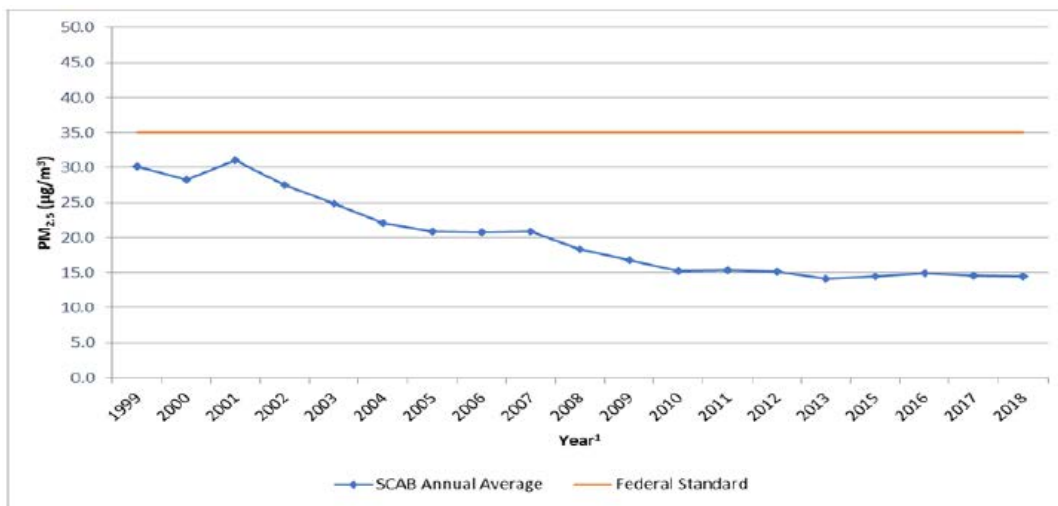




South Coast Air Basin PM₁₀ Trend (based on Federal Standard)

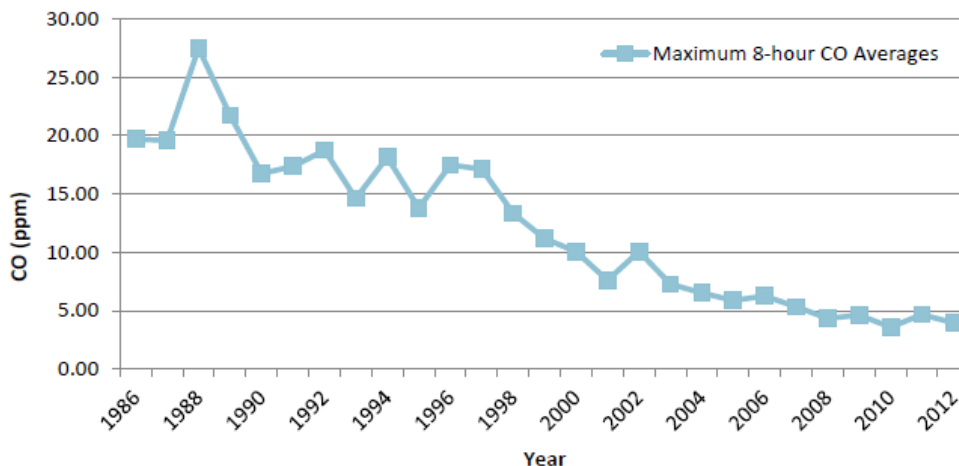


South Coast Air Basin PM_{2.5} Trend (based on Federal Standard)

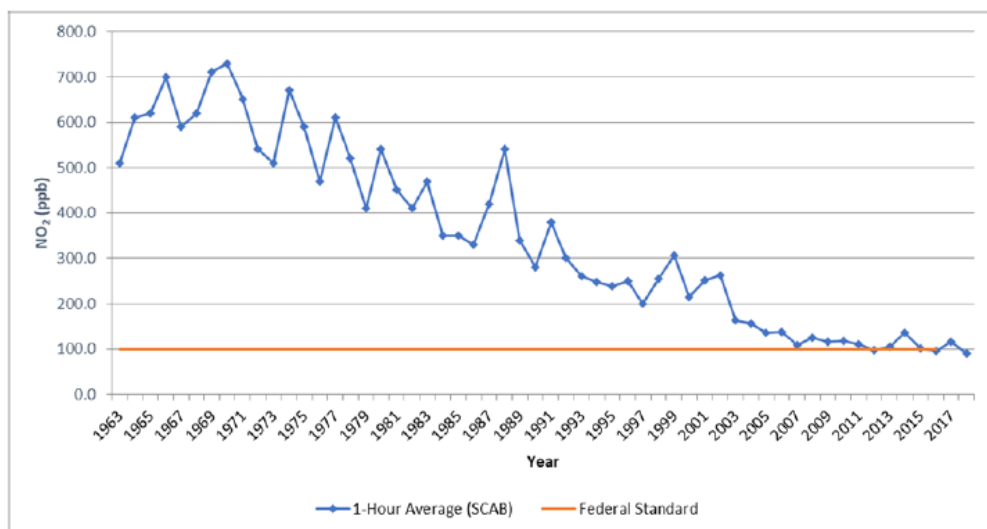




South Coast Air Basin Carbon Monoxide Trend



South Coast Air Basin NO₂ Trend (based on Federal Standard)



☐ Toxic Air Contaminants

Toxic air contaminants (TACs) are a classification of air pollutants that have been attributed to carcinogenic and non-carcinogenic health risks. In 1984, as a result of public concern for exposure to airborne carcinogens, the CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. According to the Ambient and Emission Trends of Toxic Air Contaminants in California journal article (29) which was prepared for CARB, results show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly (between 1990 and 2012). The seven TACs studied include those that are derived from mobile sources: diesel particulate matter (DPM), benzene



(C₆H₆), and 1,3-butadiene (C₄H₆); those that are derived from stationary sources: perchloroethylene (C₂Cl₄) and hexavalent chromium (Cr(VI)); and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH₂O) and acetaldehyde (C₂H₄O)₂. TACs data was gathered at monitoring sites from both the Bay Area and SCAB, as shown on Exhibit 2-A; Several of the sites in the SCAB include Reseda, Compton, Rubidoux, Burbank, and Fontana. The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk. (Urban Crossroads, 2020a, p. 32)

CARB introduced two programs that aimed at reducing mobile emissions for light and medium duty vehicles through vehicle emissions controls and cleaner fuel. In California, light-duty vehicles sold after 1996 are equipped with California's second-generation On-Board Diagnostic (OBD-II) system. The OBD-II system monitors virtually every component that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD-II system illuminates a warning lamp on the vehicle instrument panel to alert the driver. This warning lamp typically contains the phrase "Check Engine" or "Service Engine Soon". The system will also store important information about the detected malfunction so that a repair technician can accurately find and fix the problem. CARB has recently developed similar OBD requirements for heavy-duty vehicles over 14,000 pounds (lbs). CARB's phase II Reformulated Gasoline Regulation (RFG-2), adopted in 1996, also led to a reduction of mobile source emissions. Through such regulations, benzene levels declined 88% from 1990-2012. 1,3-Butadiene concentrations also declined 85% from 1990-2012 as a result of the use of reformulated gasoline and motor vehicle regulations. (Urban Crossroads, 2020a, p. 33)

In 2000, CARB's Diesel Risk Reduction Plan (DRRP) recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (<15 ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% since 2000, even though the state's population increased 31% and the amount of diesel vehicles miles traveled increased 81%, as shown on Exhibit 2-B. With the implementation of these diesel-related control regulations, CARB expects a DPM decline of 71% for 2000-2020. (Urban Crossroads, 2020a, p. 33)

☐ Diesel Regulations

The CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, the CARB Drayage Truck Regulation, the CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of "clean trucks" into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements. (Urban Crossroads, 2020a, p. 34)

Moreover, the average statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to the aforementioned regulatory



requirements. Diesel emissions identified in this analysis would therefore overstate future DPM emissions since not all the regulatory requirements are reflected in the modeling. (Urban Crossroads, 2020a, p. 34)

☐ Cancer Risk Trends

Based on information available from CARB, overall cancer risk throughout the SCAB has had a declining trend since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a TAC. The South Coast AQMD initiated a comprehensive urban toxic air pollution study called the Multiple Air Toxics Exposure Study (MATES). DPM accounts for more than 70% of the cancer risk. (Urban Crossroads, 2020a, p. 34)

In 2008 the South Coast AQMD prepared an update to the MATES-II study, referred to as MATES-III. MATES-III estimates the average excess cancer risk level from exposure to TACs is an approximately 17% decrease in comparison to the MATES-II study. (Urban Crossroads, 2020a, p. 34)

In 2015, the South Coast AQMD published an in-depth analysis of the TACs and the resulting health risks for all of Southern California. The Multiple Air Toxics Exposure Study in the SCAB, MATES IV,” which shows that cancer risk has decreased less than 50% since MATES III (2005). (Urban Crossroads, 2020a, p. 34)

MATES-IV study represents the baseline health risk for a cumulative analysis. MATES-IV calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-IV has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. (Urban Crossroads, 2020a, p. 34)

MATES-IV modeling predicted an excess cancer risk of 1,387.07 in one million for the geographic grid containing the Project site. DPM is included in this cancer risk along with all other TAC sources. DPM accounts for 68% of the total risk shown in MATES-IV. Cumulative Project generated TACs are limited to DPM. (Urban Crossroads, 2020a, pp. 34-35)

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, South Coast AQMD began conducting the MATES V Program. MATES V field measurements will be conducted over a one-year period at ten fixed sites (the same sites selected for MATES III and IV) to assess trends in air toxics levels. MATES V will also include measurements of ultrafine particles (UFP) and black carbon (BC) concentrations, which can be compared to the UFP levels measured in MATES IV. The final report for the MATES V study was expected to be available in Fall 2019, however it is not yet available and no definitive date for its release has been provided by South Coast AQMD. (Urban Crossroads, 2020a, p. 35)



3. Local Air Quality

Relative to the Project site, the nearest long-term monitoring site for CO, O₃, NO₂, PM_{2.5}, and PM₁₀ is the South Coast AQMD East San Gabriel Valley monitoring station, located approximately 5.52 miles northeast of the Project site in Source Receptor Area 11.

Table 4.1-3, *Project Area Air Quality Monitoring Summary 2016-2018*, provides a summary of ambient air quality conditions in the general vicinity of the Project site from 2016 to 2018, which is the most recent three-year period for which air quality information is available.

Table 4.1-3 Project Area Air Quality Monitoring Summary 2016-2018

Pollutant	Standard	Year		
		2016	2017	2018
O ₃				
Maximum Federal 1-hour Concentration (ppm)	--	0.111	0.118	0.115
Maximum Federal 8-hour Concentration (ppm)	--	0.081	0.086	0.082
Number of Days Exceeding State 1-hour Standard	> 0.09 ppm	9	7	3
Number of Days Exceeding Federal/State 8-Hour Standard	> 0.070 ppm	6	9	5
CO				
Maximum Federal 1-hour Concentration	> 35 ppm	2.8	2.5	2.0
Maximum Federal 8-hour Concentration	> 20 ppm	1.7	2.2	1.8
NO ₂				
Maximum Federal 24-hour Concentration	>0.100	0.063	0.075	0.077
Annual Federal Standard Design Value	--	0.020	0.020	0.018
PM ₁₀				
Maximum Federal 24-Hour Concentration (µg/m ³)	>150 (µg/m ³)	67	96	81
Annual Federal Arithmetic Mean (µg/m ³)	--	32.4	34.4	34.1
Number of Days Exceeding Federal 24-Hour Standard	> 150 (µg/m ³)	0	0	0
Number of Days Exceeding State 24-hour	> 50 (µg/m ³)	18	41	31
PM _{2.5}				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 35 (µg/m ³)	46.59	49.50	35.40
Annual Federal Arithmetic Mean (µg/m ³)	> 12 (µg/m ³)	11.75	12.23	12.31
Number of Days Exceeding Federal 24-Hour Standard	> 35 (µg/m ³)	2	1	0

ppm = parts per million

(µg/m³) = micro gram per cubic meter

Source: (Urban Crossroads, 2020a. Table 2-4)

The Project site is currently developed with a 112,953-sf office building. The estimated operation-source emissions from the existing development are summarized on Table 4.1-4, *Emissions from Existing Development*.



Table 4.1-4 Emissions from Existing Development

Existing Development Operation Activities	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Scenario						
Total Maximum Daily Emissions	3.76	4.59	16.92	0.07	5.82	1.63
Winter Scenario						
Total Maximum Daily Emissions	3.78	4.80	13.30	0.07	5.82	1.63

4.1.2 REGULATORY FRAMEWORK

The following is a brief description of the federal, State, and local environmental laws and related regulations governing air quality emissions.

1. Federal Regulations

☐ Federal Clean Air Act

The Federal Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement SIPs for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. (Urban Crossroads, 2020a, pp. 21-22)

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O₃, NO₂, SO₂, PM₁₀, CO, PM_{2.5}, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O₃ and to adopt a NAAQS for PM_{2.5}. Table 2-3 (previously presented) provides the NAAQS within the SCAB. (Urban Crossroads, 2020a, p. 22)

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_x. NO_x is a collective term that includes all forms of NO_x which are emitted as byproducts of the combustion process. (Urban Crossroads, 2020a, p. 22)



2. State Regulations

☐ **California Air Resources Board (CARB)**

The CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO₄, visibility, hydrogen sulfide (H₂S), and vinyl chloride (C₂H₃Cl). However, at this time, H₂S and C₂H₃Cl are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS. (Urban Crossroads, 2020a, p. 22)

Local air quality management districts, such as the South Coast AQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS. (Urban Crossroads, 2020a, p. 22)

Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMP) that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include: (Urban Crossroads, 2020a, pp. 22-23)

- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g. motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROG_s, NO_x, CO and PM₁₀. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances.

☐ **Title 24 Energy Efficiency Standards and California Green Building Standards**

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative



mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that will be effective January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance provided, they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official. (Urban Crossroads, 2020a, p. 23)

Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020. (Urban Crossroads, 2020a, p. 23)

The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SCAB and across the State of California. For example, the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements. (Urban Crossroads, 2020a, p. 23)

Because the Project will be constructed after January 1, 2019, the 2019 CALGreen standards are applicable to the Project. (Urban Crossroads, 2020a, p. 24)

4.1.3 METHODOLOGY

A. Project-Related Construction Emissions

On October 17, 2017, the South Coast AQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod) version 2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO,



PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. (Urban Crossroads, 2020a, p. 38)

☐ Construction Activities

Construction activities associated with the Project will result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Construction related emissions are expected from the following construction activities: (Urban Crossroads, 2020a, p. 37)

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

The Project will require the demolition of the existing 112,953-sf office building, 3,160 tons of asphalt, and 8,500 tons of concrete. For purposes of analysis a total of 16,855.84 tons of debris will be analyzed¹. It should be noted that the 3,160 tons of asphalt and 8,500 tons of concrete will be pulverized and left on-site for reuse. The remaining 5,195.84 tons of debris will be hauled off-site to the California Waste Services in Gardena, 15.5 miles from the Project site. Assuming each truck will have a haul capacity of 20 tons, it is assumed that hauling of the 5,198.84 tons of debris will generate 520 trips. (Urban Crossroads, 2020a, p. 38)

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions”. Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Based on information provided by the Project Applicant, the Project is anticipated to require 118 cubic yards of import. The CalEEMod default hauling trip length of 20 miles was used. (Urban Crossroads, 2020a, p. 38)

Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on information from CalEEMod defaults. (Urban Crossroads, 2020a, p. 38)

¹ In order to model the total demolition quantities, the 112,953-sf office building was converted to tons by using the same methodology and conversion factors presented in on Appendix A of Appendix B1, appended to this EIR. As such, it is anticipated that the 112,953-sf building will result in 5,195.84 tons of debris.



☐ Construction Duration

For the purposes of evaluating the Project's construction-related air quality impacts, construction is expected to commence in February 2021 and will last through July 2022. The construction schedule utilized in the analysis, shown in Table 4.1-5, *Construction Duration*, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. The duration of construction activity was based on information provided by the Project Applicant, CalEEMod defaults, and the 2022 opening year. (Urban Crossroads, 2020a, p. 39)

Table 4.1-5 Construction Duration

Phase Name	Start Date	End Date	Days
Demolition	02/01/2021	06/04/2021	90
Site Preparation	06/05/2021	06/18/2021	10
Grading	06/19/2021	07/16/2021	20
Building Construction	07/17/2021	06/03/2022	230
Paving	06/04/2022	07/01/2022	20
Architectural Coating	07/02/2022	07/29/2022	20

Source: (Urban Crossroads, 2020a, Table 3-2)

☐ Construction Equipment

The construction equipment fleet was based on CalEEMod defaults and confirmed with the Project Applicant as being reasonable. It should be noted that the County of Los Angeles has established limits to the hours of operation for construction activity. According Title 12, Chapter 12.12 of Los Angeles County Code, construction activity cannot take place between the hours of 8:00 pm and 6:30 am. As such, construction activities are permitted to occur up to eleven (11) hours per day. However, it should be noted that the identified construction equipment would not be used during every hour of the day. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-3 will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code. It should be noted that most pieces of equipment would likely operate for fewer hours per day. A summary of construction equipment assumptions by phase is provided at Table 4.1-6, *Construction Equipment Assumptions*. (Urban Crossroads, 2020a, p. 40)



Table 4.1-6 Construction Equipment Assumptions

Phase Name	Equipment Name	Quantity	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	3	8
	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozer	1	8
Building Construction	Crawler Tractors	1	8
	Cranes	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2020a, Table 3-3)

B. Construction Localized Pollutant Emissions

Localized emissions associated with Project-related construction activities were calculated and evaluated in accordance with South Coast AQMD's *Final Localized Significance Threshold Methodology* ("Methodology"). The South Coast AQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the NAAQS and CAAQS. Collectively, these are referred to as Localized Significance Thresholds (LSTs). (Urban Crossroads, 2020a, p. 46)

For this Project, the appropriate SRA for the LST analysis is Southeast Los Angeles County (SRA 5). LSTs apply to CO, NO_x, PM₁₀, and PM_{2.5}. The South Coast AQMD produced look-up tables for projects less than or equal to 5 acres in size. In order to determine the appropriate methodology for determining localized impacts that could occur as a result of Project-related construction, the following process is undertaken: (Urban Crossroads, 2020a, p. 47)

- CalEEMod is utilized to determine the maximum daily on-site emissions that will occur during construction activity.
- The South Coast AQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds and CalEEMod User's Guide Appendix A: Calculation Details for CalEEMod is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.



- If the total acreage disturbed is less than or equal to five acres per day, then the South Coast AQMD's screening look-up tables are utilized to determine if a Project has the potential to result in a significant impact. The look-up tables establish a maximum daily emissions threshold in lbs/day that can be compared to CalEEMod outputs.
- If the total acreage disturbed is greater than five acres per day, then LST impacts are appropriately evaluated through dispersion modeling.
- The LST methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds.

South Coast AQMD's Methodology clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. (Urban Crossroads, 2020a, p. 49)

The South Coast AQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual and cumulatively significant impact. The nearest land use where an individual could remain for 24 hours to the Project site (in this case the nearest residential land use) has been used to determine localized construction air quality impacts for emissions of PM₁₀ and PM_{2.5} (since PM₁₀ and PM_{2.5} thresholds are based on a 24 hour averaging time). As indicated on Figure 4.1-1, *Modeled Receptors*, the nearest receptor used for evaluation of localized impacts of PM₁₀ and PM_{2.5} is represented by location R3 which is an existing residential located northeast of the Projects site at approximately 540 feet/165 meters. As such, the 165-meter distance will be used for evaluation of localized PM₁₀ and PM_{2.5} emission impacts.

The nearest industrial/commercial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_x and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours. Thus, the nearest receptor used for evaluation of localized impacts of NO_x and CO is represented by location R2, also indicated on Figure 4.1-1, the Ross Health Care Clinic located 74 feet (23 meters) from the Project site. The 32-meter distance will be used for evaluation of localized NO_x and CO emission impacts. It should be noted that the LST Methodology explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." As such a 25-meter receptor distance will be used for evaluation of localized NO₂, and CO. (Urban Crossroads, 2020a, p. 49)

C. Project Operational Emissions

Operational activities associated with the proposed Project will result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Operational emissions would be expected from Area Source Emissions,



Energy Source Emissions, Mobile Source Emissions, and On-Site Equipment. For additional information regarding the calculation of Project operational emissions, please refer to Section 3.5 of the Project's Air Quality Impact Analysis (Appendix B1). (Urban Crossroads, 2020a, p. 42)

1. Area Source Emissions

Area source emissions associated with the Project would occur as a result of architectural coatings, consumer products, and landscape maintenance equipment, as follows:

☐ Architectural Coatings

Over a period of time the building that is part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using CalEEMod. (Urban Crossroads, 2020a, p. 42)

☐ Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form O₃ and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod. (Urban Crossroads, 2020a, p. 42)

☐ Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2020a, p. 42)



Source(s): Urban Crossroads (04-20-2020)

Figure 4.1-1



Not to Scale



Modeled Receptors



2. *Energy Source Emissions*

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using CalEEMod. (Urban Crossroads, 2020a, p. 42)

California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The CEC anticipates that nonresidential buildings (such as the proposed Project) will use approximately 30% less energy due to lighting upgrade requirements. The CalEEMod defaults for Title 24 – Electricity, Title 24 – Natural Gas, and Lighting Energy were reduced by 30% in order to reflect consistency with the 2019 Title 24 standards. (Urban Crossroads, 2020a, p. 43)

3. *Mobile Source Emissions*

☐ Project Trip Generation Characteristics

Project operational vehicular impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations. Project-related operational air quality impacts derive predominantly from the introduction of additional mobile sources (vehicles). Information related to the Project's daily vehicle trip generation and trip characteristics was obtained from the Project's Traffic Impact Analysis (Appendix II to this EIR). Two separate model runs were utilized for cars and trucks in order to more accurately model emissions resulting from passenger car and truck operations. (Urban Crossroads, 2020a, p. 43)

The first run analyzed passenger car emissions, incorporated the CalEEMod default trip length of 16.6 miles for passenger cars and an assumption of 100% primary trips. It is important to note that although the Traffic Assessment does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT15 & LDT26), and Medium-Duty-Vehicles (MDV) vehicle types. (Urban Crossroads, 2020a, p. 43)



The second run analyzed truck emissions, incorporated the South Coast AQMD recommended truck trip length of 40 miles² and an assumption of 100% primary trips. In order to be consistent with the Traffic Assessment, trucks are broken down by truck type. The trucks are comprised of 2-axle/Light-Heavy-Duty Trucks (LDT1 and LDT2), 3-axle/Medium-Heavy-Duty Trucks (MHDT), and 4+-axle/Heavy-Heavy-Duty Trucks (HHDT). (Urban Crossroads, 2020a, p. 44)

4. *On-Site Equipment Emissions*

It is common for industrial warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo handling equipment is the yard truck which is designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors, hustlers, yard hostlers, and yard tractors. The cargo handling equipment is assumed to have a horsepower (hp) range of approximately 175 hp to 200 hp. Based on the latest available information from South Coast AQMD; for example, high-cube warehouse projects typically have 3.6 yard trucks per million sf of building space. For this particular Project, based on the maximum square footage of each building space, on-site modeled operational equipment includes up to one (1) 200 hp, compressed natural gas or gasoline-powered yard tractors operating at 4 hours a day for 365 days of the year. (Urban Crossroads, 2020a, p. 44)

D. Operational Localized Emissions

The LST methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the project-site boundary. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required. (Urban Crossroads, 2020a, pp. 52-53)

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment). However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for

² The average trip length for heavy trucks were based on the SCAQMD documents for the implementation of the Facility Based Mobile Sources Measures adopted in the 2016 AQMP. SCAQMD's "Preliminary Warehouse Emissions Calculations" cites 39.9-mile trip length for heavy-heavy trucks. As a conservative measure, a trip length of 40 miles has been utilized for all trucks for the purpose of this analysis.

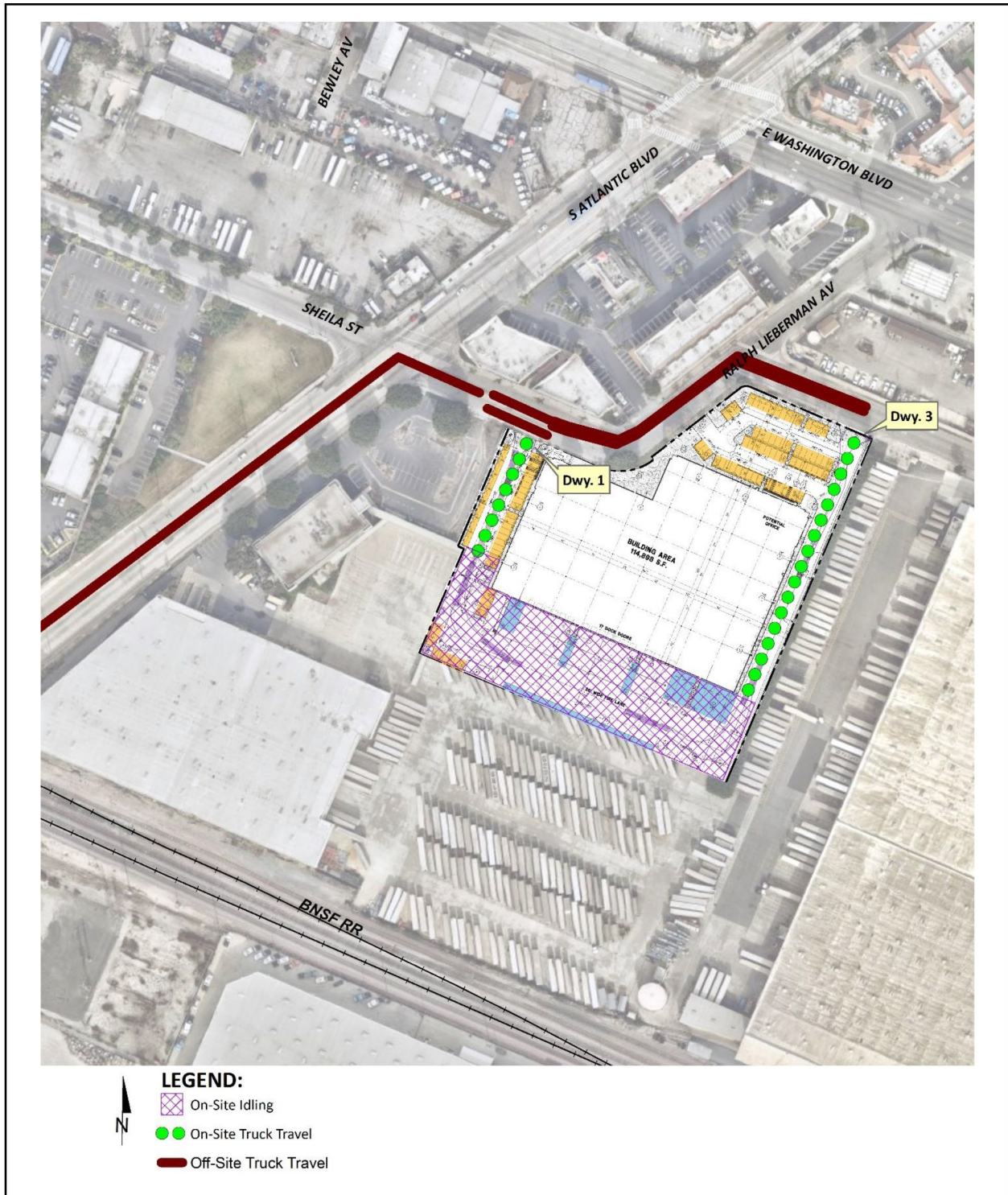


analytic purposes, emission calculations represent all on-site Project-related stationary (area) sources and five percent (5%) of the Project-related mobile sources. Considering that the trip length used in CalEEMod for the Project is approximately 16.60 miles for passenger cars and 40.00 miles for all trucks, 5% of this total would represent an on-site travel distance of approximately 0.83 miles (4,382.4 feet) for passenger cars and 2.00 miles (10,560 feet) for trucks. (Urban Crossroads, 2020a, p. 53)

E. Heath Risk Assessment Methodology

TAC emissions were calculated using the following models: CARB's California Emissions Factor Model, Version 2017 (EMFAC2017) for vehicle DPM PM₁₀ emissions, the United States Environmental Protection Agency's (EPA) AERMOD air dispersion model to determine DPM concentrations by estimating source specific inputs, South Coast AQMD's thresholds for emissions of TACs which are considered significant risk, and OHHEA's Reference Exposure Level (REL) for an evaluation of the potential noncarcinogenic effects of chronic exposures. Refer to Section 2 of the Project's *Health Risk Assessment* (Appendix B2) for a detailed description of HRA methodologies and for the model inputs and equations used in the estimation of the Project-related TAC emissions.

The modeled emission sources are illustrated on Figure 4.1-2, *Modeled Emissions Sources*. The modeled truck travel routes included in the HRA are based on the truck trip distributions (inbound and outbound) available from the Project's Traffic Assessment appended to this EIR at Appendix II. The modeled truck route is consistent with the trip distribution patterns identified in Appendix 1, is supported by substantial evidence, and was modeled to determine the potential impacts to sensitive receptors along the primary truck routes. The modeling domain is limited to the Project's primary truck route and includes off-site sources in the study area for more than 1 mile. This modeling domain is more inclusive and conservative than using only a ¼ mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential risks occur within a ¼ mile of the primary source of emissions (in the case of the Project, the primary source of emissions is the on-site idling and travel). (Urban Crossroads, 2020b, p. 10)



Source(s): Urban Corssroads (04-20-2020)

Figure 4.1-2



Not to Scale



Modeled Emission Sources



4.1.4 BASIS FOR DETERMINING SIGNIFICANCE

Section III of Appendix G to the CEQA Guidelines addresses typical adverse effects to Air Quality, and includes the following threshold questions to evaluate the Project's impacts on Air Quality.

- a. Would the Project conflict with or obstruct implementation of the applicable air quality plan?*
- 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?*
- c. Would the Project expose receptors to substantial pollutant concentrations?*
- d. Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?*

The South Coast AQMD has also developed regional significance thresholds for other regulated pollutants, as summarized in Table 4.1-7, *Maximum Daily Regional Emissions Thresholds*. The South Coast AQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. As summarized in Table 4.1-8, *Maximum Daily Localized Construction Emissions Thresholds*, LST Methodology provides look-up tables for sites with a disturbance area of 5 acres or less. LSTs for a 5-acre site during construction are used as a screening tool to determine if further detailed analysis is required.

Table 4.1-7 Maximum Daily Regional Emissions Thresholds

Pollutant	Construction Regional Threshold (lbs/day)	Operational Regional Threshold (lbs/day)
NO _x	100	55
VOC	75	55
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150
CO	550	550
Pb	3	3

(Urban Crossroads, 2020a, Table 3-1)



Table 4.1-8 Maximum Daily Localized Construction Emissions Thresholds

Pollutant	Construction Localized Thresholds
NO _x	172 lbs/day (Demolition)
	172 lbs/day (Site Preparation)
	172 lbs/day (Grading)
CO	1,480 lbs/day (Demolition)
	1,480 lbs/day (Site Preparation)
	1,480 lbs/day (Grading)
PM ₁₀	83 lbs/day (Demolition)
	83 lbs/day (Site Preparation)
	83 lbs/day (Grading)
PM _{2.5}	25 lbs/day (Demolition)
	25 lbs/day (Site Preparation)
	25 lbs/day (Grading)

For operational activities, the threshold values presented in Table 4.1-9, *Maximum Daily Localized Operational Emissions Thresholds*, are from the look-up tables at 5 acres and a 165-meter distance for localized PM₁₀ and PM_{2.5} evaluation and a 25-meter receptor distance for localized NO_x and CO evaluation.

Table 4.1-9 Maximum Daily Localized Operational Emissions Thresholds

Pollutant	Operational Localized Thresholds
NO _x	172 lbs/day (Demolition)
	172 lbs/day (Site Preparation)
	172 lbs/day (Grading)
CO	1,480 lbs/day (Demolition)
	1,480 lbs/day (Site Preparation)
	1,480 lbs/day (Grading)
PM ₁₀	83 lbs/day (Demolition)
	83 lbs/day (Site Preparation)
	83 lbs/day (Grading)
PM _{2.5}	25 lbs/day (Demolition)
	25 lbs/day (Site Preparation)
	25 lbs/day (Grading)



4.1.5 IMPACT ANALYSIS

Threshold a: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The South Coast AQMD's 2016 AQMP is the applicable air quality plan for the Project area, which estimates long-term air quality conditions for the SCAB. The air quality conditions presented in the 2016 AQMP are based in part on the growth forecasts identified by Southern California Association of Governments (SCAG) in its 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is a regional transportation and housing plan that transcends jurisdictional boundaries. The RTP/SCS anticipates that development in the various incorporated and unincorporated areas within the SCAB will occur in accordance with the adopted general plans for these areas. In addition, the air quality conditions presented in the 2016 AQMP are based on the assumption that future development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. Accordingly, if a proposed project is consistent with these growth forecasts, and if available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is considered to be consistent with the 2016 AQMP.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below: (Urban Crossroads, 2020a, p. 56)

- ***Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.***

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if LSTs or regional significance thresholds were exceeded. As evaluated under Thresholds b) and c) below, the Project's regional and localized construction-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected without mitigation. (Urban Crossroads, 2020a, p. 57)

As evaluated under Thresholds b) and c) below, the Project would not exceed the applicable regional significance thresholds and LST thresholds for operational activity. Therefore, the Project would not conflict with the AQMP according to this criterion. (Urban Crossroads, 2020a, p. 57)

Therefore, the Project is determined to be consistent with the first criterion.

- ***Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of project build-out phase.***



The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Commerce General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2020a, p. 57)

Per the City's 2020 General Plan, the Project site is designated for Heavy-Industrial (M-2) uses. As previously stated, the designation is to provide land suitable for heavy industrial uses. The proposed Project is to consist of a single 114,898 square foot warehouse building, which is consistent with the City's general plan land use designation and intensity; no general plan amendment would be required. Since the Project is consistent with the City's General Plan it is consistent with the growth projections and the AQMP. Therefore, the Project is determined to be consistent with the second criterion.

The Project would not result in or cause NAAQS or CAAQS violations. The proposed Project is consistent with the land use and growth intensities reflected in the adopted General Plan. Furthermore, the Project would not exceed any applicable regional or local thresholds. As such, the Project is therefore considered to be consistent with the AQMP and impacts would be less than significant. (Urban Crossroads, 2020a, p. 58)

Threshold 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?

A. Construction Emissions Impact Analysis

Construction is expected to commence in February 2021 and will last through July 2022. The proposed Project consists of the demolition of existing structures, construction of the proposed Project building, and eventual operation of the completed proposed building.

South Coast AQMD Rules that are currently applicable during construction activity for this Project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). (Urban Crossroads, 2020a, p. 1)

The estimated maximum daily construction emissions without mitigation are summarized on Table 4.1-10, *Maximum Daily Peak Construction Emissions Summary*. Under the assumed scenarios, emissions resulting from the Project construction will not exceed criteria pollutant thresholds established by the South Coast AQMD for emissions of any criteria pollutant. (Urban Crossroads, 2020a, p. 41). Therefore, a less than significant impact would occur and no mitigation is required.



Table 4.1-10 Maximum Daily Peak Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2021	5.42	60.84	23.36	0.07	11.34	6.52
2022	28.81	33.73	22.46	0.06	2.70	1.58
Winter						
2021	5.43	60.84	23.11	0.06	11.34	6.52
2022	28.80	33.75	22.23	0.06	2.70	1.58
Maximum Daily Emissions	28.82	60.84	23.36	0.07	11.34	6.52
South Coast AQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: (Urban Crossroads, 2020a, Table 3-4)

B. Operational Emissions Impact Analysis

CalEEMod utilizes summer and winter EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. As such, operational activities for summer and winter scenarios are presented in Table 4.1-11, *Summary of Operational Emissions*. The existing development emissions (previously presented in Table 4.1-4) were subtracted from the Project operational emissions to determine the new emissions from the proposed Project. Detailed operational model outputs are presented in Appendices 3.2 and 3.3 of the appended Appendix B1. As indicated, Project operation-source emissions would not exceed the South Coast AQMD regional thresholds of significance for any criteria pollutants. Therefore, impacts would be less than significant, and no mitigation measures are required.

Table 4.1-11 Summary of Operational Emissions

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	2.63	2.90E-04	3.23E-02	0.00	1.20E-04	1.20E-04
Energy Source	0.02	0.18	0.15	1.11E-03	1.40E-02	1.40E-02
Mobile Source (Passenger Cars)	0.75	0.68	11.99	0.04	3.79	1.02
Mobile Source (Trucks)	0.40	13.82	3.23	0.06	2.05	0.66
On-Site Equipment Source	0.12	1.27	0.76	3.17E-03	0.04	0.04
Total Maximum Daily Emissions	3.92	15.95	16.17	0.09	5.89	1.73
<i>Existing Emissions</i>	<i>3.76</i>	<i>4.59</i>	<i>16.92</i>	<i>0.07</i>	<i>5.82</i>	<i>1.63</i>
Net Emissions (Project – Existing)	-1.65	28.24	-15.82	0.08	0.77	0.60
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO



Operational Activities – Winter Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	2.63	2.90E-04	3.23E-02	0.00	1.20E-04	1.20E-04
Energy Source	0.02	0.18	0.15	1.11E-03	1.40E-02	1.40E-02
Mobile Source (Passenger Cars)	0.77	0.75	11.00	0.03	3.79	1.02
Mobile Source (Trucks)	0.38	14.18	2.67	0.06	2.05	0.66
On-Site Equipment Source	0.12	1.27	0.76	3.17E-03	0.04	0.04
Total Maximum Daily Emissions	3.91	16.38	14.61	0.09	5.89	1.73
<i>Existing Emissions</i>	<i>3.78</i>	<i>4.80</i>	<i>13.30</i>	<i>0.07</i>	<i>5.82</i>	<i>1.63</i>
Net Emissions (Project – Existing)	0.14	11.59	1.31	0.03	0.07	0.10
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: (Urban Crossroads, 2020a, Table 3-7)

Threshold c: Would the Project expose receptors to substantial pollutant concentrations?

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, California Supreme Court held that an EIR's air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the South Coast AQMD in the Friant Ranch case (Brief), South Coast AQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. (Urban Crossroads, 2020a, p. 58)

The South Coast AQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk--it does not necessarily mean anyone will contract cancer as a result of the Project. The Brief also cites the author of the CARB methodology, which reported that a PM_{2.5} methodology is not suited for small projects and may yield unreliable results. Similarly, South Coast AQMD staff does not currently know of a way to accurately quantify O₃-related health impacts caused by NO_x or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful. (Urban Crossroads, 2020a, p. 59)

On the other hand, for extremely large regional projects (unlike the proposed Project), the South Coast AQMD states that it has been able to correlate potential health outcomes for very large emissions



sources – as part of their rulemaking activity, specifically 6,620 lbs/day of NO_x and 89,180 lbs/day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O₃. (Urban Crossroads, 2020a, p. 59)

The proposed Project does not generate anywhere near 6,620 lbs/day of NO_x or 89,190 lbs/day of VOC emissions. The proposed Project would generate 60.84 lbs/day of NO_x during construction and 16.38 lbs/day of NO_x during operations (0.92% and 0.25% of 6,620 lbs/day, respectively). The Project would also generate 28.82 lbs/day of VOC emissions during construction and 3.92 lbs/day of VOC emissions during operations (0.03% and <0.01% of 89,190 lbs/day, respectively). Therefore, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level. (Urban Crossroads, 2020a, p. 59)

Notwithstanding, this analysis does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_x, PM₁₀, and PM_{2.5} by comparing the Proposed Project's on-site emissions to the South Coast AQMD's applicable LST thresholds. As shown below, the proposed Project would not result in emissions that exceeded the South Coast AQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM₁₀, and PM_{2.5}. (Urban Crossroads, 2020a, p. 59)

A. Construction Localized Emissions Impact Analysis

Table 4.1-12, *Localized Significance Summary - Construction*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. As previously stated, the nearest receptor utilized to evaluate localized construction emissions of PM₁₀ and PM_{2.5} is the existing residential home located 165-meters from the Project site. For evaluation of localized NO_x and CO impacts, the nearest receptor is the Ross Health Care Clinic, located 23 meters north of the Project site. As previously stated, a 25-meter distance will be used consistent with the LST Methodology. As shown in, Project-related construction emissions would not exceed the South Coast AQMD LST for CO, NO_x, PM₁₀, or PM_{2.5}. (Urban Crossroads, 2020a, pp. 51-52)

Accordingly, construction of the proposed Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations. Therefore, localized emissions from construction of the Project would result in less than significant impacts with respect to Threshold c. Refer to Section 3.6 of the Project's Air Quality Impact Analysis (Appendix B1 to this EIR) for a detailed explanation of the model inputs and equations used in the analysis of construction-related localized emissions.

Furthermore, the Project will also result in some DPM which is listed carcinogenic and toxic air contaminant (TAC) in the State of California. However, given the size of the Project, the relatively small amount of construction equipment, and the relative short duration of construction activity, the Project's construction would result in negligible DPM generation and would not result in significant health risks. Accordingly, impacts arising from the generation of DPM would also be less than significant. (Urban Crossroads, 2020b, pp. 17-18)



Table 4.1-12 Localized Significance Summary - Construction

On-Site Demolition Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	31.44	21.57	3.11	1.68
South Coast AQMD Localized Threshold	172	1,480	83	25
Threshold Exceeded?	NO	NO	NO	NO
On-Site Site Preparation Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	60.79	21.85	11.14	6.46
South Coast AQMD Localized Threshold	172	1,480	83	25
Threshold Exceeded?	NO	NO	NO	NO
On-Site Grading Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	39.95	16.38	4.99	2.88
South Coast AQMD Localized Threshold	172	1,480	83	25
Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, 2020a, Table 3-9)

B. Operation Localized Emissions Impact Analysis

1. Criteria Pollutant Emissions

Table 4.1-13, *Localized Significance Summary – Operation*, presents the results of the LST analysis for long-term operation of the Project. As shown, operational emissions would not exceed the South Coast AQMD’s LSTs for any criteria pollutant at the nearest sensitive receptor. Therefore, the Project would have a less than significant localized impact during operational activity.

Table 4.1-13 Localized Significance Summary – Operation

Operational Activity	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	2.20	1.17	0.35	0.14
South Coast AQMD Localized Threshold	172	1,480	20	7
Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, 2020a, Table 3-11)

2. CO Hot Spot Impact Analysis

The Project would not result in potentially adverse CO concentrations or “hot spots.” Further, detailed modeling of Project-specific CO “hot spots” is not needed to reach this conclusion. An adverse CO concentration, known as a “hot spot”, would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the South Coast AQMD’s CEQA Air Quality Handbook (1993) (1993 CEQA Handbook), the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. (Urban Crossroads, 2020a, p. 54)



It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). (Urban Crossroads, 2020a, p. 54)

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards. Furthermore, the Bay Area Air Quality Management District (BAAQMD) concluded that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The South Coast AQMD has not undertaken a similar study, so use of the BAAQMD study is appropriate here. The busiest intersection evaluated was that at Wilshire Blvd and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations ($4.6 \text{ ppm} \times 4 = 18.4 \text{ ppm}$) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). (Urban Crossroads, 2020a, pp. 54-55)

Based on the foregoing analysis, the Project would result in less-than-significant impacts related to the creation of CO Hot Spots.

3. *Toxic Air Contaminants Impact Analysis*

Individual Exposure Scenario

As indicated in Figure 4.1-1 above, the residential land use with the greatest potential exposure to Project DPM source emissions is Location R3, which represents an existing residential home located at 2415 Wilma Avenue, approximately 540 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, R3 is placed at the residential building façade. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 0.11 in one million, which is less than the South Coast AQMD’s significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.00004, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are located at a greater distance than the scenario analyze herein, and DPM dissipates with distance from the source, all other residential receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent residences. (Urban Crossroads, 2020b, p. 18)



Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is Location R2, which represents the commerce corner commercial center at 2470 S Atlantic Boulevard, approximately 74 feet north of the Project site. R2 (See Figure 4.1-1) is placed at the building façade at this worker location. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact at this location is 0.09 in one million which is less than the South Coast AQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 0.0003, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the scenario analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers. (Urban Crossroads, 2020b, pp. 18-19)

School Child Exposure Scenario

There are no schools located within a ¼ mile of the Project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the Project. Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on CARB and South Coast AQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. (Urban Crossroads, 2020b, p. 19)

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

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant.

It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The proposed Project would also be required to comply with South Coast AQMD Rule 402 to prevent occurrences of public odor nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required. (Urban Crossroads, 2020a, p. 60)



4.1.6 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for air quality impacts is the SCAB, and the summary of projections approach based on General Plan buildout was used to evaluate the Project's potential cumulative air quality impacts. Furthermore, the South Coast AQMD considers all impacts that are significant and direct to also be cumulatively considerable.

As discussed above in the response to Threshold a, the CAAQS designate the Project site as nonattainment for O₃, PM₁₀, and PM_{2.5} while the NAAQS designate the Project site as nonattainment for O₃ and PM_{2.5}. According to the AQMD, projects that exceed the project-specific significance thresholds are considered by the South Coast AQMD to be cumulatively considerable. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. The proposed Project would not exceed the Project-specific significance thresholds. Therefore, impacts with regard to Threshold a would not be cumulatively considerable.

As previously shown in Table 4.1-10, *Maximum Daily Peak Construction Emissions Summary*, construction activities associated with the proposed Project would not exceed any of the applicable South Coast AQMD Regional Thresholds. Accordingly, impacts associated with Project-related construction emissions would be less than cumulatively considerable.

As previously shown in Table 4.1-11, *Summary of Operational Emissions*, Project operation-source emissions would not exceed the South Coast AQMD regional thresholds of significance for any criteria pollutants. Therefore, a less than significant impact is expected, and emissions would be less-than-cumulatively considerable.

As previously shown on Table 4.1-12, *Localized Significance Summary - Construction*, emissions would not exceed the South Coast AQMD Localized Threshold for CO, NO_x, PM₁₀, or PM_{2.5}. Pursuant to the South Coast AQMD's CEQA Air Quality Significance Thresholds, projects with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant impact; therefore, the Project's emissions during construction would be less than significant on a direct and cumulative basis.

As previously shown on Table 4.1-13, *Localized Significance Summary – Operation*, under long-term operating conditions, the Project's localized operational emissions would not exceed any of the South Coast AQMD LST thresholds. Pursuant to the South Coast AQMD's CEQA Air Quality Significance Thresholds, the Project would have a less-than-cumulatively considerable LST impact during long-term operation. Additionally, the Project would have no potential to result in or contribute to a CO "Hot Spot." Accordingly, impacts associated with CO "Hot Spots" would be less than cumulatively considerable.



4.1.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less-than-Significant Impact. The Project would not result in or cause NAAQS or CAAQS violations. The proposed Project is consistent with the land use and growth intensities reflected in the adopted General Plan. Furthermore, the Project would not exceed any applicable regional or local thresholds. As such, the Project is therefore considered to be consistent with the AQMP and a less than significant impact is expected.

Threshold b: Less-than-Significant Impact. The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that Project construction-source and operation-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, Project construction-source and operation-source emissions would be considered less than significant on a project-specific and cumulative basis.

Threshold c: Less-than-Significant Impact. Project emissions during construction and operation would not exceed the South Coast AQMD's LSTs for CO, NO_x, PM₁₀, or PM_{2.5}. Non-cancer risks would also be below the South Coast AQMD's threshold for direct and cumulatively considerable emissions and would be less than significant. Emissions also would not exceed LSTs and would not cause or contribute to a CO "Hot Spot."

Threshold d: Less-than-Significant Impact. Although short-term construction activities and long-term operational land uses could produce objectionable odors, compliance with standard construction requirements and regulations established by the City of Commerce and South Coast AQMD would reduce odor impacts to less-than-significant levels. Near- and long-term odor impacts would be less than significant.

4.1.8 MITIGATION

Impacts would be less than significant; therefore, mitigation is not required.

4.1.9 SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.



4.2 CULTURAL RESOURCES

The analysis in this Subsection is based on a site-specific cultural resources assessment report titled “*Cultural Resources Study for the Commerce Logistics Center Project*” prepared by Brian F. Smith and Associates, Inc. (BFSA) dated December 13, 2019. (BFSA 2019) The report is included as Appendix C, to this EIR.

All references used in this section are included in EIR Section 7.0, *References*. Confidential information has been redacted from Appendix C for purposes of public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.2.1 EXISTING CONDITIONS

A. Cultural Setting

The Project site is currently developed with two structures: one cafeteria building and one office building. The Project site was previously impacted by the development of the structures and associated landscape, as well as the general development of the area over the past 100 years. The Project site is located within the Central Basin of the Larger Los Angeles Basin, a large structural, sedimentary basin bounded and cut through by several active fault systems within the Los Angeles Metropolitan area (BFSA, 2019, p. 1.0-1). The following subsections will summarize the cultural setting of the Project area.

1. *Prehistoric Period Setting*

- “Los Angeles Man” and the Early Holocene Period (circa 26,000 to 9,000 Years Before Present [YBP]). The oldest directly dated human remains from coastal California are those of the “Los Angeles Man.” These remains were dated to 26,000 YBP, although modern scientific dating has determined this number may be inaccurate. Evidence of prehistoric human remains during the early Holocene period has been increasing on Santa Rosa Island, San Miguel Island, and San Clemente Island. This evidence suggests that archaeological sites associated with this period along coastal southern California were probably destroyed or obscured by sea level advancement or sedimentation (BFSA, 2019, 1.0-5).
- Middle Holocene Period (circa 8,000 to 5,000 YBP). Evidence suggests that after sea levels stabilized, around 7,000 YBP, a variety of depositional events were created that reshaped the landscape on which inhabitants were living. Human adaptations during the middle Holocene in the Los Angeles Basin are predominantly characterized by an abundance of grinding implements. Other characteristics of this period include stone ornaments, large projectile points, and charm stones, while bone and shell tools, ornamentation, and trade items are still rare (BFSA, 2019, 1.0-5).



- Late-Middle Holocene Period (circa 5,000 to 3,350 YBP). During the later part of the middle Holocene mortars and pestles became common, suggesting acorns became an important part of the prehistoric diet in southern California. Sites from this time period may also produce large stemmed, leaf-shaped and side-notched points, basket-hopper mortars, a variety of stone tools, bone tools, and shell ornamentation. Economies diversified with coastal communities focusing on exploiting the ocean while inland communities focused on hunting land mammals. Trade goods become more common during this period and villages appear to have been more permanent than earlier points. (BFSA, 2019, 1.0-6)
- Late Holocene or Late Horizon/European Contact (circa 3,350 YBP to 1790). During the late Holocene, population size and density increased dramatically, calling for an even more diversified economy. Ethnographic data collected from early Spanish explorer indicates that the Gabrielino/Tongva tribe was the most established tribe in the Project area. Gabrielino territory included the watersheds of San Gabriel, Santa Ana, and Los Angeles rivers, portions of the Santa Monica and Santa Ana mountains, the Los Angeles basin, the coast from Aliso Creek to Topanga Creek, and San Clemente, San Nicolas, and Santa Catalina islands. Evidence suggests that the Gabrielino were hunters and gatherers whose food sources included acorns, seeds, marine mollusks, fish, and mammals; archeological sites will often feature evidence of hunting, gathering, processing, and storage implements including arrow points, fishhooks, scrapers, grinding stones, and basketry awls. Arrival of the Spanish drastically changed life for the Gabrielino. In the early 1860s, a smallpox epidemic nearly wiped out the remaining Gabrielino population. People of Gabrielino descent still live in the Los Angeles area, but Gabrielino people are no longer listed as a culturally identifiable group as of the 1900 Federal Census. (BFSA, 2019, 1.0-5, -6)

2. Historic Setting

Newspaper articles and aerial photographs indicate that the property was originally developed in 1940 as the headquarters for the Fluor Corporation, which was founded by John Simon “Si” Fluor, Sr. Fluor’s activities had increased to such an extent that it was deemed necessary to move the firm to its present [in 1953] 27-acre location at 2500 South Atlantic Boulevard [later 5200 Sheila Street] in Los Angeles. (BFSA, 2019, 3.0-2, -8)

As indicated in the *Los Angeles Times* (1953): (BFSA, 2019, 3.0-8)

In 1912, J. Simon Fluor moved his family to California where he constructed industrial structures, bridges and factories. And as he did more and more general construction work, the more he decided to specialize ... Fluor studied the problems of the petroleum industry, designed and constructed equipment for refinery installations. The first product of the company was the “Buddha” cooling tower, introduced in 1921. In design and operation, it represented a radical advance in the cooling of water – the



first real advance since early days – and oil and gas companies were quick to recognize its outstanding features.

Southern California was the scene of a gigantic oil boom in the exciting days of 1921-22. Large fortunes were made. Rich finds were reported. To keep pace with these new-found fields, the oil and gas industries had to expand on a large scale. This meant new plant construction. And this in turn meant much to the future of Fluor.

It was in 1923 that Fluor received a contract which called for the construction of a natural gasoline plant. Although small (its capacity, 12,000 gallons per day), it opened the door to new horizons; the complete engineering, design and construction of all types of plants for processing oil and gas.

“From plan to plant” became the new flag of Fluor. The Twenties were expanding years. Concentrating on work for natural gas and petroleum customers. Fluor saw its gross sales increase tenfold from 1924 to 1929. In 1926, it introduced the Air-Cooled Muffler, a great advancement in combating exhaust noises from gas engines.

In spite of the reluctance of most businesses to expand after 1929, Fluor in 1930 opened offices in Kansas City to serve the rich Mid-Continent area. In 1933, Paola, Kansas, was selected as a site for future shops to fabricate metal products. By 1940, Fluor’s activities had increased to such an extent that it was deemed necessary to move the firm to its present [in 1953] 27-acre location at 2500 South Atlantic Boulevard [later 5200 Sheila Street] in Los Angeles.

By 1942, only a few industrial buildings were present on the property with a small office building (BFSA, 2019, Plate 3.3-2). In 1944, John Simor Floor, Sr. passed away and his sons, Peter E. Fluor and John Simon “Si” Fluor, Jr. took over management of the company. Peter Fluor passed away in 1947, and Shirley E. Meserve became president of the Fluor corporation until 1949, when Donald W. Darnell took over, holding the position until 1952. Under Darnell, the company further expanded the facility at 5200 Sheila Street. In 1950, a 27,000 square-foot-engineering building was constructed in the northwest portion of the then 27-acre property, within the current Project boundaries. That same year, the Fluor Corporation was also “engaged in building a materials testing reactor at Arco, Ida., for the Atomic Energy Commission” and “was awarded an \$8,000,000 contract for construction of a steam electric generating plant of 60,000 kilowatt capacity in San Bernardino County for the California Electric Power Co.” (BFSA, 2019, 3.0-9)

The 5200 Sheila Street (then 2500 South Atlantic Boulevard) building was further expanded in 1951 with the construction of another engineering building, by William J. Morgan Company, which was designed to match the one built in 1950. In 1952, John Fluor, Jr. was named president of the company. That year, the Fluor Corporation had three southern California offices (Los Angeles Times, 1952) and



“several new subsidiaries were organized ... including the Fluor Corporation of Canada, Ltd., Fluor Western, Inc., Fluor International, S.A., and Franco-American Construction Technique Services which is generally known as FACTS-Fluor. New sales offices were opened in October [1952] at Beirut, Lebanon, and Paris, France, and a Dominion office at Toronto Canada” (Los Angeles Times 1953). Newspaper articles also reported that by 1953, the number of southern California offices had expanded to six (San Bernardino County Sun, 1953). (BFSA, 2019, 3.0-11)

Circa 1956, the 5200 Sheila Street (then 2500 South Atlantic Boulevard) property was further expanded to include three new concrete engineering buildings, a cafeteria, a supply building, and an electrical center (Los Angeles Times 1956). The cafeteria building is still currently located within the Project boundaries and has been evaluated as part of this study. (BFSA, 2019, 3.0-12)

In 1961, the company began building silos for the United States Army and in 1962, John Simon Fluor, Sr.’s grandson, John Robert Fluor, Sr., was named CEO (Fluor Corporation 2019). In 1964, the company served “as architect-engineer for a facility to replace the sea water conversion plant recently dismantled at Point Loma in San Diego” (Los Angeles Times 1964a). In 1965, they completed construction on the first all-hydrogen refinery and the Fluor Corporation facility was expanded again with the construction of a “54,000 sq. ft. two-story structure” that served as “office space for Fluor’s engineering task force groups, construction division and customers representatives” (Los Angeles Times 1965a). The 1965 building was constructed by the William J. Moran Company, who had previously constructed the 1951 (and likely the 1950) engineering building. It is unclear exactly where the 1965 office building was constructed, however, as it could not be located on the 1965 aerial photograph. (BFSA, 2019, 3.0-12)

In 1966, the four-story office building currently located within the Project boundaries, which has been evaluated as part of this study, was constructed as a “100,800 sq. ft., four-story office addition to an existing engineering and construction office and yard.” The initial framing for the building can be seen in the 1965 aerial photograph of the property. Also built by the William J. Moran Company, the 1966 office building was designed by architect John Philip Joseph “in [the] contemporary style”. The Los Angeles Times (1966b) reported that the building was constructed using reinforced concrete and featured “a 43-foot wide vertical panel of ceramic tile” that extended from the ground to the roof in the center of the north façade, framing the main entrance. The building was meant to “provide space for engineering task force groups, the finance department, customer’s representatives, and executive offices.” (BFSA, 2019, 3.0-12)

In the 1970s, Fluor Corporation continued to advance into new markets, including constructing the Joseph M. Farley Nuclear Plant, designing and engineering the world’s first offshore plant “for the recovery, storage, and loading of natural gas,” constructing the Alaska Pipeline, and securing their largest contract to date in 1975, a five-billion-dollar engineering, procurement, and construction management assistance project for Aramco in Saudi Arabia. In 1974, Fluor Corporation broke ground



on a new multi-story headquarters building in Irvine, California. Two years later, they relocated to the new facility and sold the 5200 Sheila Street property (then 2500 South Atlantic Boulevard) to the Santa Fe Land Improvement Company (SFLIC) (Fluor Corporation 2019; Los Angeles Times 1978; Kinchen 1979a), who would “occupy a minimum of three buildings at the Atlantic Blvd. property and the remainder will be developed for lease to other companies.” (BFSA, 2019, 3.0-12)

Upon purchasing the property in 1978, the SFLIC renamed the site “Santa Fe Plaza,” the 1950 and 1951 engineering buildings the “Atchison and Topeka” buildings, and the 1966 office building the “Santa Fe” building. The complex housed the Santa Fe Railway, SFLIC, and the Santa Fe West Credit Union. The SFLIC also remodeled the complex at that time by retrofitting the Santa Fe building through the application of exterior Dryvit polystyrene insulating panels covered in Quarzputz stucco and adding a smoke-colored glass canopy between the three buildings. The architect for the remodel was Albert C. Martin and Associates and the general contractor was Robert E. McKee, Inc. The Dryvit panel system was applied by the George Raymond Company.

The SFLIC owned the property until at least 1988, and in 1991, the property was both listed as “unclaimed” as part of the Edward Hawkins Estate that was managed by executor Jay Gregory, and as being owned by Certified Grocers. Circa 2000, the property was transferred to United Western Grocers, Inc. Historic and aerial photographs indicate that the Atchison and Topeka buildings were demolished between 1979 and 1994.

B. South Central Coastal Information Center (SCCIC) Findings

An archeological records search was performed by BFSA for the Project at the SCCIC at CSU Fullerton in order to assess previous archaeological studies and identify any previously recorded archaeological sites within the Project boundaries or in the immediate vicinity. SCCIC records indicated that no previously recorded resources are located within the Project Site (BFSA, 2019, p. vi).

The SCCIC records identified two historic aged buildings on site. The buildings were recorded with the SCCIC as Temp-1 and evaluated for significance (see Subsection 4.2.4, *Impact Analysis*).

4.2.2 REGULATORY FRAMEWORK

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of Los Angeles County in history, architecture, archaeology, engineering, and culture.

1. California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register of Historical Resources (CRHR). The CRHR is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.



The CRHR consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places.
- California Registered Historical Landmarks from No. 0770 onward.
- California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the CRHR.

2. *California Environmental Quality Act*

A number of criteria are used in demonstrating resource importance. Specifically, the criteria outlined in CEQA provide the guidance for making such a determination, as provided below. According to CEQA (§15064.5a), the term “historical resource” includes the following:

- 1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the CRHR (Public Resources Code [PRC] SS5024.1, Title 14 CCR. Section 4850 et seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC SS5024.1, Title 14, Section 4852) including the following:
 - a) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 - b) Is associated with the lives of persons important in our past;



- c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d) Has yielded, or may be likely to yield, information important in prehistory or history.
- 4) The fact that a resource is not listed in, or determined eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the PRC), or identified in a historical resources survey (meeting the criteria in Section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or 5024.1.

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect upon the environment. CEQA defines a substantial adverse change as:

- 1) Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.
- 2) The significance of a historical resource is materially impaired when a project:
 - a) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
 - b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or,
 - c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects upon archaeological sites and contains the following additional provisions regarding archaeological sites:



1. When a project will impact an archaeological site, a lead agency shall first determine whether the site is a historical resource, as defined in subsection (a).
2. If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.
3. If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC Section 21083.2 (c to f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
4. If an archaeological resource is neither a unique archaeological nor historical resource, the effects of the project upon those resources shall not be considered a significant effect upon the environment. It shall be sufficient that both the resource and the effect upon it are noted in the Initial Study (IS) or Environmental Impact Report, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

3. *California Public Resources Code*

Archaeological, paleontological, and historical sites are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural and paleontological resources are recognized as nonrenewable resources and therefore receive protection under the California Public Resources Code and CEQA.

- **California Public Resources Code 5020–5029.5** continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- **California Public Resources Code 5079–5079.65** defines the functions and duties of the OHP. The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.
- **California Public Resources Code 5097.5** prohibits a person from moving, destroying, injuring, or defacing, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.



- **California Public Resources Code 5097.9–5097.991** provides protection to Native American historical and cultural resources, and sacred sites and identifies the powers and duties of the Native American Heritage Commission. It also requires notification of discoveries of Native American human remains to descendants and provides for treatment and disposition of human remains and associated grave goods.

4.2.3 BASIS FOR DETERMINING SIGNIFICANCE

Based on the current Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact related to cultural resources if the Project or any Project-related component would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5;*
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5; and/or*
- Disturb any human remains, including those interred outside of formal cemeteries.*

As substantiated in the Initial Study prepared for the Project, the possibility of uncovering human remains during Project-related grading activities is remote due to fact that the previous development of the site has substantially disturbed the subsurface of the site. Pursuant to California Health and Safety Code Section 7050.5, in the unlikely event human remains are encountered during ground-disturbing activities, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. Mandatory compliance with these requirements would ensure that no impacts associated with the discovery of human remains would occur, and Threshold c) will not be evaluated further in this analysis.

4.2.4 IMPACT ANALYSIS

Threshold a: *Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5;*

The proposed Project would require demolition of existing historic age buildings the Fluor Corporation office and cafeteria buildings. The existing buildings were recorded with the SCCIC as Temp-1 and evaluated for significance. Under CEQA, a project has a significant impact on a historical resource if it “would result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). Material impairment would occur if the project would result in demolition or material alteration of those physical characteristics that convey the resource’s historical significance (CEQA Guidelines Section 15064.5(b)(2)).



When evaluating a historic resource, integrity is the authenticity of the resource's physical identity, which is indicated by the retention of characteristics that existed during its period of construction. It is important to note that "integrity" is not the same as "condition." Integrity directly relates to the presence or absence of historic materials and character-defining features, while condition relates to the relative state of physical deterioration of the resource. In most instances, integrity is more relevant to the significance of a resource than condition; however, if a resource is in such poor condition that original materials and features may no longer be salvageable, then the resource's integrity may be adversely impacted.

A. CRHR Evaluation

For a historic resource to be eligible for listing on the CRHR, the resource must be found significant at the local, state, or national level, under one or more of the following criteria: (BFSA, 2019, 3.0-39)

CRHR Criterion 1: *It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.* Although the "Santa Fe" office building and cafeteria building are the only remaining structures associated with the original Fluor Corporation engineering and construction complex, they were constructed over a decade after the company headquarters was established at this location in 1940. By the time the buildings were constructed between 1956 and 1966, Fluor Corporation had expanded to several additional locations throughout California and the rest of the world and neither building is specifically associated with any technological advancements made by the company. Because the buildings could not be associated with any specific historic event and they are not representative of the original 1940 Fluor Corporation complex, they are not eligible for designation under CRHR Criterion 1. (BFSA, 2019, 3.0-40)

CRHR Criterion 2: *It is associated with the lives of persons important in our past.* Historical research revealed that the "Santa Fe" office building and cafeteria building could not be associated with any persons important in our past. Therefore, the buildings are not eligible for designation under CRHR Criterion 2. (BFSA, 2019, 3.0-40)

CRHR Criterion 3: *It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.* Due to the modifications that the "Santa Fe" office building and cafeteria building have undergone since their initial construction, neither embodies the distinctive characteristics of a type, period, region, or method of construction and neither was designed or built by an important creative individual. Although the 1966 office building was constructed by the William J. Moran Company, who built several of the other Fluor Corporation complex buildings, and was designed by architect John Phillip Joseph, it has been so extensively modified since its initial construction that it is no longer



representative of either's work. In addition, neither building possesses high artistic values. (BFSA, 2019, 3.0-40)

The William J. Moran Company was established by William J. Moran, Sr. circa 1921. Moran was born in Colorado in 1884 to Irish immigrants, Michael and Mary (née Flannery) Moran (see Appendix C, Plate 3.3–30).

In 1920, William and Elinore Moran's son, William J. Moran, Jr., was born in Muncie. That same year, the Moran brothers ceased to be involved with the W.E. Wood Company and relocated to California shortly thereafter. Once in California, they opened the William J. Moran Company, an engineering and construction company whose first known project was the construction of a factory at Sixteenth Street and Pacific Avenue in Los Angeles in 1921. (BFSA, 2019, 3.0-41)

In the early 1930s, "Engineer William J. Moran" constructed brick buildings at 3369 Mines Avenue and 1010 Maple Avenue, and a wood frame and galvanized iron factory at 6666 Lexington Avenue. In 1936, Moran engineered a concrete linseed oil refining plant at 305 Badger Avenue, factory buildings at 3030 East Pico Street and 1856 East Fifteenth Street, and a storage building at 1861 East Fifty-fifth Street. In 1941, "William J. Moran, Alhambra construction engineer" built a plant for "Rite Hardware Co., Los Angeles builder of aircraft parts." (BFSA, 2019, 3.0-41)

The 5200 Sheila Street buildings were engineered and constructed by the William J. Moran Company while it was operated by William Moran, Jr. Although the company was influential in the development of several industrial and commercial buildings in the Los Angeles area, neither William J. Moran, Jr. nor his father are considered master engineers. In addition, because the buildings were substantially modified after the SFLIC purchased the property in 1979, the "Santa Fe" office building is not representative of the work of the William J. Moran Company. (BFSA, 2019, 3.0-42)

In 1955, John Phillip Joseph was named "designer and project architect" for the William J. Morgan Company. Circa 1970, Joseph began working with engineers Hugh Brooks and Associates of Alhambra, for whom he designed the Sanford Paris building at Sherman Way and Tujunga Avenue in North Hollywood. All of the buildings designed by Joseph were done so in the "contemporary design," most of which incorporated precast concrete and/or floor-to-ceiling glass. Although both Joseph and the Moran Company built numerous buildings within the Los Angeles area, the modifications made to the "Santa Fe" office building have adversely impacted its association with them. In addition, the cafeteria building is not associated with any known architect or builder and has also been extensively modified. Therefore, based upon the information listed above, the buildings are not eligible for designation under CRHR Criterion 3. (BFSA, 2019, 3.0-44)



CRHR Criterion 4: *It has yielded, or may be likely to yield, information important in prehistory or history.* The research conducted for the study revealed that because the “Santa Fe” office building and cafeteria building are not associated with any significant persons or events and were not constructed using unique or innovative methods of construction, they likely cannot yield any additional information about the history of the City of Commerce or the State of California. Therefore, the buildings are not eligible for designation under CRHR Criterion 4. (BFSA, 2019, 3.0-45)

The “Santa Fe” office building and cafeteria building located at 5200 Sheila Street (Temp-1) have been evaluated as not historically or architecturally significant under any CEQA criteria due to a lack of contribution to broad patterns of California’s history, association with persons important to our past, distinctive characteristics, and information important to prehistory or history. Because the buildings are not eligible for listing on the CRHR, demolition of the buildings would not result in a significant impact to historical resources.

B. Integrity Evaluations

BFSA also reviewed the buildings based the recommended criteria listed in the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. This review is based upon the evaluation of the integrity of the buildings followed by the assessment of distinctive characteristics. (BFSA, 2019, 3.0-36)

1. **Integrity of Location** *[refers to] the place where the historic property was constructed or the place where the historic event occurred.* Integrity of location was assessed by reviewing historical records and aerial photographs in order to determine if the buildings had always existed at their present locations or if they had been moved, rebuilt, or their footprints significantly altered. Historical research revealed that the “Santa Fe” office building and cafeteria building located at 5200 Sheila Street were constructed in their current locations between 1956 and 1966. Therefore, both buildings retain integrity of location. (BFSA, 2019, 3.0-36)
2. **Integrity of Design** *[refers to] the combination of elements that create the form, plan, space, structure, and style of a property.* Integrity of design was assessed by evaluating the spatial arrangement of the buildings and any architectural features present. (BFSA, 2019, 3.0-36)
 - a. **Circa 1956 Cafeteria Building:** The International-style cafeteria building was constructed circa 1956. The International style was a major worldwide architectural trend of the 1920s and 1930s and reflects the formative decades of Modernism prior to World War II. Although the modern International style originated in western Europe, it transcended any national or regional identity because modern International-style architecture made no reference to local vernaculars or traditional building forms. The style quickly migrated to the



United States as architects from Europe fled prior to World War II. In Los Angeles, immigrant architects Rudolph Schindler and Richard Neutra were instrumental in popularizing the modern International style. The style was most popular in southern California beginning in the 1950s. (BFSA, 2019, 3.0-36)

Common features of modern International-style architecture include a “flat roof, usually without a ledge (coping) at the roof line; windows set flush with the outer walls; smooth unadorned surfaces with no decorative detailing at doors or windows; façade composition commonly includes large window groupings, often linear; and expanses of windowless wall surface; unified wall cladding, generally white stucco; commonly asymmetrical.” The cafeteria building features smooth, unadorned surfaces, its façades are composed of large, linear window groupings, and it is asymmetrical; however, while it likely possessed a unified wall cladding and flush windows, the application of the Dryvit panels and Quarzputz stucco in 1979 modified the building’s exterior, including the areas around the windows. The building has also never possessed a flat roof. The addition of the flat overhangs introduced Contemporary-style elements and the replacement of the original exterior cladding with Quarzputz altered the outward appearance of the building. Therefore, the cafeteria building does not retain integrity of design. (BFSA, 2019, 3.0-37)

1966 “Santa Fe” Office Building: The “Santa Fe” office building was originally constructed in 1966 in a combination of the International and Contemporary architectural styles. International-style features that the building originally possessed include: a flat roof without coping at the roofline; windows set flush with the outer walls; façades with large, linear window groupings; expanses of windowless wall surface; and likely a unified wall surface. Contemporary-style features that the building originally possessed include the “eyebrow overhangs,” which were common on commercial structures in the 1960s. The changes made to the building since its initial construction include: application of Dryvit panels and Quarzputz stucco in 1979; construction of the loading dock addition at the southeast corner between 1994 and 2003; removal of the 43-foot-wide, ceramic tile veneer from the main entrance at an unknown date; and the likely replacement of all original windows after the 1960s. Due to these modifications, which altered the building’s outward appearance and modified character-defining features of the original International and Contemporary styles in which it was designed, it does not retain integrity of design. (BFSA, 2019, 3.0-37)



3. **Integrity of Setting** *[refers to] the physical environment of a historic property. Setting includes elements such as topographic features, open space, viewshed, landscape, vegetation, and artificial features.* Integrity of setting was assessed by inspecting the elements of the property, which include topographic features, open space, views, landscape, vegetation, man-made features, and relationships between buildings and other features. The two historic buildings within the project were constructed between 1956 and 1966. During this time, the surrounding area consisted of an engineering and construction complex operated by the Fluor Corporation. Circa 1956, when the cafeteria building was constructed, it was surrounded by one- and two-story structures that served as office buildings and manufacturing and storage facilities (see Appendix C, Plate 3.3–8). When the four-story “Santa Fe” office building was constructed in 1966, it replaced another smaller structure and towered over the other buildings, which negatively impacted the cafeteria building. When the SFLIC purchased the property in the late 1970s, they replaced several buildings on the northern end of the property with a lobby and parking area and replaced two manufacturing/storage buildings located southwest of the cafeteria and “Santa Fe” office buildings with a large warehouse structure. Between 1979 and 1994 (see Appendix C, Plates 3.3–9, 3.3–10, and 3.3–12), the two office buildings north of the “Santa Fe” office building and the lobby were demolished, which further impacted the buildings’ original setting. Due to the substantial modifications made to the original Fluor Corporation complex since 1956, neither building retains integrity of setting. (BFSA, 2019, 3.0-37)
4. **Integrity of Materials** *[refers to] the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.* Integrity of materials was assessed by determining the presence or absence of original building materials, as well as the possible introduction of materials that may have altered the architectural design of the buildings. (BFSA, 2019, 3.0-38)
 - a. **Circa 1956 Cafeteria Building:** Since its original construction, the cafeteria building has undergone various modifications that resulted in the removal of original materials and the introduction of new materials, including the addition of flat overhangs over doors and windows after the 1950s and the application of Dryvit panels and/or Quarzputz stucco in 1979. Due to the introduction of new materials that encompass all façades of the building, it does not retain integrity of materials. (BFSA, 2019, 3.0-38)
 - b. **1966 “Santa Fe” Office Building:** Since its original construction, the “Santa Fe” office building has undergone several significant alterations, modifications, and material replacements, including: application of Dryvit panels and Quarzputz stucco in 1979; construction of a loading dock addition on the southeast corner between 1994 and 2003; removal of the 43-foot-wide,



ceramic tile veneer from the main entrance at an unknown date; and the likely replacement of all original windows after the 1960s. Due to the introduction of so many new materials and the removal of some original materials, the building does not retain integrity of materials. (BFSA, 2019, 3.0-38)

5. **Integrity of Workmanship** *[refers to] the physical evidence of the labor and skill of a particular culture or people during any given period in history.* Integrity of workmanship was assessed by evaluating the quality of the architectural features present in the buildings. The original workmanship demonstrated by the construction of the “Santa Fe” office building and cafeteria building appears to have been average. While the non-original portions of the buildings also appear to have been constructed using the same level of workmanship, the extensive modifications made since their original construction impacted the initial workmanship they once portrayed. In addition, neither building is representative of the labor or skill of a particular culture or people. Therefore, neither building retains integrity of workmanship. (BFSA, 2019, 3.0-38)
6. **Integrity of Feeling** *[refers to] a property’s expression of the aesthetic or historic sense of a particular period of time.* Integrity of feeling was assessed by evaluating whether or not the resources’ features, in combination with their setting, convey a historic sense of the property during their period(s) of construction. As noted previously, the integrity of setting for the buildings has been lost. In addition, modifications affecting the outward appearance of both buildings have negatively impacted their original appearance. Therefore, neither building retains integrity of feeling. (BFSA, 2019, 3.0-39)
7. **Integrity of Association** *[refers to] the direct link between an important historic event or person and a historic property.* Integrity of association was assessed by evaluating the resources’ data or information and their ability to answer any research questions relevant to the history of the Commerce area or the state of California. Historical research indicates that the buildings were originally associated with the Fluor Corporation engineering and construction complex. Although the “Santa Fe” office building and cafeteria building located at 5200 Sheila Street are two of the only remaining buildings associated with the complex, their overall loss of integrity has negatively impacted their ability to convey that association. Therefore, the buildings do not retain integrity of association. (BFSA, 2019, 3.0-39)

The “Santa Fe” office building and cafeteria building located at 5200 Sheila Street were determined to meet only one category of the integrity analysis: location. The buildings have been evaluated as not retaining integrity of setting, materials, design, workmanship, feeling, or association due to remodeling/modifications and an inability to convey an association with the original Fluor Corporation complex within which they constructed. (BFSA, 2019, 3.0-39) Therefore, the existing buildings are not considered historical resources. As a result, the Project site will have no impact on any historical



resources and therefore will not result in significant impact on any historical resources pursuant to § 15064.5.

C. Local Register of Historical Resources

The City of Commerce General Plan indicates that there are several known points of local and statewide historical interest, three of which are officially commemorated: (1) the Uniroyal Tire Plant, (2) the Pillsbury Mill, and (3) the Vail Landing Field. The Uniroyal Tire Plant and the Pillsbury mill are listed on the State Register of Historical Places. The General Plan further lists the following sites as “sites of interest:” The Union Pacific Train Station; the Mount Olive; the Russian Molokan Christian Spiritual Jumpers Lemente, and Mount Carmel ethnic cemeteries; and the 1942 Sleepy Lagoon Murder site. The nearest site of interest is the Sleepy Lagoon Murder site approximately 0.44 miles from the site. Because these sites are not within proximity or adjacent to the Project site, Project activities would not result in any impacts to the General Plan’s sites of interest. The General Plan does not designate the Project site as a historical resource, and BfSA further established that the office buildings are not historically significant under any CEQA criteria (BfSA, 2019, p 3.0-45). Therefore, development of the Project would not impact any locally designated historical resources.

Threshold b: *Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5*

Based on the results of the SCCCIC records review no previously recorded archaeological resources are located within the subject property. As indicated above, the buildings located on site have been recorded with the SCCIC as Temp-1 and are not considered historical resources. However, there is a potential that archeological resources or historic deposits may be present that are related to the occupation of this location since 1940. Grading into areas of previously undisturbed soils have the potential to adversely impact previously unrecorded resources. Impacts to archaeological resources are considered potentially significant, since buried or obscured archaeological resources may be encountered during construction.

4.2.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As noted above under Threshold a, the Project site would not impact any historical resources. Therefore, the proposed Project would not result in a cumulatively considerable impact to historic resources.

As noted under Threshold b, the Project site does not contain known archeological site or resources. Therefore, the proposed Project would not result in a cumulatively considerable impact to any known archaeological sites or resources. Although the historic buildings are not CEQA-significant, the potential exists that unidentified significant historic deposits may be present that are related to the



occupation of this location since 1904. Because of this potential to encounter buried cultural deposits, the Project would result in potentially significant impacts. Impacts to such resources have the potential to be significant if they are not properly identified and treated. Therefore, the Project's potential impacts to unearthed archeological resources during the Project's construction activities would not be cumulatively considerable.

4.2.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less than Significant Impact. The Project site does not contain any historical sites or resources. Therefore, the Project would not impact any historical sites or resources. Accordingly, impacts to any historical sites or resources would be less-than-significant.

Threshold b: Potentially Significant Impact. The Project site does not contain any known archeological sites or resources. However, although the historic buildings are not historically or architecturally significant, the potential exists for unidentified archaeological resources or historic deposits to be present. Because of this potential to encounter buried cultural deposits, impacts to such resources have the potential to be significant if they are not properly identified and treated.

4.2.7 MITIGATION MEASURE

MM 4.2-1 Prior to the issuance of a grading permit, the project applicant shall retain a archaeological monitor to be present full-time during all soil disturbing and grading/excavation/trenching activities. Monitor(s) shall be present during grading/excavation/trenching. The archaeological monitor shall be present full-time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources. The principal investigator (PI) may submit a detailed letter to the lead agency during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

MM 4.2-2 If historic or prehistoric archaeological resources are discovered during grading activities, the archaeological monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the Native American monitor. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.

- a. The PI shall evaluate the significance of the resource. The PI shall immediately notify the City of Commerce to discuss the significance determination and shall also submit a letter indicating whether additional mitigation is required. If the



resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) that has also been reviewed by the Native American consultant/monitor, and obtain written approval from the City of Commerce to implement that program. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. If the resource is not significant, the PI shall submit a letter to the City of Commerce indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that that no further work is required.

- b. If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains. The following procedures, as set forth in CEQA Section 15064.5(e), the California PRC (Section 5097.98), and the State Health and Safety Code (Section 7050.5), shall then be undertaken: 1) The archaeological monitor shall notify the PI, if the monitor is not qualified as a PI, and the PI shall notify the Los Angeles County Medical Examiner-Coroner after consultation with the City of Commerce, either in person or via telephone; and 2) Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner-coroner in consultation with the PI concerning the provenance of the remains, and the medical examiner-coroner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
 - If human remains are determined to be Native American, the medical examiner-coroner or the designated custodian of the remains will notify the NAHC within 24 hours. The NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. The MLD will contact the PI within 24 hours or sooner after the medical examiner-coroner has completed coordination to begin the consultation process in accordance with CEQA Section 15064.5(e), the California PRC, and the State Health and Safety Code. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods. Disposition of Native American human remains will be determined between the MLD and the PI.
 - If human remains are not Native American, the PI shall contact the medical examiner-coroner and notify them of the historic-era context of the burial. The medical examiner-coroner will determine the appropriate course of



action with the PI and city staff (PRC 5097.98). If the remains are of historic origin, they shall be appropriately removed and conveyed to the City of Commerce. The decision for internment of the human remains shall be made in consultation with City, the applicant/landowner, and any known descendant group.

- MM 4.2-3 Prior to issuance of an occupancy permit, the PI shall submit to the City of Commerce a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program (with appropriate graphics). For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report. Recording sites with the State of California DPR shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring program. The PI shall submit a revised draft monitoring report to the City of Commerce for approval, including any changes or clarifications requested by the City. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. The cost for curation is the responsibility of the property owner. The PI shall submit the approved final monitoring report to the City of Commerce and any interested parties.

4.2.8 SIGNIFICANT OF IMPACTS AFTER MITIGATION

Thresholds b: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.2-1 would ensure that appropriate measures are incorporated into future construction activities to identify and properly treat inadvertent discovery of items of cultural significance. With the implementation of the required mitigation, impacts to archaeological items would be reduced to less than significant levels.



4.3 ENERGY

This Subsection is based in part on the information provided in the Project's Energy Analysis Report, dated October 6, 2020, and appended to this EIR as Appendix D (Urban Crossroads, 2020d).

4.3.1 EXISTING CONDITIONS

A. Electricity Consumption

Electricity is provided to the Project site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. (Urban Crossroads, 2020d, pp. 9-10)

B. Natural Gas Consumption

Natural gas is provided to the Project site by Southern California Gas Company (SoCalGas) which is regulated by the California Public Utilities Commission (CPUC). The CPUC regulates natural gas utility service for approximately 10.8 million customers and oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State of California. In 2012, California customers received 35% of their natural gas supply from basins located in the Southwest, 16% from Canada, 40% from the Rocky Mountains, and 9% from basins located within California. (Urban Crossroads, 2020d, pp. 10-12)

C. Transportation Energy / Fuel Consumption

Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. In March 2018, the Department of Motor Vehicles (DMV) identified 35 million registered vehicles in California, and those vehicles consume an estimated 19 billion gallons of fuel each year. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. Petroleum comprises about 92% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. (Urban Crossroads, 2020d, pp. 12-13)

4.3.2 REGULATORY FRAMEWORK

A. Federal Policies and Regulations

1. *Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)*

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related



factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. (Urban Crossroads, 2020d, p. 15)

2. The Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of wise transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, 2020d, p. 15)

B. State Policies and Regulations

1. Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code § 25301a)]. The Energy Commission prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report. (Urban Crossroads, 2020d, p. 16)

The 2019 IEPR was adopted January 31, 2020, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2019 IEPR focuses on a variety of topics such as including the environmental performance of the electricity generation system, landscape-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, updates on Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and the California Energy Demand Forecast. The 2020 IEPR Update is currently in progress but is not anticipated to be adopted until February 2021. (Urban Crossroads, 2020d, p. 16)

2. State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies,



including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

3. California Code Title 24, Part 6, Energy Efficiency Standards

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The 2019 Title 24 standards are applicable to building permit applications submitted on or after January 1, 2020. The 2019 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, update indoor and outdoor lighting for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7 percent less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will about 53 percent less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30 percent less energy due to lighting upgrades. (Urban Crossroads, 2020d, p. 17)

4.3.3 METHODOLOGY

Information from the CalEEMod 2016.3.2 outputs for the Project's Air Quality Impact Analysis (EIR Appendix B1) was utilized in the Project's Energy Analysis (EIR Appendix D) and the analysis presented herein, detailing Project-related construction equipment, transportation energy demands, and facility energy demands. These outputs are referenced in Appendix 3.1 of EIR Appendix B1. Additionally, the 2017 version of the Emissions FAcT (EMFAC) developed by the California Air Resources Board (CARB) was used to calculate emission rates, fuel consumption, and vehicle miles traveled (VMT) for light duty vehicles traveling to and from the Project site during the Project's construction and operational activities. Data from the EMFAC 2017 model outputs are included in Appendix 3.1 and 3.2 of the Project's Energy Analysis (EIR Appendix D).

4.3.4 BASIS FOR DETERMINING SIGNIFICANCE

The proposed Project would result in a significant impact to energy if the Project or any Project-related component would:

- a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or*
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*



The above-listed thresholds are derived directly from Section VI of Appendix G to the CEQA Guidelines and address typical adverse effects to energy resources (OPR, 2018).

4.3.5 IMPACT ANALYSIS

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

A. Energy Use During Project Construction

Based on the 2017 National Construction Estimator, the typical power cost per 1,000 sf of construction per month is estimated to be \$2.32. The Project plans to implement 45,959 sf of general light industrial use (40 % of the total square footage) and 68,939 sf of warehouse use (60% of the total square footage) for a total of 114,898 sf within a single building. The Project is anticipated to be developed within a 17-month period. The total power cost of the on-site electricity usage during the construction of the proposed Project is estimated to be approximately \$9,711.43. Additionally, as of January 1, 2020, SCE's general service rate schedule (GS-1) for an industrial land uses is \$0.08 per kilowatt hours (kWh) of electricity. The total electricity usage from on-site Project construction related activities is estimated to be approximately 121,552 kWh. (Urban Crossroads, 2020d, p. 21)

Project construction would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. Project construction activities would consume an estimated 74,294 gallons of diesel fuel during construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower-hour per gallon (hp-hr/gal). For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered which is standard practice consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving the City and region. (Urban Crossroads, 2020d, p. 22)

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. With respect to estimated VMT, the construction worker trips would generate an estimated 385,728 VMT. Approximately 12,642 gallons of fuel would be consumed in relation to construction worker trips during construction of the Project. Project construction worker trips would represent a "single-event" gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose. (Urban Crossroads, 2020d, p. 24)

Construction vendor trips would generate an estimated 1,005,480 VMT along area roadways. It is assumed that 50% of all vendor trips are from Medium-Heavy-Duty-Trucks (MHDT), 50% of vendor trips are from Heavy-Heavy-Duty Trucks (HHDT), and 100% of hauling trips are from HHDTs. It is estimated that 3,597 gallons of fuel would be consumed in relation to construction vendor trips (MHDTs). (Urban Crossroads, 2020d, pp. 24-25)



1. *Construction Energy Efficiency and Conservation Measures*

The equipment used for Project construction would conform to CARB regulations and California emissions standards. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2020d, p. 25)

The Project would utilize construction contractors which practice compliance with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Additionally, certain incidental construction-source energy efficiencies would likely accrue through implementation of California regulations and best available control measures (BACM). Indirectly, construction energy efficiencies and energy conservation would be achieved for the proposed development through energy efficiencies realized from bulk purchase, transport and use of construction materials. (Urban Crossroads, 2020d, p. 26)

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2020d, p. 26)

B. *Energy Use During Project Operation*

1. *Transportation Energy Demands*

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. As summarized on Table 4.3-1, *Project-Generated Traffic Annual Fuel Consumption (All Vehicles)*, Urban Crossroads calculates that the Project will result in 2,173,626 annual VMT and an estimated annual fuel consumption of 138,783 gallons of fuel. (Urban Crossroads, 2020d, p. 26)



Table 4.3-1 Project-Generated Traffic Annual Fuel Consumption (All Vehicles)

Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption (gallons)
LDA	925,134	29,835
LDT1	76,125	2,892
LDT2	345,433	14,049
MDV	203,725	10,165
LHDT	116,141	8,693
MHDT	137,411	15,319
HHDT	369,657	57,830

(Urban Crossroads, 2020d, Table 4-16)

2. Facility Energy Demands

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, CALGreen; CCR, Title 24, Part 11, governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or “plug-in” energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). (Urban Crossroads, 2020d, p. 30)

Project building operations and Project site maintenance activities would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by SoCalGas; electricity would be supplied to the Project by SCE. Annual natural gas and electricity demands of the Project are summarized in Table 4.3-2, *Project Annual Operational Energy Demand Summary*. (Urban Crossroads, 2020d, pp. 30-31)

Table 4.3-2 Project Annual Operational Energy Demand Summary

Natural Gas Demand	kBTU/yr	Electricity Demand	kWh/yr
General Light Industrial	643,886	General Light Industrial	436,611
Other Asphalt Surfaces	0	Other Asphalt Surfaces	0
Other Non-Asphalt Surfaces	0	Other Non-Asphalt Surfaces	0
Parking Lot	0	Parking Lot	16,240
Warehouse	42,742	Warehouse	246,468
Total Project Natural Gas Demand	686,628	Total Project Electricity Demand	669,319

(Urban Crossroads, 2020d, Table 4-17)

(Urban Crossroads, 2020d, Table 4-18)

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). The Project would also not result in a substantial increase in demand for transmission service, resulting in the need



for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure (other than site-adjacent and on-site connects to local utilities). (Urban Crossroads, 2020d, p. 31)

C. Energy Consumption Summary

With respect to construction, the estimated power cost of on-site electricity usage during the construction of the proposed Project is assumed to be approximately \$9,711.43. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction, after full Project build-out, is calculated to be around 121,552 kWh. Construction equipment used by the Project would result in single event consumption of approximately 74,294 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. Construction worker trips for full construction of the proposed Project would result in the estimated fuel consumption of 12,642 gallons of fuel. Additionally, fuel consumption from construction vendor trips (MHDTs and HHDTs) will total approximately 159,792 gallons. Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2020d, p. 31)

With respect to transportation, the total estimated annual fuel consumption from Project generated VMT would result in a fuel demand 138,783 gallons of fuel. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Ed., 2017); and CalEEMod. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Furthermore, location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project would include sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2020d, p. 32)

With respect to Project building operation, the Project facility operational energy demands are estimated at: 686,628 kBTU/yr of natural gas; and 669,319 kWh/yr of electricity. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration. (Urban Crossroads, 2020d, pp. 32-33)



As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. (Urban Crossroads, 2020d, p. 35)

Threshold b: *Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The following section analyzes the proposed Project's consistency with the applicable federal and State regulations previously described under Subsection 4.3.2, *Regulatory Framework*.

A. Project Consistency with Federal Energy Regulations

1. *Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)*

Transportation and access to the Project site is provided primarily by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2020d, p. 15)

2. *The Transportation Equity Act for the 21st Century (TEA-21)*

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. (Urban Crossroads, 2020d, p. 15)

B. State Policies and Regulations

1. *Integrated Energy Policy Report*

Electricity would be provided to the Project by SCE and natural gas is provided by SoCalGas. SCE's Clean Power and Electrification Pathway (CPEP) white paper and SoCalGas 2018 Corporate Sustainability Report builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation of the goals presented in the 2019 IEPR. (Urban Crossroads, 2020d, p. 16)

2. *State of California Energy Plan*

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and acts to reduce vehicle miles traveled by developing industrial uses on a heavy industrial-designated site. The Project therefore is



consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, 2020d, p. 16)

3. *California Code Title 24, Part 6, Energy Efficiency Standards*

The Project will design building shells and building components, such as windows; roof systems; electrical and lighting systems; and heating, ventilating, and air conditioning systems to meet 2019 Title 24 Standard. As such, the analysis herein assumes compliance with the 2019 Title 24 Standards.

C. Regulatory Consistency Summary

The proposed Project is subject to California Building Code requirements. New buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements. (Urban Crossroads, 2020d, p. 35)

The Project would provide for, and promote, energy efficiencies equal to or beyond those required under other applicable federal and State of California standards and regulations, and in so doing would meet or exceed all California Building Standards Code Title 24 standards. Moreover, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other residential and commercial uses of similar scale and intensity that are constructed and operating in California. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the Project would not cause or result in the need for additional energy producing facilities or energy delivery systems. (Urban Crossroads, 2020d, p. 35)

4.3.6 CUMULATIVE IMPACT ANALYSIS

The areas considered for cumulative impacts to electricity and natural gas supplies are the service areas of the SCE and SoCalGas, respectively, described above in Section 4.3.1. Other projects would generate increased electricity and natural gas demands. However, all projects within the SCE and SoCalGas service areas would be required to comply with the Building Energy Efficiency Standards and CALGreen, which would contribute in minimizing wasteful energy consumption. Therefore, cumulative impacts would be less than significant, and project impacts would not be cumulatively considerable.

Buildout of the Project, related projects, and additional forecasted growth in SCE's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. SCE forecasts that its total retail sales in the 2020 fiscal year will be 82,223 GWh of electricity. Based on the Project's estimated electrical consumption of 669,319 kWh/year, the Project would account for less than 0.003 percent of SCE's total projected retail sales during 2020. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for SCE's service area. Furthermore, as with the Project, during construction and operation, other future development projects would be expected to incorporate energy



conservation features and comply with applicable regulations including CALGreen and state energy standards under Title 24. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2018 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf per day in 2022.¹ Based on the Project's estimated natural gas consumption of 686,628 kBTU/yr the Project would account for less than 0.0001 percent of SoCalGas' anticipated annual consumption. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. Furthermore, future development projects would be expected to incorporate energy conservation features and comply with applicable regulations including CALGreen and state energy standards under Title 24. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a net total of 16,239 gallons of gasoline and 74,294 gallons of diesel fuel during construction. The Project's operation would result in an estimated fuel consumption 138,783 gallons of fuel per year. For comparison, the CEC Transportation Energy Demand Forecast estimates that between 12.3 billion to 12.7 billion gallons of gasoline and 3.7 billion to 4.7 billion gallons of diesel will be consumed in the year 2030. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Therefore, the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.

4.3.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less-than-Significant Impact. The amount of energy and fuel consumed by construction and operation of the Project would not be inefficient, wasteful, or unnecessary. Furthermore, the Project would not cause or result in the need for additional energy facilities or energy delivery systems. Accordingly, the Project's impacts associated with energy consumption would be less than significant.

¹ *California Gas and Electric Utilities. 2018. 2018 California Gas Report.*
https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf



Threshold b: Less-than-Significant Impact. The Project would not cause or result in the need for additional energy production or transmission facilities. The Project would not engage in the wasteful or inefficient uses of energy and the Project would not obstruct the achievement of energy conservation goals within the State of California. Thus, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

4.3.8 MITIGATION

Impacts would be less than significant and mitigation is not required.

4.3.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts are less than significant.



4.4 GEOLOGY AND SOILS

This Subsection assesses the existing surface and subsurface geologic conditions and features of the Project site, and determines the potential for impacts associated with these features. The analysis in this Subsection is based, in part, on information from the report titled “Geotechnical Engineering Report” by Terracon Consultants, Inc (“TCI”) dated November 19, 2019. (TCI, 2019) This report is included as Appendix A to the Initial Study, Appendix A of this EIR. Analysis for Threshold f of this Subsection is based on information from the report titled “Paleontological Assessment for the Commerce Logistics Center Project” by Brian F. Smith and Associates, Inc (“BFSA”) (BFSA, 2019b) dated December 13, 2019. This report is included as Appendix E to this EIR.

4.4.1 EXISTING CONDITIONS

A. Regional Geology

The Project site is located within the Central Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded by, and cut through by, several active fault systems within the Los Angeles metropolitan area.

The Project site is located within an area of California known to contain a number of active and potentially active faults. The Project site is approximately 2.36 miles (mi) from the buried plane of the Puente Hills Blind Thrust and 5.78 mi from the surface trace of the closest element of the Elsinore fault zone (TCI, 2019, p. 6). There are no known faults crossing the Project site and the site is not within a State of California Special Studies Zone.

B. Site Geological Units

The Project site includes two existing buildings with associated parking lots and driveways. Surface groundcover includes asphalt and concrete slabs at a depth approximately 3.0 to 3.5 inches (in) thick. Deeper subsurface material types encountered at the Project site during site exploration and testing included an additional concrete layer, approximately 6.5 to 7.0 in thick. Next, approximately 3 to 7.5 inches of base. Fill, classified as silty sand and sandy silt, light brown to dark brown, was discovered in depths greater than approximately 1.0 to 5.0 ft. bgs. At the maximum depths that boring samples were taken, ranging from 5.0 to 51.5 ft. bgs, silty sand, sandy silt, sandy silty clay was present with a consistency ranging from loose to very dense (TCI, 2019, p. 3).

C. Site Topography

The Project site consists of land with low topographic relief, with a slight east gradient. Overall elevations on-site range from approximately 145 to 150 feet above mean sea level (amsl).

D. Groundwater

Groundwater seepage was not observed within the maximum depths (51.5 ft.) of exploration during or at the completion of drilling. Based on TCI’s review of groundwater data in the region, depth to



groundwater is expected to be approximately 137 to 152 feet bgs. Accordingly, groundwater is not anticipated to affect construction at the Project site (TCI, 2019, pp. 3-4).

E. Faulting

The Project site is located within an area of California known to contain a number of active and potentially active faults. The Project site is approximately 2.36 mi from the buried plane of the Puente Hills Blind Thrust and 5.78 mi from the surface trace of the closest element of the Elsinore fault zone (TCI, 2019, p. 6). There are no known faults crossing the Project site and the site is not within a State of California Special Studies Zone (TCI, 2019, p. 7).

F. Paleontological Resources

The Project site is located within the Central Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded by, and cut through by, several active fault systems within the Los Angeles metropolitan area (BFSA, 2019b, p. 2). A paleontological records search was conducted to determine the Project's potential to directly or indirectly destroy a paleontological resource located underneath the Project site. The report concluded that it is unlikely that significant paleontological resources are present in the near-surface young Quaternary alluvium, but there is a high potential for vertebrate fossils to be located within the older Quaternary alluvial deposits, below the young alluvial deposits (BFSA, 2019b, p. 4).

4.4.2 REGULATORY FRAMEWORK

The following is a brief description of the federal, state, and local environmental laws and related regulations governing issues related to paleontological resources.

A. State Regulations

1. California Environmental Quality Act

Under Guidelines for the Implementation of CEQA, as amended March 29, 1999 (Title 1, Chapter 3, California Code of Regulations: 15000 et seq.), procedures define the type of activities, persons, and public agencies required to comply with CEQA. In the Environmental Checklist, one of the questions to answer is, "Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" (Section 15023, Appendix G, Section XIV, Part a). The California Public Resources Code (PRC) Section 5097.5 states:

- a) No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.



- b) As used in this section, “public lands” means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

4.4.3 METHODOLOGY

To evaluate potential impacts to paleontological resources, BFSa prepared a Paleontological Assessment, Appendix E. The assessment relies on a paleontological records search performed by Dr. Sam McLeod of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and assess soils underlying the Project site to determine its potential to encounter fossils during excavation activities.

4.4.4 BASIS FOR DETERMINING SIGNIFICANCE

Section VI of Appendix G to the CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate the Project’s impacts resulting from geologic or soil conditions (AEP, 2019):

- a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - o *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.*
 - o *Strong seismic ground shaking?*
 - o *Seismic-related ground failure, including liquefaction?*
 - o *Landslides?*
- b. *Result in substantial soil erosion or the loss of topsoil?*
- c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*
- e. *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*
- f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

As detailed in the Initial Study prepared for the Project (Appendix A), Project impacts related to faulting, earthquakes, liquefaction, landslides, soil erosion, unstable soils, expansive soils, and use of septic tanks would have less than significant or no impacts. Therefore, Thresholds a) – e) will not be addressed further in the analysis below.



4.4.5 IMPACT ANALYSIS

Threshold f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site is located within the Central Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded by, and cut through by, several active fault systems within the Los Angeles metropolitan area (BFSA, 2019b, p. 2). A paleontological records search was prepared to determine the Projects potential to directly or indirectly destroy a paleontological resource located underneath the Project site. Soils underlying the site consist of young Quaternary alluvium and older Quaternary alluvial deposits. It is unlikely that significant paleontological resources are present in the near-surface young Quaternary alluvium. However, there is a high potential for vertebrate fossils to be located within older Quaternary alluvial deposits, below the young alluvial deposits (BFSA, 2019b, p. 4). Therefore grading, excavation, or utility trenching activities at the Project, starting at five feet below the surface have the potential to encounter paleontological resources and result in potentially significant impacts.

4.4.6 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site that have a potential for uncovering paleontological resources. Generally, impacts relating to paleontological resources are site-specific and addressed on a site-by-site basis. Therefore, while there is a potential for an impact on a specific site, the impact would not ordinarily extend beyond the site or immediately surrounding area. There could be circumstances in which a paleontological resource extends over more than one property, however, there are no adjacent related projects that could potentially result in affects to unknown paleontological resources that may lie in the subsurface of the project site; therefore, there would be no cumulative impacts would occur.

4.4.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold f: Significant Impact. Although no paleontological resources are known to occur within the Project's impact limits, grading activities within older Quaternary alluvial deposits has the potential to uncover paleontological resources.



4.4.8 MITIGATION

- MM 4.4-1 Prior to issuance of a grading permit, the project applicant shall retain a paleontologist to monitor grading activities 5 feet below the surface. Periodic spot checks should be performed from five feet below the surface to a depth of eight feet, to determine the presence of Pleistocene strata or fossils. Once Pleistocene strata are recognized or fossils are discovered, or excavation depths proceed beyond eight feet deep, full-time monitoring for paleontological resources is required.
- MM 4.4-2 Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.
- MM 4.4-3 Recovered specimens shall be prepared to a point of identification and permanent preservation, including screen-washing sediments to recover small invertebrates and vertebrates if indicated by the results of test sampling. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the developer.
- MM 4.4-4 Prior to the issuance of an occupancy permit, the Project applicant shall submit a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the City of Commerce, will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.

4.4.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Less than significant.



4.5 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based in part on a report prepared by Urban Crossroads, Inc. titled “5200 Sheila Street Greenhouse Gas Analysis,” dated October 6, 2020 and included as Appendix B3 to this EIR (Urban Crossroads, 2020c). The technical report and analysis in this Subsection assess the proposed Project’s potential to generate greenhouse gas (GHG) emissions that could contribute to global climate change and its associated environmental effects.

4.5.1 Existing Conditions

A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth’s atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2020c, p. 8)

An individual project like the proposed Project cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, Section 3.0 will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect. (Urban Crossroads, 2020c, p. 8)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂, N₂O, CH₄, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth’s atmosphere, but prevent radioactive heat from escaping, thus warming the earth’s atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2020c, p. 8)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth’s average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth’s atmosphere is considered to be the cause for the observed increase in the earth’s temperature. (Urban Crossroads, 2020c, p. 8)



B. Greenhouse Gasses

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (Urban Crossroads, 2020c, pp. 8-9)

GHGs have varying Global Warming Potential (GWP) values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO₂ is utilized as the reference gas for GWP, and thus has a GWP of 1. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.5-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in the table below, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO₂ to 23,900 for Sulfur Hexafluoride (SF₆) and GWP for the IPCC's 5th Assessment Report range from 1 for CO₂ to 23,500 for SF₆.

Table 4.5-1 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		Second Assessment Report	5 th Assessment Report
CO ₂	See*	1	1
CH ₄	12.4	21	28
N ₂ O	121	310	265
HFC-23**	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF ₆	3,200	23,900	23,500

*As per Appendix 8.A of IPCC's 5th Assessment Report, no single lifetime can be given

** Hydrofluorocarbons (HFCs)

Source: (Urban Crossroads, 2020c, Table 2-2)

Provided below is a description of the common gases that contribute to GCC. For more information about these gases and their associated human health effects, refer to Section 2.3 of Appendix B3 to this EIR and the reference sources cited therein.

- Water Vapor (H₂O) is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer,



the relative humidity can be higher (in essence, the air is able to ‘hold’ more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a “positive feedback loop.” The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation, thereby allowing less energy to reach the Earth’s surface and heat it up. There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent. (Urban Crossroads, 2020c, pp. 9-10)

- Carbon Dioxide (CO₂) is an odorless and colorless GHG that is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Manmade sources include: the burning of coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases CO₂ emissions has increased dramatically. As an example, prior to the industrial revolution, CO₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Exposure to CO₂ in high concentrations can cause human health effects, but outdoor levels are not high enough to adversely affect human health. (Urban Crossroads, 2020c, p. 10)
- Methane (CH₄) is an extremely effective absorber of radiation, though its atmospheric concentration is less than CO₂ and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs. Methane has both natural and manmade sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other manmade sources include fossil-fuel combustion and biomass burning. No human health effects are known to occur from atmospheric exposure to methane; however, methane is an asphyxiant that may displace oxygen in enclosed spaces. (Urban Crossroads, 2020c, p. 11)
- Nitrous Oxide (N₂O) concentrations began to rise in the atmosphere at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N₂O is used as an aerosol spray propellant, (e.g., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines



and in race cars. N₂O can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction. N₂O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause brain damage. (Urban Crossroads, 2020c, pp. 11-12)

- Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH₄ or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were first synthesized in 1928 and have no natural source. CFCs were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, due to their long atmospheric lifetime, some of the CFCs will remain in the atmosphere for over 100 years. (Urban Crossroads, 2020c, p. 12)
- Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order largest to smallest), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂). Prior to 1990, the only significant emissions were HFC-23 emissions. HFC-134a emissions are increasing due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt. No human health effects are known to result from exposure to HFCs, which are manmade and used for applications such as automobile air conditioners and refrigerants. (Urban Crossroads, 2020c, p. 13)
- Perfluorocarbons (PFCs) are primarily produced for aluminum production and semiconductor manufacture. PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The U.S. EPA estimates that concentrations of CF₄ in the atmosphere are over 70 ppt. No human health effects are known to result from exposure to PFCs. (Urban Crossroads, 2020c, p. 13)
- Sulfur Hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (22,800). The U.S. Environmental Protection Agency (EPA) indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. (Urban Crossroads, 2020c, p. 13)



- Nitrogen Trifluoride (NF₃) is a colorless gas with a distinctly moldy odor. The World Resources Institute indicates that NF₃ has a 100-year GWP of 17,200. NF₃ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis. (Urban Crossroads, 2020c, p. 14)

C. Greenhouse Gas Emissions Inventories

☐ **Global**

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2017. Based on the latest available data, the sum of these emissions totaled approximately 29,216,501 gigagram (Gg) CO₂e, as shown in Table 4.5-2, *Top GHG-Producing Countries and the European Union*.

Table 4.5-2 Top GHG-Producing Countries and the European Union

Emitting Countries	GHG Emissions (Gg CO₂e)
China	11,911,710
United States	6,456,718
European Union (28-member countries)	4,323,163
India	3,079,810
Russian Federation	2,155,470
Japan	1,289,630
Total	29,216,501

Source: (Urban Crossroads, 2020c, Table 2-3)

☐ **United States**

As noted in Table 4.5-2, the United States, as a single country, was the number two producer of GHG emissions in 2017.

☐ **State of California**

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls, but is still a substantial contributor to the United States (U.S.) emissions inventory total. The CARB compiles GHG inventories for the State of California. Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 million metric tons of CO₂e per year (MMTCO₂e/yr). (Urban Crossroads, 2020c, p. 16)

☐ **Project Site**

Under existing conditions, the Project site is developed with a 112,953-sf office building. For a complete assessment of the existing emissions generated at the Project site, see Subsection 4.1.1 of this



EIR. Table 4.5-3, *Existing Project Site GHG Emissions*, shows the estimated GHG emissions from the existing development. Detailed operation model outputs are present in Appendices 3.2 and 3.3 of Appendix B3 of this EIR.

Table 4.5-3 Existing Project Site GHG Emissions

Emissions Source	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Area Source	0.00	0.00	0.00	0.00
Energy Source	145.60	0.00	0.00	146.14
Mobile Source (Passenger Car)	642.16	0.02	0.00	642.56
Mobile Source (Truck)	184.42	0.00	0.00	184.46
On-Site Equipment	50.79	0.02	0.00	51.20
Waste	21.55	1.27	0.00	53.39
Water Usage	116.65	0.86	0.02	114.31
Total CO₂e (All Sources)	1,222.06			

D. Effects of Climate Change in California

Climate change impacts in California have the potential to include, but are not limited to, the following areas:

☐ **Public Health**

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (Urban Crossroads, 2020c, p. 16)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90F in Los Angeles and 95F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (Urban Crossroads, 2020c, p. 17)

☐ **Water Resources**

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising



temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply. (Urban Crossroads, 2020c, p. 17)

☐ Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (Urban Crossroads, 2020c, pp. 17-18)



☐ **Forests and Landscapes**

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC. (Urban Crossroads, 2020c, p. 18)

☐ **Rising Sea Levels**

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches. (Urban Crossroads, 2020c, p. 18)

4.5.2 Regulatory Framework

Below is an account of the regulatory programs, policies, laws, and regulations that are applicable to GHG emissions and GCC in California. For more information, refer to Section 2.7 of Appendix B3 of this EIR and the reference sources cited therein.

A. International and Federal Regulations

☐ ***International Regulation and the Kyoto Protocol***

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail GCC. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling GHG emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Notably, while the United States is a signatory to the Kyoto Protocol,



Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto. (Urban Crossroads, 2020c, pp. 18-19)

☐ ***United Nation's Framework Convention on Climate Change***

On December 12, 2015, 195 nations – including the United States and China – agreed upon a strategy for combatting GCC. The meeting, known as the 21st Annual Conference of Parties (COP21), established a framework for reducing GHG emissions, to go in effect in 2020. In mitigating global climate change, COP 21 participating nations agreed upon a universal, long-term goal of keeping the global temperature to less than 3.6°F above pre-industrial levels. In addition to that, nations agreed to minimize their GHG emissions as soon as possible, with the recognition that developing countries may take longer to reach this goal than developed countries. Thereafter, nations are to undergo rapid reductions in accordance to best available technological advances. Nations are to submit national climate action plans that detail future objectives to address climate change. (Urban Crossroads, 2020c, p. 18)

On November 4, 2019, the Trump administration formally notified the U.N. that the United States would withdraw from the Paris Agreement. It should be noted that withdrawal would be effective one year after notification in 2020. (Urban Crossroads, 2020c, p. 19)

☐ ***Federal Regulation and the Clean Air Act***

Prior to the last decade, there have been no concrete federal regulations of GHGs or major planning for climate change adaptation. The following are actions regarding the federal government, GHGs, and fuel efficiency.

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (U.S. Court) found that four GHGs, including CO₂, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.



These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section “Clean Vehicles” in Appendix B3 of this EIR. (Urban Crossroads, 2020c, pp. 20-21)

☐ Mandatory Reporting of GHGs

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the EPA. (Urban Crossroads, 2020c, p. 22)

B. State Regulations

☐ California Assembly Bill No. 32 (AB 32)

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32 include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. The CARB is the state agency charged with monitoring and regulating sources of GHGs. AB 32 states the following: (Urban Crossroads, 2020c, p. 25)

“Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.”

☐ California Senate Bill No. 32 (SB 32)

On September 8, 2016, Governor Jerry Brown signed the SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature. (Urban Crossroads, 2020c, p. 25)



☐ California Air Resources Board (CARB) Scoping Plan Update

In November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The *Final 2017 Scoping Plan Update* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH₄ emissions from agricultural and other wastes.

The *Final 2017 Scoping Plan Update* establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. (Urban Crossroads, 2020c, pp. 25-27)

☐ Cap-and-Trade Program

The Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of achieving a 40% reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16% between 2013 and 2020, and by an additional 40% by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 MTCO_{2e}/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 MTCO_{2e}/yr "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").



Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender “compliance instruments” for each MTCO_{2e} of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year’s compliance obligation by November of each year.

The Cap-and-Trade Program provides a firm cap, which provides the highest certainty of achieving the 2030 target. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis.

The Cap-and-Trade Program covered approximately 80% of California’s GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. (Urban Crossroads, 2020c, pp. 27-28)

□ *The Sustainable Communities and Climate Protection Act of 2008 (SB 375)*

Passing the Senate on August 30, 2008, SB 375 was signed by the Governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, “Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.” SB 375 does the following: it (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies. Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project: (Urban Crossroads, 2020c, p. 28)

1. Is in an area with an approved sustainable communities strategy or an alternative planning strategy that the CARB accepts as achieving the GHG emission reduction targets.
2. Is consistent with that strategy (in designation, density, building intensity, and applicable policies).



3. Incorporates the mitigation measures required by an applicable prior environmental document.

☐ ***California Assembly Bill No. 1493 (AB 1943)***

California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phase in during the 2009 through 2016 model years. When fully phased in, the near-term (2009–2012) standards will result in about a 22% reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards will result in about a 30% reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid EVs (EV) and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California. (Urban Crossroads, 2020c, pp. 28-29)

☐ ***California Senate Bill No. 350 (SB 350)***

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (Urban Crossroads, 2020c, p. 29)

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.



- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

☐ *Executive Order B-55-18 and Senate Bill No. 100 (SB 100)*

Executive Order B-55-18 and SB 100. SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal. (Urban Crossroads, 2020c, p. 30)

☐ *Executive Order S-3-05*

Former California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector. (Urban Crossroads, 2020c, p. 30)



☐ *Executive Order S-01-07 (LCFS)*

The Governor signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. The CARB adopted the LCFS on April 23, 2009.

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court's ruling issued on December 29, 2011, included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit Court's decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act (APA) when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court's judgment and directed issuance of a writ of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce GHG emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

To address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify and streamline program operations, and enhance enforcement. On November 16, 2015 the Office of Administrative Law approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, the CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (Urban Crossroads, 2020c, pp. 30-31)

☐ *Executive Order S-13-08*

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy (CNRA 2009) was adopted, which is the "...first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research. (Urban Crossroads, 2020c, p. 31)



☐ ***Executive Order B-30-15***

On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligns California's GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of MMTCO₂e. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable for local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature. (Urban Crossroads, 2020c, pp. 31-32)

☐ ***California Title 20 Standards***

CCR, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment. (Urban Crossroads, 2020c, p. 32)

☐ ***California Title 24 Standards***

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020.

The CEC indicates that the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, update indoor and outdoor lighting for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades.



CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission (BSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that have become effective on January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance provided, they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official. 2019 CALGreen standards which are applicable to the Project are located in subsection Title 24 CCR of Appendix B3 of this EIR. (Urban Crossroads, 2020c, pp. 32-34)

☐ CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 lbs of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions. (Urban Crossroads, 2020c, pp. 34-35)

☐ California Title 24 Standards

The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices. (Urban Crossroads, 2020c, pp. 23-24)

☐ Phase 1 and 2 Heavy-Duty Vehicle GHG Standards

CARB has adopted a new regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule



for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer Greenhouse Gas Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. In September 2011, the EPA adopted their new rule for HDTs and engines. The EPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements begin with model year (MY) 2014 with stringency levels increasing through MY 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year HDT vehicles, including trailers. But as discussed above, the EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued. (Urban Crossroads, 2020c, p. 35)

☐ Senate Bill No. 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states “(a) On or before July 1, 2009, the OPR shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a).” Section 21097 was also added to the Public Resources Code. It provided CEQA protection until January 1, 2010 for transportation projects funded by the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 or projects funded by the Disaster Preparedness and Flood Prevention Bond Act of 2006, in stating that the failure to analyze adequately the effects of GHGs would not violate CEQA.

On December 28, 2018, the Natural Resources Agency announced the Office of Administrative Law approved the amendments to the CEQA Guidelines for implementing the CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing CEQA Guidelines to reference climate change.

Section 15064.3 was added the CEQA Guidelines and states that in determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency’s analysis should consider a



timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use. (Urban Crossroads, 2020c, pp. 35-36)

☐ South Coast Air Quality Management District

The South Coast Air Quality Management District (South Coast AQMD) is the agency responsible for air quality planning and regulation in the SCAB. The South Coast AQMD addresses the impacts to climate change of projects subject to South Coast AQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The South Coast AQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, South Coast AQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the South Coast AQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The South Coast AQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of a five-tiered approach which are discussed in subsection SCAQMD of Appendix B3 of this EIR.

The South Coast AQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate. South Coast AQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject to South Coast AQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable South Coast AQMD regulations. (Urban Crossroads, 2020c, pp. 36-38)

4.5.3 Methodology

On October 17, 2017, the South Coast AQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod) version 2016.3.2. The purpose of this model is



to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.3 of Appendix B3 of this EIR. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water.

On August 19, 2019, the EPA approved the 2017 version of the Emissions FAcTtor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, vehicle miles traveled (VMT) from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EIR Appendix B3 utilizes annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities.

Because the EMFAC2017 emission rates are associated with vehicle fuel types while CalEEMod vehicle emission factors are aggregated to include all fuel types for each individual vehicle class, the EMFAC2017 emission rates for different fuel types of a vehicle class are averaged by activity or by population and activity to derive CalEEMod emission factors.

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the project development, infrastructure and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the South Coast AQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood or documented, and would be challenging to mitigate. Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, South Coast AQMD has not recommended, and is not requiring, life-cycle emissions analysis. (Urban Crossroads, 2020c, pp. 41-42)

A. Project Construction Emissions

Construction is expected to commence in February 2021 and will last through July 2022. The construction schedule utilized in the analysis, shown in Table 4.5-4, *Construction Duration*, represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per



CEQA Guidelines. The duration of construction activity was based on information provided by the Project Applicant, CalEEMod defaults, and the 2022 opening year.

Table 4.5-4 Construction Duration

Phase Name	Start Date	End Date	Days
Demolition	02/01/2021	06/04/2021	90
Site Preparation	06/05/2021	06/18/2021	10
Grading	06/19/2021	07/16/2021	20
Building Construction	07/17/2021	06/03/2022	230
Paving	06/04/2022	07/01/2022	20
Architectural Coating	07/02/2022	07/29/2022	20

Source: (Urban Crossroads, 2020c, Table 3-1)

☐ **Construction Equipment**

Site specific construction fleet may vary due to specific project needs at the time of construction. The associated construction equipment was generally based on CalEEMod defaults, and the Project applicant has confirmed that the equipment list is reasonable for the Project's construction. A detailed summary of construction equipment assumptions by phase is provided at Table 4.5-5, *Construction Equipment*. For detailed modeling inputs/outputs, refer to Appendix 3.1 of Appendix B3 of this EIR.



Table 4.5-5 Construction Equipment

Phase Name	Equipment Name	Quantity	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	3	8
	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozer	1	8
Building Construction	Crawler Tractors	1	8
	Cranes	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2020c, Table 3-2 and Table 3-3)

Construction Emissions Summary

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the South Coast AQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.5-6, *Amortized Annual Construction Emissions*.

Table 4.5-6 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
2020	586.40	0.13	0.00	589.69
2021	339.77	0.07	0.00	341.45
Total Annual Construction Emissions	926.17	0.20	0.00	931.13
Amortized Construction Emissions (MTCO ₂ e)	30.87	0.01	0.00	31.04

Source: (Urban Crossroads, 2020c, Table 3-3)

B. Project Operation Emissions

Operational activities associated with the proposed Project will result in emissions of CO₂, CH₄, and N₂O from the following primary sources: Area Source Emissions; Energy Source Emissions; Mobile



Source Emissions; On-site Equipment Emissions; Water Supply, Treatment, and Distribution; and Solid Waste.

☐ **Area Source Emissions**

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2020c, p. 45)

☐ **Energy Source Emissions**

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting¹. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod default parameters were used. (Urban Crossroads, 2020c, p. 45) California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The CEC anticipates that nonresidential buildings (such as the proposed Project) will use approximately 30% less energy due to lighting upgrade requirements. The CalEEMod defaults for Title 24 – Electricity, Title 24 – Natural Gas, and Lighting Energy was reduced by 30% in order to reflect consistency with the 2019 Title 24 standards. (Urban Crossroads, 2020c, p. 45)

☐ **Mobile Source Emissions**

The Project-related operational air quality impacts are derived primarily from vehicle trips generated by the Project. Trip characteristics available from the *Traffic Assessment*, discussed in EIR Subsection 4.7 and included as Appendix I1, were utilized in this analysis.

The first run analyzed passenger car emissions, incorporated the CalEEMod default trip length of 16.6 miles for passenger cars and an assumption of 100% primary trips.

It is important to note that although the Traffic Assessment does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks

¹ The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.



(LDT1 & LDT2), and Medium-Duty-Vehicles (MDV) vehicle types. Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than 3,750 pounds. Vehicles under the LDT2 category have a GVWR of less than 7,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs. In order to account for emissions generated by passenger cars, the fleet mix presented in Table 4.5-7, *Passenger Car Fleet Mix*, was utilized in this analysis.

Table 4.5-7 Passenger Car Fleet Mix

Land Use	Vehicle Type	%
General Light Industrial/Warehouse	LDA	59.67
	LDT1	4.91
	LDT2	22.28
	MDV	13.14

Source: (Urban Crossroads, 2020c, Table 3-4)

The second run analyzed truck emissions, incorporated the South Coast AQMD recommended truck trip length of 40 miles and an assumption of 100% primary trips.

In order to be consistent with the Traffic Assessment, trucks are broken down by truck type. The trucks are comprised of 2-axle/Light-Heavy-Duty Trucks (LHDT), 3-axle/Medium-Heavy-Duty Trucks (MHDT), and 4+-axle/Heavy-Heavy-Duty Trucks (HHDT). In order to account for emissions generated by trucks, the fleet mix presented in Table 4.5-8, *Truck Fleet Mix*, was utilized in this analysis.

Table 4.5-8 Truck Fleet Mix

Land Use	Vehicle Type	%
General Light Industrial	LHDT	20.00
	MHDT	20.00
	HHDT	60.00
Warehouse	LHDT	17.65
	MHDT	23.53
	HHDT	58.82

Source: (Urban Crossroads, 2020c, Table 3-5)

☐ **On-site Equipment Emissions**

It is common for industrial warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo handling equipment is the yard truck which is designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors (UTRs), hustlers, yard hostlers, and yard tractors. The cargo handling equipment is assumed to have a horsepower (hp) range of approximately 175 hp to 200 hp. Based on the latest available information from South Coast AQMD; for example, high-cube warehouse projects typically have 3.6-yard trucks per million sf of building space. For this particular Project, based on the maximum square footage of



each building space, on-site modeled operational equipment includes up to one (1) 200 hp, compressed natural gas or gasoline-powered yard tractors operating at 4 hours a day for 365 days of the year. (Urban Crossroads, 2020c, p. 47)

☐ *Water Supply, Treatment, and Distribution*

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. CalEEMod default parameters were used to estimate GHG emissions associated with water supply, treatment and distribution for the Project scenario. (Urban Crossroads, 2020c, p. 47)

☐ *Solid Waste*

Industrial land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2020c, p. 47)

4.5.4 Basis for Determining Significance

In order to assess the significance of the Project's environmental impacts, it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. As discussed in Subsection 4.5.1 above, while Project-related GHG emissions can be estimated, the direct impacts of such emissions on GCC is *de minimis* considering the worldwide scope of climate change. There is no evidence at this time that would indicate that the small quantity of emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that “[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.” Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project has no potential to result in a direct impact to GCC; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively considerable way.

The CEQA Guidelines indicate that a project would result in a significant impact on climate change if a project were to:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or*



- b) *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

The City of Commerce does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The South Coast AQMD's adopted numerical threshold of 10,000 MTCO₂e per year for industrial stationary source emissions is selected as the significance criterion. The South Coast AQMD-adopted industrial threshold was selected by the City because the proposed Project is analogous to an industrial use much more closely than any other land use such as commercial or residential in terms of its expected operating characteristics. The Project proposes a single warehouse building, characteristic of an industrial operation. Further, analysis of the Project's traffic generation is based on the ITE Trip Generation Manual, 10th Edition, 2017 for industrial and warehouse uses. Also, 10,000 MTCO₂e has been used as the significance threshold by many local government lead agencies for logistics projects throughout the SCAG region since the South Coast AQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the South Coast AQMD uses their adopted 10,000 MTCO₂e threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 MT CO₂e threshold used in this analysis is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other. (Urban Crossroads, 2020c, p. 49)

4.5.5 Impact Analysis

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

As discussed above, the Project would have the potential to generate greenhouse gas emissions during demolition, construction, and operation. The annual GHG emissions associated with the operation of the proposed Project are estimated as summarized in Table 4.5-9, *Project GHG Emissions*.



Table 4.5-9 Project GHG Emissions

Emission Source	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	30.87	0.01	0.00	31.04
Area Source	7.84E-03	2.00E-05	0.00	8.36E-03
Energy Source	249.90	9.51E-03	2.49E-03	250.88
Mobile Source (Passenger Car)	483.32	0.01	0.00	483.62
Mobile Source (Truck)	780.87	0.03	0.00	781.65
On-Site Equipment	50.79	0.02	0.00	51.20
Waste	24.72	1.46	0.00	61.25
Water Usage	118.67	0.87	0.02	146.80
Total CO ₂ e	1,806.45			

Source: (Urban Crossroads, 2020c, Table 3-7)

As shown, the Project will result in approximately 1,806.45 MT CO₂e/yr; the proposed Project would not exceed the South Coast AQMD/City's screening threshold of 10,000 MT CO₂e per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

Threshold b: *Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

As previously stated, pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with AB 32, and SB 32 are discussed below. It should be noted at the Project's consistency with the 2008 Scoping Plan is not necessary, since the target year for the 2008 Scoping Plan was 2020 (these targets have been met), and the Project's buildout year is 2022. As such the 2008 Scoping Plan does not apply and consistency with the 2017 Scoping Plan is relevant and discussed as follows.

B. SB 32/2017 Scoping Plan Consistency

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 4.5-10, *2017 Scoping Plan Consistency Summary*, summarizes the Project's consistency with the 2017 Scoping Plan. As summarized, the Project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.



Table 4.5-10 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The Project would be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption. The Project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. The proposed Project would be designed and constructed to implement the energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The proposed Project includes energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets.
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB



Action	Responsible Parties	Consistency
	Transportation (Caltrans), CEC, OPR, Local Agencies	zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile		Consistent. This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.



Action	Responsible Parties	Consistency
Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”		
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor’s Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low- GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of		Consistent. The Project would not obstruct or interfere with agency



Action	Responsible Parties	Consistency
zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	Consistent. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Consistent. The Project would implement waste reduction and recycling measures consistent with State and City requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLCP and SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Consistent. The Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.



Action	Responsible Parties	Consistency
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		Consistent. The Project site is developed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		Consistent. Where appropriate, Project designs will incorporate wood or wood products. The Project would not obstruct or interfere agency efforts to encourage use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan.		Consistent. The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Consistent. The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan.	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Consistent. The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Consistent. The Project would not obstruct or interfere agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

Source: (Urban Crossroads, 2020c, Table 3-8)

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that



the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030. (Urban Crossroads, 2020c, p. 50)

4.5.6 Cumulative Impact Analysis

GCC occurs as the result of global emissions of GHGs. An individual project such as the proposed Project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines § 15130[f]).

Accordingly, the Project-specific impact analysis provided above reflects a cumulative impact analysis of the Project's GHG emissions, and concludes that the Project would not conflict with an applicable GHG-reduction plans, policies, or regulations but would generate cumulatively considerable GHG emissions that may have a significant impact on the environment because the Project would exceed the South Coast AQMD's GHG emissions threshold of 10,000 MTCO_{2e} per year.

4.5.7 Significance of Impacts Before Mitigation

Threshold a): Less-than-Significant Impact. The Project will result in approximately 1,806.45 MT CO_{2e}/yr; the proposed Project would not exceed the South Coast AQMD/City's screening threshold of 10,000 MT CO_{2e} per year. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

Threshold b): Less-than-Significant Impact. The Project would not conflict with the 2017 Scoping Plan Update, nor any other applicable plan, policy, or regulation of an agency adopted for the purposes of reducing the emissions of GHGs. Accordingly, the Project would have a less than significant impact and no mitigation or further analysis is required.

4.5.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.5.9 Significance after Mitigation

Impacts would be less than significant; therefore, mitigation is not required.



4.6 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this Subsection is based in part on a technical study that was prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. The report titled “*Phase I Environmental Site Assessment*” (referenced herein, “EMG, 2018”) prepared by EMG (dated 10/10/2018) and appended to this EIR as Appendix F. The Project-specific Environmental Site Assessment (ESA) was performed in accordance with methods and procedures consistent with the American Society of Testing and Materials (ASTM) Standard Practice E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*.

The term “hazardous material” is defined in different ways by different regulatory programs. For purposes of this environmental document, the definition of “hazardous material” is the same as that outlined in the California Health and Safety Code, Section 25501:

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

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

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

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

4.6.1 Existing Conditions

A. Historical Review, Archival Review, Regulatory Records Review, and Field Reconnaissance

As part of the Phase I ESA (EIR Appendix F), EMG assessed the conditions on the 5.65-acre Project site and surrounding properties to determine the previous uses of the Project and surrounding area in order to identify the likelihood of past uses having led to a recognized environmental condition (RECs), historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), significant data gaps, or significant business risks in connection with the Project site. A REC is the presence or likely presence of any hazardous substances or petroleum products on



the Project site; an HREC is a past release that has been remediated to below “residential” standards and given regulatory closure with no use restrictions; and CRECs include residual hazardous substances allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

☐ *Historical Review*

Based on a review of aerial photographs, fire insurance maps, United States Geological Services (USGS) topographic maps, local street directories, and field reconnaissance, the Project site’s first known use was agricultural until the 1930s, prior to being developed with general commercial buildings in the 1940s. The Project was developed with numerous offices and laboratories occupied by the Fluor Corporation (1940s – 1960). The Project site was redeveloped with the existing cafeteria building and food warehouse in 1957 and 1965, respectively. From the 1950s through the 1990s there were additional buildings on the northern portion of the Project site. The Project site has been occupied by Unified Western Grocers since 1989, and the two Project site buildings were substantially renovated in 1999. No evidence of historic dry cleaners was identified, nor was evidence of petroleum exploration or production identified. (EMG, 2018, pp. 28-29)

☐ *Regulatory Database Review*

A review of the regulatory database report provided by Environmental Risk Information Services in accordance with ASTM E1527-13 was conducted to determine if the Project is a listed regulatory site. The regulatory database report is included in Appendix H of the EMG, appended to this EIR as Appendix F. The Project site is listed on the following databases: Facility Index System (FINDS), Integrated Compliance Information System (ICIS), EMISSIONS, RCRA Generators, Historical Hazardous Waste Manifest, Historical Hazardous Substance Storage (HHSS), and Los Angeles County Department of Public Works Hazardous Materials System (HMS). As indicated in Table 4.6-1, *Project Site Database Listings*, the information provided in these databases were not indicative of a REC and no further action or investigation is needed. (EMG, 2018, p. 31) Furthermore, as indicated in Table 4.6-2, *Off Site Database Listings*, off-site regulatory database listings which could have a reasonable potential to impact the Project were assessed and were found unlikely to affect the Project site. (EMG, 2018, p. 39)



Table 4.6-1 Project Site Database Listings

Database	Purpose	Facility On-Site	Finding
FINDS	The FINDS database cross-references various federal and state database listings and does not, in and of itself, typically contain environmentally significant information.	Unified Western Grocers	The information provided is not indicative of a REC and no further action or investigation is recommended.
		Supervalu	
ICIS	The ICIS supports the information needs of the national enforcement and compliance program as well as the unique needs of the NPDES program.	Unified Western Grocers	No other pertinent information was provided in this regulatory database listing. The information provided is not indicative of a REC and no further action or investigation is recommended.
EMISIONS	EMISIONS is a list of criteria and toxic pollutant emissions data for facilities in California made available by the California Environmental Protection Agency - Air Resources Board (ARB). Risk data may be based on previous inventory submittals. The toxics data are submitted to the ARB by the local air districts as requirement of the Air Toxics "Hot Spots" Program. This program requires emission inventory updates every four years.	Certified Grocers	No other pertinent information was provided in this regulatory database listing. The information provided is not indicative of a REC and no further action or investigation is recommended.
RCRA Generators	The RCRA Generators database is a listing of facilities that generate, transport, store, treat and/or dispose of hazardous waste and does not necessarily indicate that a release to the environment has occurred.	Unified Western Grocers	No further pertinent information was provided in this regulatory database listing. The information provided in this database is not indicative of a REC and no further action or investigation is recommended.
Historical Hazardous Waste Manifest	The Historical Hazardous Waste Manifest database is a list of historic hazardous waste manifests received by the Department of Toxic Substances Control (DTSC) from year the 1980 to 1992.	1X Santa Fe Land Improvement Company	Field observations determined this is not indicative of a REC and no further action or investigation is recommended.



Database	Purpose	Facility On-Site	Finding
HAZNET	The Manifest database includes information related to the transport of hazardous wastes by licensed hazardous waste disposal contractors and does not necessarily indicate that a release to the environment has occurred.	Atchinson, Topeka & Santa Fe Railroad	Additional review of regulatory records is not recommended as these records are not reasonably ascertainable or anticipated to contain useful information. The information provided in this database is not indicative of a REC and no further action or investigation is recommended.
		1X Santa Fe Land Improvement Company	
		1X Santa Fe Pacific Realty Company	
HHSS	The HHSS database contains information collected in the 1980s from facilities that stored hazardous substances. The information was originally collected on paper forms, was later transferred to microfiche, and recently indexed as a searchable database. When using this database, please be aware that it is based upon self-reported information submitted by facilities which has not been independently verified. It is unlikely that every facility responded to the survey and the database should not be expected to be a complete inventory of all facilities that were operating at that time. This database is maintained by the California State Water Resources Control Board's (SWRCB) Geotracker.	5200 Sheila Street	No further pertinent information was provided in this regulatory database listing. The information provided is not indicative of a REC and no further action or investigation is recommended.
		1X Santa Fe Land Improvement Company	
LA HMS	The LA HMS database is a list of sites that have or have had permits for industrial waste, underground storage tanks, or stormwater disposal.	Unified Western Grocers	No further pertinent information was provided in this regulatory database listing.
		Supervalu	
		Santa Fe Realty	



Database	Purpose	Facility On-Site	Finding
HIST TANK	The State Water Resources Control Board maintained the Hazardous Substance Storage Containers listing and inventory in the 1980s. This facility summary lists historic tank sites where the following container types were present: farm motor vehicle fuel tanks; waste tanks; sumps; pits, ponds, lagoons, and others; and all other product tanks. This set, published in May 1988, lists facility and owner information, as well as the number of containers. This data is historic and will not be updated.	Santa Fe Land Improvement Company	No other pertinent information was provided in this regulatory database listing.
PRP	Early in the cleanup process, the Environmental Protection Agency (EPA) conducts a search to find the potentially responsible parties (PRPs). EPA looks for evidence to determine liability by matching wastes found at the site with parties that may have contributed wastes to the site.	Certified Grocers	No other pertinent information was provided in this regulatory database listing. The information provided is not indicative of a REC and no further action or investigation is recommended.

Table 4.6-2 Off Site Database Listings

Off-Site Facility/Address	Databases	Finding
California Water Service Co. (5243 Sheila Street East)	<ul style="list-style-type: none"> • LUST • AST • CERS TANK • FINDS/FRS • HIST MANIFEST • LA HMS, HAZNET 	This facility is unlikely to have impacted the Project site and therefore does not represent a REC.
So Cal Gas, Fluor Western, Inc., 1X 2500 South Atlantic Blvd Associates, Classic Distributing & Beverage GRP Inc., San Francisco Federal Savings & Loan, Fluor Corporation Disposal Site (2500 South Atlantic Boulevard)	<ul style="list-style-type: none"> • FINDS, • Historical Manifest • Historical MLTS • LA-HMS • HAZNET • LA-SWF 	These facilities are unlikely to have impacted the Project site and therefore do not represent a REC.



Commerce Petrofuel, LLC, and Southland Fereal Enterprise (2445 Ralph Lieberman Avenue)	<ul style="list-style-type: none">• DELISTED TNK,• CERS TANK,• FINDS/FRS,• LA HMS,• LUST	These facilities are unlikely to have impacted the Project site and therefore do not represent a REC.
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Regulatory database listings of off-site properties which have a reasonable potential to impact the Project were also evaluated. The determination of a listing to affect the Project is based on, but not limited to, factors such as the topographic gradient in relation to the Project, the estimated groundwater flow direction in the vicinity of the Project, the distance between the listed site and the Project, the type of site or materials involved, and/or whether a release to the environment is known or likely to have occurred. Three properties were evaluated and determined to be unlikely to have impacted the Project and therefore does not represent a REC. (EMG, 2018, p. 39)

A copy of the full regulatory database report is included in Appendix H of the EMG, appended to this EIR as Appendix F.

☐ *Historical Environmental Documentation*

Previous environmental assessments indicated that a 1,000-gallon fuel oil UST was reportedly installed at the Project in 1979 and removed in 1989. Based on information obtained from prior reports and on-site personnel, this UST may have been located on an adjacent property that was not located on the Project site. However, information from a March 1994 Phase I ESA, prepared by ATC indicated that the tank was removed in 1989 by Conservtech Inc. A limited subsurface investigation was performed, by GTI in 1994 in which no contaminants were detected. No further action was required by the Los Angeles County Department of Public Works (LACDPW). A letter from the LACDPW dated 1989 indicated that based on subsurface investigations, the Project was not formerly utilized as a disposal site. No further action or investigation was recommended regarding historical USTs at the Project. (EMG, 2018, p. 30)

EMG identified previously-identified asbestos-containing material in the form of spray-on fireproofing, located in an exhaust shaft which originated from the chiller room and extended through the third and fourth floors. EMG reviewed the Asbestos Operations & Maintenance (O&M) Program dated October 19, 2011. Additionally, given the date of the existing buildings, EMG also concluded that there was a potential presence of lead-based paint at the Project site. A copy of a Lead-Based Paint O&M Program for the Project, prepared by EMG and dated October 18, 2011, was also reviewed. Both programs were properly designed to meet regulatory standards. (EMG, 2018, p. 30)

☐ *Site Reconnaissance*

Representatives of EMG conducted a site reconnaissance at the Project site on July 2, 2018. In accordance with ASTM E1527-13, EMG visually observed the interior common areas, maintenance and repair areas, and a representative sample of occupant spaces, and periphery of the Project and all structures to the extent not obstructed by obstacles. (EMG, 2018, p. 11) During site reconnaissance,



EMG observed portions of the Office Building and Cafeteria Building, including maintenance areas, mechanical areas, office areas, meeting rooms, lobby, and restrooms. EMG observed the presence of hazardous materials and petroleum products. EMG's observations of hazardous materials include: 1) two emergency generators, a 300-gallon diesel belly tank (or, above ground storage tanks) (AST) and a 350-gallon diesel belly tank (AST); 2) a five gallon diesel AST for generator 1; 3) a utility-owed pad-mounted transformer; 4) hydraulic elevator equipment; janitorial and maintenance supplies, dishwashing supplies, and HVAC water treatment chemicals; 5) domestic sewage, municipal trash, and cooking grease; and 6) HVAC chiller units and cooling towers. Review of the hazardous materials use and storage at the Project did not identify any RECs or environmental concerns with regard to the materials observed during reconnaissance. (EMG, 2018, pp. 11-12)

4.6.2 Regulatory Framework

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hazards and hazardous materials.

A. Federal Regulations

- ☐ *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)*

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. (EPA, 2017d)

EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed. (EPA, 2017d)

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. (EPA, 2017d)

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). (EPA, 2017d)



☐ *Resource Conservation and Recovery Act (RCRA)*

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. (EPA, 2016b)

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program. (EPA, 2016b)

☐ *Hazardous Materials Transportation Act (HMTA)*

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property." (OSHA, n.d.)

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177 (OSHA, n.d.)

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement. (OSHA, n.d.)

☐ *Hazardous Materials Transportation Uniform Safety Act of 1990*

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. (OSHA, n.d.)

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials. (OSHA, n.d.)



☐ *Healthy Forests Restoration Act of 2003*

On August 22, 2002, President Bush established the Healthy Forests Initiative, directing the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. On June 5, 2003, the Departments of Agriculture and the Interior adopted two new categorical exclusions from documentation in an environmental assessment or environmental impact statement (EIS): an exclusion for hazardous-fuel reduction and another for rehabilitation of resources and infrastructure damaged by wildfire. (68 FR 33814)

This act also defines “communities at risk” as those “wildland urban interface communities within the vicinity of federal lands that are at high risk from wildfire.” For California, CalFire has expanded this definition to include all communities (regardless of distance from federal lands) for which a significant threat to human life or property exists as a result of a wildland fire event. According to the 2010 California Strategic Fire Plan (page E-1), factors used to determine at-risk communities include: high fuel hazard, probability of a fire and proximity of intermingles wildland fuels, and urban environments near fire threats.

☐ *Occupational Safety and Health Act (OSHA)*

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. (EPA, 2016a)

In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. (EPA, 2016a)

☐ *Toxic Substances Control Act*

The Toxic Substances Control Act of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls, asbestos, radon, and lead-based paint. (EPA, 2016c)

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture.



- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found.
- Issue Significant New Use Rules, under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons. (EPA, 2016c)

B. State Regulations

☐ *Cal/OSHA and the California State Plan*

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace.

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels



and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses.

☐ *California Hazardous Waste Control Law*

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Article 2, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a “cradle-to-grave” waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA).

☐ *California Code of Regulations (CCR), Titles 22 and 26*

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as “Title 22.”

C. Local Regulations

☐ *Los Angeles County Fire Department*

The Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division (HHMD) is the Certified Unified Program Agency (CUPA) for most of Los Angeles County, including the City of Commerce, the local agency certified by the CalEPA to implement the local Unified Program. Accordingly, in addition to providing emergency response to hazardous materials releases, the LACoFD HHMD also oversees Hazardous Materials Business Plans, the underground and aboveground storage tank programs, the California Accidental Release Prevention Program.



☐ *City of Commerce*

The Public Safety Element of the City of Irwindale General Plan identifies policies focusing on issues related to hazards, such as emergency preparedness. An analysis of the Project's consistency with the applicable policies of the City's General Plan is included in EIR Subsection 4.7, *Land Use and Planning*. Additionally, Chapter 16 of the City of Commerce Municipal Code adopts by reference Title 32 of the Los Angeles County Fire Code (City of Commerce, 2019, Chapter 16). Furthermore, the City of Commerce Municipal Code § 6.17.060 regulates use, storage, manufacture, or disposal of hazardous materials according to the standards established by the EPA, the California Department of Health Services, the Los Angeles County Fire Code, and as otherwise outlined in the Municipal Code. (City of Commerce, 2019, § 6.17.060)

4.6.3 Methodology

The Phase I ESA, Appendix F of this EIR, was prepared using ASTM Standard Practice E 1527-13. In accordance therewith, the level of environmental assessment was guided by several factors, including the type of property and the risk tolerance of the user. Interviews were conducted with individuals knowledgeable about the Project site and about potential contamination, available pertinent documents (such as historical records and government information systems) were reviewed by EMG, and visual observations of the Project site and adjacent properties were conducted to identify high-risk contaminants and high-risk neighbors. The Phase I ESA also included assessment of considerations which are otherwise beyond the scope of ASTM Standard Practice E 1527-13, including assessments of Asbestos Containing Materials, Radon Gas, and Lead-Based Paint.

4.6.4 Basis for Determining Significance

Section IX of Appendix G to the CEQA Guidelines addresses typical adverse effects to hazards and hazardous materials, and includes the following thresholds to evaluate the Project's impacts on hazards and hazardous materials (OPR, 2018). The Project would be considered to have a significant impact associated with hazards and hazardous materials if the Project or any Project-related components would:

- a. Create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials;*
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment;*
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment;*



- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;*
- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or*
- g. Expose people or structures, either directly or indirectly, to significant risk of loss, injury or death involving wildland fires.*

As previously presented in the Project's Initial Study (Appendix A), the Project has been assessed under Thresholds d), e), and f) to have less than significant impacts, and the Project would have no impact with regard to Threshold g). The Project site is not located on a site in which would pose a significant hazard to the public or environment pursuant to Government Code Section 65962.5; the Project site is not located within an airport land use plan or within two miles of a public airport; the Project would not impair or physically interfere with the Los Angeles County adopted an Operational Area Emergency Response Plan (OAERP), any of the daily operations of the Los Angeles County Fire Department or City's Urban Search and Rescue team, or local emergency services; and the Project is not located within a high fire severity or wildland fire zone and would not expose people or structures to significant risk of loss, injury, or death involving wildfires (T&B Planning, 2020, 3-21, -24). Accordingly, analysis in this EIR Section will not assess the thresholds discussed in this paragraph.

4.6.5 Impact Analysis

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

Threshold 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?*

A. Impacts Associated with Existing Site Conditions

Based on the Project-specific Phase I ESA (EIR Appendix F), the Project site does not contain any RECs, HRECs, CRECs, significant data gaps, or significant business risks in connection with the Project, except for a potential that asbestos containing materials (ACM) exist at the Project site.

B. Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors, cranes) would be operated on the Project site during construction of the Project. This heavy equipment may be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is



a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than what would occur on any other similar construction site. Construction contractors shall be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, DTSC, Los Angeles Regional Water Quality Control Board (RWQCB), LACoFD, and the City of Commerce. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or risk of upset during the construction phase. A less than significant impact would occur.

☐ *Demolition*

Demolition of buildings has the potential to expose and disturb ACMs, causing encapsulated ACMs to become friable and, once airborne, they are considered a carcinogen. Such releases could pose significant risks to persons living and working in and around the project site, as well as to project construction workers. Abatement of ACM encountered during any future building demolition would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA, OSHA, US Department of Housing and Urban Development, Cal/OSHA, and SCAQMD. Asbestos Hazards are assessed and abated as necessary in accordance with CCR Title 8, Section 1529.

The EPA requires that all asbestos work performed within regulated areas be supervised by a competent person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, 40 CFR 763) (EPA, 2007). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACMs prior to any demolition or renovation activities. Should ACMs be identified, Rule 1403 requires that ACMs be safely removed and disposed of at a regulated site, if possible. If it is not possible to safely remove ACMs, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in significant release of asbestos. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of CCR Title 8, Section 1529 (Asbestos), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos. While exposure to ACMs is a potentially significant impact, adherence to the existing rules and regulations ensures that the Project will have a less than significant impact.

Considering the date of construction for the existing Project buildings (1957 and 1965), there is a potential that lead-based paint was utilized at the Project site. The Lead Paint Poisoning Act banned the use of lead paint starting January 1, 1978, and all paint applied prior to that date is considered suspect for containing lead. EMG observed painted surfaces in generally good condition, with no chipping, peeling, or cracking paint observed. The Lead-Based Paint Operations and Maintenance Program prepared for the Project is adequately designed to meet regulatory standards, and a less than significant impact would occur.



☐ *Grading*

Construction activities required to develop the Project site would involve the disturbance of onsite soils. As stated, there were no identified impacted soils found onsite; no RECs or HRECs were identified that would negatively impact the environment. Therefore, the risk of exposure of hazardous materials to workers and the public through the routine, transport, use, or disposal of contaminated soils would be less than significant.

C. Long-Term Operational Activities

Future users of the proposed on-site Project building are not yet known. Future uses on-site are assumed to be those permitted by the City of Commerce General Plan and zoning designations. Future operations have the potential to use hazardous materials (i.e., gasoline, diesel, biodiesel fuels, and oil) during the course of daily operations at the Project site. In the event that hazardous materials, other than those common materials described above, are associated with future warehouse operations, the hazardous materials would only be stored and transported to and from the building site. Federal and State Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals that may be used by the businesses that would operate at the Project site. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Pursuant to the City of Commerce Municipal Code, any business involved in the use, production, storage, or transfer of any material defined as hazardous and subject to regulation by Los Angeles County Department of Health and/or subject to regulation by the South Coast Air Quality Management District per Rules 1401, 1402, and 1403. Such businesses are also required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which require immediate reporting to Los Angeles County Fire Department and State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business.

The operation of the Project would be required to comply with all applicable federal, State, and local regulations to ensure the proper transport, use, and disposal of hazardous substances (as described in Subsection 4.6.2 above). With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project is not expected to pose a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, nor would the Project increase the potential for accident operations which could result in the release of hazardous materials into the environment.

With mandatory regulatory compliance with federal, State, and local laws (as described above), potential hazardous materials impacts associated with long-term operation of the Project are regarded as less than significant.



Threshold 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?

The Project is located within an industrial and urbanized area and is within approximately a quarter mile of the Bandini Elementary school surrounded by a residential neighborhood to the north at 2318 Coutts Avenue, Commerce, CA. The proposed Project would be required to comply with applicable laws and regulations governing the use, storage, and transportation of hazardous materials. The Project's proposed warehouse operations would be conducted mainly inside of enclosed buildings, with the exception of truck deliveries that would occur in the loading dock areas.

The Project site is within immediate proximity to the I-710 and I-5 Freeways, truck traffic associated with the proposed Project will travel along designated truck routes and would not travel through locally designated streets nearby residential areas (nearest residential neighborhood is located approximately 0.12 mile to the north), where the closest public schools are located (i.e., Bandini, which is located approximately 0.25 mile north of the Project site; and Rosewood Park School, which is located approximately .66 miles to the southwest of the Project site). Trucks are only permitted on posted truck routes, and no truck routes that Project-related trucks would be able to utilize are located adjacent to these existing schools.

Improper use, storage, or transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public (including nearby schools), and the environment. As stated previously, the use, storage, transport, and disposal of hazardous materials would be governed by existing regulations and impacts would be less than significant. As such, the proposed Project would have no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Diesel emissions from truck traffic associated with the Project are evaluated as part of a health risk assessment, as discussed in Subsection 4.2, *Air Quality*, of this EIR. This assessment considers potential health risks to the nearby sensitive receptors (i.e., residents and students), and concludes that the Project's cancer and non-cancer risks to sensitive receptors would be less than significant.

4.6.6 Cumulative Impact Analysis

The Project's temporary construction activities would entail the storage, handling and use of hazardous substances; however, there would be no greater risk associated with the transport, use, disposal, or accidental release of these substances than would occur on any other similar construction site, and impacts would be less than significant. Similarly, any other developments in the area proposing the construction of uses for the potential for use, storage, or transport of hazardous materials also would be required to comply with the same federal, State, and local regulations as the Project, which would preclude potential adverse impacts related to hazardous materials.



As concluded under Threshold a, operation of the proposed Project would be required to comply with all applicable federal, State, and local regulations to ensure the proper transport, use, or disposal of hazardous substances, which would ensure that operation of the Project would have a less than significant impact related to the release of hazardous materials into the environment. Because the Project and nearby cumulative development would not result in adverse impacts related to handling, transport, storage, and treatment of hazardous materials due to mandatory compliance with federal, State, and local regulations that require that minimum, adequate safety standards are met, there is no potential for a cumulative impact to occur related to hazardous materials, including under routine and accident conditions.

The Project is located within approximately a quarter mile of the Bandini Elementary school. The proposed Project would be required to comply with applicable laws and regulations governing the use, storage, and transportation of hazardous materials. The Project's proposed warehouse operations would be conducted mainly inside of enclosed buildings, with the exception of truck deliveries that would occur in the loading dock areas. Further, trucks all trucks traveling to and from the Project site would be required to take the designated traffic routes and Project-related trucks would not travel adjacent to the existing schools. Therefore, the Project does not have the potential to combine with other development projects to result in substantial hazardous materials-related impacts within 0.25-mile of the Project site.

4.6.7 Significance of Impacts Before Mitigation

Threshold a and b: Less than Significant Impact. The Project-specific Phase I ESA (EIR Appendix F) did not identify any existing RECs, HRECs, CRECs, significant data gaps, or significant business environmental risks in connection with the Project, except for a potential business environmental risk surrounding the possibility of ACM on the existing buildings based on their date of construction. The Project would involve construction and uses in conformance with the City of Commerce General Plan, and future operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, and disposal of hazardous substances. The existing O&M program, dated October 18, 2011, is sufficient to maintain the ACMs in accordance with current regulatory standards. Furthermore, as the Project proposes demolition of the ACM building, short-term construction and demolition of existing buildings activities would have the potential to expose and disturb ACMs. Abatement of ACM encountered during any future building demolition would be required to be conducted in accordance with all applicable regulations. Accordingly, the Project would result in less than significant impacts with respect to hazardous materials.

Threshold c: Less-than-Significant Impact. The Project site is located approximately one-quarter mile of an existing school, but has no potential to have a project related or cumulatively considerable effect associated with the emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. Despite the Project site proximity to the nearest school, the industrial and commercial business operations will be conducted within enclosed spaces, except for truck deliveries which will be conducted at loading docks behind the proposed building. Further, due



to the Project site's close proximity to the I-705 and I-5 Freeways and compliance with designated truck routes. Impacts would be less than significant.

4.6.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.6.9 Significance after Mitigation

Impacts would be less than significant.



4.7 NOISE

The analysis in this section is based on a site-specific noise impact analysis titled “5200 Sheila Street Noise Impact Analysis, dated October 6, 2020. The report (herein, “Noise Impact Analysis”) was prepared by Urban Crossroads, Inc. (Urban Crossroads) and is included as Appendix H to this EIR. All references used in this section are included in EIR Section 7.0, *References*.

4.7.1 NOISE FUNDAMENTALS

A. Noise Definitions

Noise is simply defined as “unwanted sound.” Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. (Urban Crossroads, 2020e, p. 9)

B. Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous noise levels. The most commonly used figure is the equivalent continuous noise level (Leq). Leq represents a steady state sound level containing the same total energy as a time varying signal over a given time period. Leq values are not measured directly but are calculated from sound pressure levels typically measured in dBA. (Urban Crossroads, 2020e, p. 10)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour levels may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of five (5) dB to sound levels in the evening from 7:00 p.m. to 7:00 p.m., and the addition of 10 dB to sound levels at night between 7:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and nighttime hours when sound appears louder. CNEL does not represent the actual sound level heard at any particular time, but rather represents the total sound exposure. The City of Commerce relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources. (Urban Crossroads, 2020e, p. 10)

C. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on geometric spreading, ground absorption, atmospheric effects, shielding, and reflection. (Urban Crossroads, 2020e, p. 10)



1. *Geometric Spreading*

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2020e, p. 10)

2. *Ground Absorption Noise*

To account for the ground-effect attenuation (absorption) of noise, two types of site conditions are commonly used in noise models: soft site and hard site conditions. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. (Urban Crossroads, 2020e, pp. 10-11)

3. *Atmospheric Effects*

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors that may affect noise levels include air temperature, humidity, and turbulence. (Urban Crossroads, 2020e, p. 11)

4. *Shielding*

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Solid objects or barriers are most effective at attenuating noise levels. Effective noise barriers can reduce noise levels by 10 to 15 dBA. Noise barriers, however, do have limitations. For a noise barrier to work, it must be high enough and long enough to block the path of the noise source. (Urban Crossroads, 2020e, p. 11)

5. *Reflection*

Field studies conducted by the Federal Highway Administration (FHWA) have shown that the reflection from barriers and buildings does not substantially increase noise levels. If all the noise striking a structure was reflected back to a given receiving point, the increase would be theoretically limited to 3 dBA. Further, not all the acoustical energy is reflected back to same point. Some of the energy would go over the structure, some is reflected to points other than the given receiving point,



some is scattered by ground coverings (e.g., grass and other plants), and some is blocked by intervening structures and/or obstacles (e.g., the noise source itself). Additionally, some of the reflected energy is lost due to the longer path that the noise must travel. FHWA measurements made to quantify reflective increases in traffic noise have not shown an increase of greater than 1-2 dBA; an increase that is not perceptible to the average human ear. (Urban Crossroads, 2020e, p. 11)

D. Response to Noise

Approximately 10% of the population has a very low tolerance for noise and will object to any noise not of their own making. Consequently, even in the quietest environment, some complaints will occur. Another 25% of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given environment. Despite this variability in behavior on an individual level, the population as a whole can be expected to exhibit the following responses to changes in noise levels: an increase of 1 dBA cannot be perceived except in carefully controlled laboratory experiments; a change of 3 dBA is considered “barely perceptible;” and a change of 5 dBA is considered “readily perceptible.” (Urban Crossroads, 2020e, pp. 12-13)

E. Vibration

Vibration is the periodic oscillation of a medium or object. Sources of groundborne vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and decibels (dB) and is denoted as VdB. (Urban Crossroads, 2020e, pp. 13-14)

The background vibration-velocity level in residential areas is generally 50 VdB. Groundborne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. (Urban Crossroads, 2020e, p. 14)

4.7.2 EXISTING NOISE CONDITIONS

A. Existing Ambient Noise Environment

Urban Crossroads recorded 24-hour noise readings at four locations near the Project site on February 19, 2019. The noise measurement locations are identified in Figure 4.7-1, *Noise Measurement Locations*. The results of the existing noise level measurements are summarized below. Refer to Appendix 5.2 of Appendix H for the noise measurement worksheets used to calculate the noise levels, including a summary of the hourly noise levels and the minimum and maximum observed noise levels at each measurement location. The existing ambient noise levels in the vicinity of the Project site are dominated by traffic noise associated with automobiles and truck traffic on the local arterial roadway network. (Urban Crossroads, 2020e, pp. 25-27)



- Location L1 represents the noise levels north of the Project site on Cowlin Avenue near existing single-family residential homes. The noise level measurements collected show an overall 24-hour exterior noise level of 72.0 dBA CNEL. The average daytime noise level was calculated at 67.3 dBA Leq with an average evening noise level of 65.7 dBA Leq and an average nighttime noise level of 65.0 dBA Leq.
- Location L2 represents the noise levels north of the Project site on Sheila Street near the Ross Health Care Clinic. The noise level measurements collected show an overall 24-hour exterior noise level of 87.7 dBA CNEL. The average daytime noise level was calculated at 82.8 dBA Leq with an average evening noise level of 80.6 dBA Leq and an average nighttime noise level of 80.8 dBA Leq.
- Location L3 represents the noise levels northeast of the Project site on Wilma Avenue near existing single-family residential homes. The noise level measurements collected show an overall 24-hour exterior noise level of 66.7 dBA CNEL. The average daytime noise level was calculated at 62.8 dBA Leq with an average evening noise level of 60.5 dBA Leq and an average nighttime noise level of 59.4 dBA Leq.
- Location L4 represents the noise levels northeast of the Project site on East Washington Boulevard next to Inclusion Services Adult Day Program. The noise level measurements collected show an overall 24-hour exterior noise level of 79.1 dBA CNEL. The average daytime noise level was calculated at 74.3 dBA Leq with an average evening noise level of 72.0 dBA Leq and an average nighttime noise level of 72.1 dBA Leq.

B. Existing Ground-borne Vibration

The Project site is occupied with two office buildings under existing conditions; minimal groundborne vibration due to automobiles and trucks occur on the site.



LEGEND:

▲ Measurement Locations

Source(s): Urban Corssroads (04-18-2020)

Figure 4.7-1



Not to Scale



Noise Measurement Location



4.7.3 REGULATORY FRAMEWORK

The following is a brief description of the Federal, State, and local environmental laws and related regulations governing noise.

A. Federal Regulations

1. *Noise Control Act of 1972*

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA, 2019)

While primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce, control of which require national uniformity of treatment. The Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all Federal agencies relating to noise research and noise control. (EPA, 2019)

2. *Federal Transit Administration*

The Federal Transit Administration (FTA) published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact. (FTA, 2018, p. 1)

3. *Federal Highway Administration*

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with Federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 CFR 772 Procedures for Abatement of Highway Traffic Noise and Construction Noise, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design. (FHWA, 2017)



The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in Title 23 of the United States Code of Federal Regulations Part 772. The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of federal-aid highway funds for construction or reconstruction of a highway. (FHWA, 2017)

4. *Construction-Related Hearing Conservation*

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2002)

B. State Regulations

1. *State of California Noise Requirements*

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city in the State of California adopt a General Plan that includes a Noise Element, which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. (Urban Crossroads, 2020e, p. 17)

2. *State of California Building Standards Code*

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA Leq for any hour of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required. (Urban Crossroads, 2020e, p. 17)



3. *OPR General Plan Guidelines*

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor’s Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating General Plans. The Guidelines provide direction on the required Noise Element portion of the General Plans. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. Local governments must “analyze and quantify” noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that “minimizes the exposure of community residents to excessive noise.” Noise level contours must be mapped and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. The Noise Element directly correlates to the Land Use, Circulation, and Housing Elements. The Noise Element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses. (OPR, 2017, pp. 131-132)

C. Local Regulations

1. *City of Commerce General Plan Safety Element*

The City of Commerce General Plan Safety Element addresses the control and abatement of environmental noise to protect the citizens from excessive exposure to noise. The Safety Element includes those issues mandated by the State for consideration in noise elements and specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources, such as arterial roads, freeways, airports, and railroads. In addition, the Safety Element identifies several policies to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. The Safety Element contains the following policies related to the Project – Safety Policies 6.1, 6.3 through 6.5, 6.7, and 6.8. (Urban Crossroads, 2020e, pp. 17-18)

To ensure noise-sensitive land uses are protected from high levels of noise, the City of Commerce has developed its own land use compatibility standards, based on recommended parameters from the Governor’s OPR. Table 7-1 of the Safety Element identifies standards to evaluate noise and land use compatibility. The City’s land use compatibility standards use the CNEL noise descriptor and are intended to be applicable for land use designations exposed to noise levels generated by transportation related sources. These guidelines indicate the compatibility of noise-sensitive land uses in areas subject to noise levels of 55 to 80 dB CNEL. To control stationary noise sources from industrial, commercial, and manufacturing facilities that may affect sensitive land uses, Safety Policy 6.3 requires that City continue to enforce the noise control ordinance. The City’s noise control ordinance, together



with the General Plan, establishes exterior noise standards for a wide range of land uses in the City. (Urban Crossroads, 2020e, p. 18)

2. *City of Commerce Municipal Code*

☐ **Construction-Related Noise Standards**

Section 19.19.160(K)(3) of the City of Commerce Municipal Code establishes limits to the hours of operation for construction activities. Specifically, no person or organization within 500 feet of a residential zone shall operate equipment or perform any outside construction or repair work on buildings, structures, or projects, or operate any pile driver, steam shovel, pneumatic hammer, derrick, steam, electric hoist, or other construction type device between the hours of 10 p.m. and 7 a.m., unless a permit has been obtained from the City. (Urban Crossroads, 2020e, p. 19)

☐ **Operational Noise Standards**

To analyze noise impacts originating from a designated fixed location or private property such as 5200 Sheila Street Project, stationary-source (operational) noise such as the expected loading dock activity, entry gate & truck movements, roof-top air conditioning units, and trash enclosure activity are typically evaluated against standards established under a jurisdiction's Municipal Code. Section 19.19.160 of the City of Commerce Municipal Code contains the exterior noise level standards for residential, commercial, and industrial land uses as shown in Table 4.7-1, *Operational Noise Standards*. (Urban Crossroads, 2020e, p. 19)



Table 4.7-1 Operational Noise Standards

City	Land Use	Exterior Noise Level Standards (dBA Leq) ²		
		Daytime	Evening	Nighttime
Commerce ¹	Residential	55	50	45
	Commercial	65	65	55
	Industrial	70	70	70

Source: (Urban Crossroads, 2020e, Table 3-1)

¹ City of Commerce Municipal Code, Section 19.19.160 Noise (Appendix 3.1).

² Leq represents a steady state sound level containing the same total energy as a time varying signal over a given period.

"Daytime" = 7:00 a.m. to 7:00 p.m.; "Evening" = 7:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

4.7.4 METHODOLOGY

A. Construction Noise Analysis

For the construction noise analysis, Urban Crossroads relies on reference noise level measurements that they previously collected at construction sites throughout southern California. The reference noise level measurements included the types of construction equipment that would be used on the Project site performing similar types of construction activities at a similar level of activity/intensity as is expected to occur on the Project site. Table 4.7-2, *Construction Reference Noise Levels*, provides a summary of the reference noise level measurements. Because the reference noise measurements were collected at varying distances, all construction noise level measurements presented in Table 4.7-2 were normalized by Urban Crossroads to describe a common reference distance of 50 feet. (Urban Crossroads, 2020e, p. 53)



Table 4.7-2 Construction Reference Noise Levels

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA Leq)	Highest Reference Noise Level (dBA Leq)
Demolition	Demolition Activity	67.9	71.9
	Backhoe	64.2	
	Water Truck Pass-By & Backup Alarm	71.9	
Site Preparation	Scraper, Water Truck, & Dozer Activity	75.3	75.3
	Backhoe	64.2	
	Water Truck Pass-By & Backup Alarm	71.9	
Grading	Rough Grading Activities	73.5	73.5
	Water Truck Pass-By & Backup Alarm	71.9	
	Construction Vehicle Maintenance Activities	67.5	
Building Construction	Foundation Trenching	68.2	71.6
	Framing	62.3	
	Concrete Mixer Backup Alarms & Air Brakes	71.6	
Paving	Concrete Mixer Truck Movements	71.2	71.2
	Concrete Paver Activities	65.6	
	Concrete Mixer Pour & Paving Activities	65.9	
Architectural Coating	Air Compressors	65.2	65.2
	Generator	64.9	
	Crane	62.3	

Source: (Urban Crossroads, 2020e, Table 10-1)

The construction noise analysis evaluates Project construction-related noise levels at the closest nearby receiver locations in the Project study area. A total of four receiver locations were considered in the construction noise analysis, including an adult day care center and existing dwelling units located north and northeast of the Project site. The following four receiver locations used in the construction noise analysis are shown on Figure 4.7-2, *Noise Receiver Locations*, and described below. The modeled noise-sensitive receiver locations are representative of existing receptors nearest the Project site. It is not necessary to study every single receiver location surrounding Project's construction area because receivers located at a similar distance from Project-related construction activities with similar ground elevations, orientation, and intervening physical conditions as the four modeled receptor locations would experience the same or very similar noise effects as those disclosed herein, and those at a greater distance would experience lesser noise effects.



Source(s): Urban Corssroads (04-18-2020)

Figure 4.7-2



Not to Scale



Noise Receiver Location



- R1: Location R1 represents the existing noise sensitive residence at 5101 E Washington Boulevard, approximately 729 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R1 is placed at the residential building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment. (Urban Crossroads, 2020e, p. 39)
- R2: Location R2 represents the commerce corner commercial center at 2470 S Atlantic Boulevard, approximately 74 feet north of the Project site. Receiver R2 is placed at the building façade of this non-noise sensitive land use. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment. (Urban Crossroads, 2020e, p. 39)
- R3: Location R3 represents the existing noise sensitive residence at 2415 Wilma Avenue approximately 540 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R3 is placed at the residential building façade. A 24-hour noise measurement near this location, L3, is used to describe the existing ambient noise environment. (Urban Crossroads, 2020e, p. 39)
- R4: Location R4 represents the existing noise sensitive Inclusion Services Adult Day Program at 5261 E Washington Boulevard, approximately 457 feet northeast of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R4 is placed at the residential building façade. A 24-hour noise measurement near this location, L4, is used to describe the existing ambient noise environment. (Urban Crossroads, 2020e, p. 39)

B. Stationary Noise Analysis

For the operational stationary noise analysis, Urban Crossroads relies on reference noise level measurements that it previously collected at industrial facilities throughout southern California. The reference noise level measurements included the types of equipment and site operations that are expected on the Project site. Table 4.7-3, *Operational Reference Noise Levels*, provides a summary of the reference noise level measurements. Because the reference noise measurements were collected at varying distances, all operational noise level measurements presented in Table 4.7-3 were normalized by Urban Crossroads to describe a common reference distance of 50 feet. (Urban Crossroads, 2020e, p. 53)

The stationary noise analysis evaluates Project-related noise levels at the nearby receiver locations in the Project study area. The receiver locations used in the stationary noise analysis are the same that are used in the construction analysis (refer to Figure 4.7-2, *Noise Receiver Locations*). As discussed earlier in this Subsection, it is not necessary to study every single receiver location surrounding Project site because receivers located at similar distances from the Project site with similar ground elevations, orientation, and intervening physical conditions (e.g., walls, landscaping) as the modeled receptor locations would experience noise levels the same or very similar to those disclosed herein.



Table 4.7-3 Operational Reference Noise Levels

Noise Source	Duration (hh:mm:ss)	Ref. Distance (Feet)	Noise Source Height (Feet)	Min./Hour ⁵		Reference Noise Level (dBA Leq)		Sound Power Level (dBA) ⁶
				Day	Night	@ Ref. Dist.	@ 50 Feet	
Loading Dock Activity ¹	00:15:00	30'	8'	60	60	67.2	62.8	103.4
Entry Gate & Truck Movements ²	00:15:00	20'	8'	7	7	64.0	58.0	89.7
Roof-Top Air Conditioning Units ³	96:00:00	5'	5'	39	28	77.2	57.2	88.9
Trash Enclosure Activity ⁴	00:00:32	5'	5'	5	5	77.3	57.3	94.0

¹As measured by Urban Crossroads, Inc. at the Motivational Fulfillment & Logistics Services distribution facility in the City of Chino.

²As measured by Urban Crossroads, Inc. at the Nature's Best Distribution Facility in the City of Chino.

³As measured by Urban Crossroads, Inc. at the Santee Walmart located at 170 Town Center Parkway.

⁴As measured by Urban Crossroads, Inc. at a commercial and office park trash enclosure in the City of Costa Mesa.

⁵Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Day" = 7:00 a.m. to 10:00 p.m.; "Night" = 10:00 p.m. to 7:00 a.m.

⁶Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

⁷Entry Gate & Truck Movements are calculate based on the number of events by time of day.

Source: (Urban Crossroads, 2020e, Table 9-1)

C. Transportation-Related Noise Analysis

Transportation-related noise impacts were projected using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108 (the "FHWA Model"). The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California, the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMELs to account for: 1) roadway classification (e.g., collector, secondary, major or arterial), 2) roadway travel width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), 3) total average daily traffic (ADT), 4) travel speed, 5) percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, 6) roadway grade, 7) angle of view (e.g., whether the roadway view is blocked), 8) site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and 9) percentage of total ADT that flows each hour throughout a 24-hour period. (Urban Crossroads, 2020e, p. 29)

Table 4.7-4, *Roadway Parameters*, presents the FHWA Model roadway parameters used for each of the seven roadway segments in the Project's study area. For the purpose of the off-site analysis, soft site conditions were used to analyze the traffic noise impacts on each roadway segment in the study area because landscaping typically exists between the street surface and the noise receiver. (Urban Crossroads, 2020e, p. 29)



To quantify transportation-related noise levels, the vehicular trips associated with the Project were assigned to the seven roadway segments in the Project's study area, using the trip distribution and vehicle mix information contained in the Project's traffic impact analysis prepared by Urban Crossroads (refer to Appendix H) (Urban Crossroads, 2020e, p. 29).

Table 4.7-4 Roadway Parameters

ID	Roadway	Segment	Receiving Land Use ¹	Distance from Centerline to Receiving Land Use (Feet) ²	Vehicle Speed (mph) ³
1	Ralph Lieberman Av.	n/o Sheila St.	CM	40'	40
2	Ralph Lieberman Av.	s/o Sheila St.	CM/I	40'	40
3	Ralph Lieberman Av.	s/o Dwy. 2	CM	40'	40
4	Sheila St.	w/o Dwy. 1	CM/I	40'	40
5	Sheila St.	e/o Dwy. 1	CM/I	40'	40
6	Sheila St.	e/o Ralph Lieberman Av.	CM/I	40'	40
7	Sheila St.	e/o Dwy. 3	CM/I	40'	40

¹City of Commerce General Plan Land Use Map.

²Distance to receiving land use is based upon the right-of-way distances.

³"CM"= Commercial Manufacturing; "I"= Industrial.

Source: (Urban Crossroads, 2020e, Table 6-1)

D. Vibration

Vibration levels were predicted using reference vibration levels and logarithmic equations contained in the Federal Transit Administration's (FTA) 2018 publication: "Transit Noise and Vibration Impact Assessment." The vibration source levels for Project construction equipment are summarized in Table 4.7-5, *Vibration Source Levels for Construction Equipment*. (Urban Crossroads, 2020e, p. 32)

Table 4.7-5 Vibration Source Levels for Construction Equipment

Equipment	Vibration Decibels (VdB) at 25 feet
Small bulldozer	58
Jackhammer	79
Loaded Trucks	86
Large bulldozer	87

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment

Source: (Urban Crossroads, 2020e, Table 10-4)



4.7.5 BASIS FOR DETERMINING SIGNIFICANCE

Appendix G to the CEQA Guidelines addresses typical adverse effects related to noise, and includes the following threshold questions to evaluate the Project's impacts on forest and agricultural resources (OPR, 2019).

- 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?*
- b. *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*
- c. *Would the Project result in, for a project located within the vicinity of a private airstrip or an airport land use 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?*

As previously presented in the Project's Initial Study (Appendix A), the Project site is not located within two miles of a public airport or within an airport land use plan. The closest airport major airport is the El Monte Airport located approximately 9.2 miles northeast of the Project site (T&B Planning, 2020, 3-31). Accordingly, the analysis in this section will not assess threshold c).

A. Overview of Noise Thresholds of Significance

While the City of Commerce General Plan Guidelines provide direction on noise compatibility and establish noise standards by land use type that are sufficient to assess the significance of noise impacts, they do not define the levels at which increases are considered substantial for use under Guideline A. (Urban Crossroads, 2020e, p. 21)

1. *Evaluation of Noise Impacts at Noise-Sensitive Receivers*

Noise level increases resulting from the Project are evaluated based on the Appendix G CEQA Guidelines described above at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. (Urban Crossroads, 2020e, p. 21)

In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. FICON identifies a *readily perceptible* 5 dBA or greater project-related noise level increase is considered a significant impact when the noise criteria for a given land use is exceeded. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA *barely perceptible* noise level increase appears to be appropriate for most people.



When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. (Urban Crossroads, 2020e, p. 22)

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or *readily perceptible*, 3 dBA or *barely perceptible*, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. (Urban Crossroads, 2020e, p. 22)

2. Evaluation of Noise Impacts at Non-Noise-Sensitive Receivers

To determine if Project-related traffic noise level increases are significant at off-site non-noise-sensitive land uses, a *readily perceptible* 5 dBA and *barely perceptible* 3 dBA criteria were used. When the without Project noise levels at the non-noise-sensitive land uses are below the *normally acceptable* 70 dBA CNEL compatibility criteria, a *readily perceptible* 5 dBA or greater noise level increase is considered a significant impact. When the without Project noise levels are greater than the *normally acceptable* 70 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already exceeded.

B. Summary of Significance Criteria

Noise impacts will be considered significant if any of the following occur as a result of the proposed Project. The significance criteria for noise impacts is summarized in Table 4.7-6, *Summary of Noise Significance Criteria*.

1. Off-Site Traffic Noise

- When the noise levels at existing and future noise-sensitive land uses (e.g. residential, etc.):
 - are less than 60 dBA CNEL and the Project creates a *readily perceptible* 5 dBA CNEL or greater Project-related noise level increase; or
 - range from 60 to 65 dBA CNEL and the Project creates a *barely perceptible* 3 dBA CNEL or greater Project-related noise level increase; or
 - already exceed 65 dBA CNEL, and the Project creates a community noise level increase of greater than 1.5 dBA CNEL.
- When the noise levels at existing and future non-noise-sensitive land uses (e.g., commercial, industrial):



- are less than the City of Commerce General Plan Safety Element, Table 7-1, *normally acceptable* 70 dBA CNEL and the Project creates a *readily perceptible* 5 dBA CNEL or greater Project related noise level increase; or
- are greater than the City of Commerce General Plan Safety Element, Table 7-1, *normally acceptable* 70 dBA CNEL and the Project creates a *barely perceptible* 3 dBA CNEL or greater Project noise level increase.

2. Operational Noise

Project operational activities would result in a significant impact if operational noise exceeds the levels allowed by the City of Commerce Municipal Code Section 19.19.160 as follows:

- If Project-related operational (stationary-source) noise levels exceed an exterior noise level of 55 dBA Leq, during the daytime hours of 7:00 a.m. to 7:00 p.m., 50 dBA Leq during the evening hours of 7:00 p.m. to 10:00 p.m. and 45 dBA Leq during the nighttime hour of 10:00 p.m. to 7:00 a.m. For commercial uses the municipal codes identifies a daytime noise level limit of 65 dBA Leq and a nighttime noise level limit of 55 dBA Leq. For industrial uses the municipal codes identifies a noise level limit of 70 dBA Leq anytime.
- If the existing ambient noise levels at the nearby noise-sensitive receivers near the Project site:
 - are less than 60 dBA Leq and the Project creates a *readily perceptible* 5 dBA Leq or greater Project-related noise level increase; or
 - range from 60 to 65 dBA Leq and the Project creates a *barely perceptible* 3 dBA Leq or greater Project-related noise level increase; or
 - already exceed 65 dBA Leq and the Project creates a community noise level increase of greater than 1.5 dBA Leq.

3. Construction Noise

Project construction activities would result in a significant impact if construction noise conflicts with the City of Commerce Municipal Code Section 19.19.160 as follows:

- If Project-related construction activities take place outside the permitted hours of 7:00 a.m. to 10:00 p.m.

Because the City's Municipal Code does not establish numerical construction noise thresholds for construction activities that occur during the hours permitted by the City of Commerce Municipal Code, Section 19.19.160, for the purposes of analyzing the significance of construction noise under CEQA, FTA's noise criteria as specified in the Transit Noise and Vibration Impact Assessment is used as the significance threshold for construction activities.

- If Project-related construction activities create noise levels which exceed the 80 dBA Leq acceptable noise level threshold at the nearby sensitive receiver locations.



4. Vibration

The City of Commerce Municipal Code does not define the numeric level at which a development project's vibration levels are considered "excessive." For purposes of this EIR, the metric used to evaluate whether the Project's vibration levels are considered "excessive" during either construction or operation is adapted from FTA's Transit Noise and Vibration Impact Assessment Manual.

- If Project generated vibration levels exceed the FTA's acceptable vibration thresholds of 78 VdB for daytime residential use and buildings where people normally sleep.

Table 4.7-6 Summary of Noise Significance Criteria

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive ¹	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive ^{1,2}	If ambient is < 70 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Residential	Exterior Noise Level Standards ³	55 dBA Leq	45 dBA Leq
	Commercial	Exterior Noise Level Standards ³	65 dBA Leq	55 dBA Leq
	Industrial	Exterior Noise Level Standards ³	70 dBA Leq	70 dBA Leq
	Noise-Sensitive ¹	If ambient is < 60 dBA Leq	≥ 5 dBA Leq Project increase	
		If ambient is 60 - 65 dBA Leq	≥ 3 dBA Leq Project increase	
		If ambient is > 65 dBA Leq	≥ 1.5 dBA Leq Project increase	
	Non-Noise-Sensitive ^{1,2}	If ambient is < 70 dBA Leq	≥ 5 dBA Leq Project increase	
		If ambient is > 70 dBA Leq	≥ 3 dBA Leq Project increase	
	Construction	Noise-Sensitive	Permitted between 7:00 a.m. to 10:00 p.m. ³	
Noise Level Threshold ⁴			80 dBA Leq	n/a
Vibration Level Threshold ⁴			78 VdB	n/a

¹FICON, 1992.

²City of Commerce General Plan Safety Element, Table 7-1

³City of Commerce Municipal Code, Section 19.19.160 Noise (Appendix 3.1).

⁴Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Source: (Urban Crossroads, 2020e, Table 4-1)



4.7.6 IMPACT ANALYSIS

Threshold 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?*

The analysis presented on the following pages summarizes the Project's potential construction noise levels and operational noise levels, including operational noise that would be generated on-site as well as off-site noise that would be generated by Project-related traffic. The detailed noise calculations for the analysis presented here are provided in Appendices 7.1 and 9.1 of Appendix H of this EIR.

A. Construction Noise Impact Analysis

Construction activities on the Project site would proceed in six stages: 1) demolition; 2) site preparation; 3) grading; 4) building construction; 5) paving; and 6) architectural coating. These activities would create temporary periods of noise when heavy construction equipment (i.e., bulldozer, trucks, concrete mixer, portable generators, power tools) is in operation and would cause a short-term increase in ambient noise levels. The Project construction noise levels at nearby receiver locations are summarized in Table 4.7-7, *Project Construction Noise Levels*.

Table 4.7-7 Project Construction Noise Levels

Receiver Location ¹	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	62.5	80	No
R2	73.4	80	No
R3	63.6	80	No
R4	64.0	80	No

¹Noise receiver locations are shown on Exhibit 10-A of Appendix H.

²Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations as shown on Table 10-2 of Appendix H.

³Construction noise level thresholds as shown on Table 4-1 of Appendix H.

⁴Do the estimated Project construction noise levels exceed the construction noise level threshold?

Source: (Urban Crossroads, 2020e, Table 10-3)

Project-related construction activities are expected to occur on weekdays (and, potentially, on Saturdays) during the hours when the City's Municipal Code does not restrict construction noise. The City's Municipal Code exempts construction activities from noise restrictions so long as construction activities within 500 feet of a residential zone occur between the hours of 7:00 a.m. and 10:00 p.m. Accordingly, Project construction would not exceed the standards established by the City of Commerce Municipal Code and impacts would be less than significant.



Because the City's Municipal Code does not establish numerical construction noise thresholds for construction activities that occur during the hours permitted by the City of Commerce Municipal Code, for the purposes of analyzing the significance of construction noise under CEQA, the FTA's construction noise criteria of 80 dBA Leq for an eight-hour period, as specified in the Transit Noise and Vibration Impact Assessment is used as the significance threshold for construction activities. As shown in Table 4.7-7, Project construction would not cause noise levels at receiver locations to exceed 80 dBA Leq. Accordingly, Project construction would not result in substantial noise-related health safety hazards.

B. Operational Noise Impact Analysis – Stationary Noise

Stationary (on-site) noise sources associated with long-term Project operation are expected to include loading dock activity, entry gate and truck movements, roof-top air conditioning units, and trash enclosure activity. As noted in Subsection 4.7.4B, the operational stationary noise analysis is based reference noise level measurements collected at industrial facilities throughout southern California. The reference noise level measurements included the types of equipment and site operations that are expected on the Project site and shown on Table 4.7-3, and included a distribution facility for loading dock activity and entry gate and truck movements (with a 50-foot distance to the reference source), and a commercial/office park (with a 50-foot distance to the reference source). (Urban Crossroads, 2020e, pp. 43-44) The daytime, evening, and nighttime Project stationary noise levels at nearby receiver locations are summarized in Table 4.7-8, *Project Operational Noise – Stationary Noise*, below.

Table 4.7-8 Project Operational Noise – Stationary Noise

Receiver Location ¹	Land Use	Project Operational Noise Levels (dBA Leq) ²			Noise Level Standards (dBA Leq) ³			Noise Level Standards Exceeded? ⁴		
		Day	Eve.	Night	Day	Eve.	Night	Day	Eve.	Night
R1	Residential	41.6	41.4	41.3	55	50	45	No	No	No
R2	Commercial	40.2	36.9	36.6	65	65	55	No	No	No
R3	Residential	39.7	39.0	38.4	55	50	45	No	No	No
R4	Residential	41.5	41.1	40.5	55	50	45	No	No	No

¹See Exhibit 8-A of Appendix H for the receiver locations.

²Proposed Project operational noise levels as shown on Tables 9-3, 9-4 and 9-5 of Appendix H.

³Exterior noise level standards for residential land use, as shown on Table 4-1 of Appendix H.

⁴Do the estimated Project operational noise source activities exceed the noise level standards? "Day" = 7:00 a.m. to 7:00 p.m.; "Eve." = 7:00 p.m. to 10:00 p.m.; "Night" = 10:00 p.m. to 7:00 a.m.

Source: (Urban Crossroads, 2020e, Table 9-6)

As shown in Table 4.7-8, Project stationary noise would not expose nearby receivers to unacceptable daytime, evening, or nighttime noise levels during Project buildout. Accordingly, implementation of the Project operation would not result in the exposure of receivers near the Project site to stationary noise levels that exceed the exterior noise level standards established in the City of Commerce Municipal Code. Impacts would be less than significant.



Noise levels that would be experienced at receiver locations when unmitigated Project-source noise is added to the ambient daytime, evening, and nighttime conditions are presented on Table 4.7-9, *Project Operational Noise Level Contributions – Daytime*, Table 4.7-10, *Project Operational Noise Level Contributions – Evening*, and Table 4.7-11, *Project Operational Noise Level Contributions – Nighttime*, respectively. As indicated on Table 4.7-9 through Table 4.7-11, the Project would not contribute an operational noise level increase during the daytime, evening, or nighttime hours. (Urban Crossroads, 2020e, p. 48) On this basis, Project operational stationary-source noise would not result in a substantial temporary/periodic, or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Noise impacts associated with long-term on-site operations would be less than significant.



Table 4.7-9 Project Operational Noise Level Contributions – Daytime

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Noise Sensitive Land Use?	Increase Criteria ⁷	Increase Criteria Exceeded? ⁷
R1	41.6	L1	67.3	67.3	0.0	Yes	1.5	No
R2	40.2	L2	82.8	82.8	0.0	No	3.0	No
R3	39.7	L3	62.8	62.8	0.0	Yes	3.0	No
R4	41.5	L4	74.3	74.3	0.0	Yes	1.5	No

¹See Exhibit 8-A of Appendix H for the receiver locations.

²Total Project daytime operational noise levels as shown on Table 9-3 of Appendix H.

³Reference noise level measurement locations as shown on Exhibit 5-A of Appendix H.

⁴Observed daytime ambient noise levels as shown on Table 5-1 of Appendix H.

⁵Represents the combined ambient conditions plus the Project activities.

⁶The noise level increase expected with the addition of the proposed Project activities.

⁷Significance increase criteria as shown on Table 4-1 of Appendix H.

Source: (Urban Crossroads, 2020e, Table 9-7)

Table 4.7-10 Project Operational Noise Level Contributions – Evening

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Noise Sensitive Land Use?	Increase Criteria ⁷	Increase Criteria Exceeded? ⁷
R1	41.4	L1	65.7	65.7	0.0	Yes	1.5	No
R2	36.9	L2	80.6	80.6	0.0	No	3.0	No
R3	39.0	L3	60.5	60.5	0.0	Yes	3.0	No
R4	41.1	L4	72.0	72.0	0.0	Yes	1.5	No

¹See Exhibit 8-A of Appendix H for the receiver locations.

²Total Project daytime operational noise levels as shown on Table 9-3 of Appendix H.

³Reference noise level measurement locations as shown on Exhibit 5-A of Appendix H.

⁴Observed daytime ambient noise levels as shown on Table 5-1 of Appendix H.

⁵Represents the combined ambient conditions plus the Project activities.

⁶The noise level increase expected with the addition of the proposed Project activities.

⁷Significance increase criteria as shown on Table 4-1 of Appendix H.

Source: (Urban Crossroads, 2020e, Table 9-8)



Table 4.7-11 Project Operational Noise Level Contributions – Nighttime

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Noise Sensitive Land Use?	Increase Criteria ⁷	Increase Criteria Exceeded? ⁷
R1	41.3	L1	65.0	65.0	0.0	Yes	1.5	No
R2	36.6	L2	80.8	80.8	0.0	No	3.0	No
R3	38.4	L3	59.4	59.4	0.0	Yes	5.0	No
R4	40.5	L4	72.1	72.1	0.0	Yes	1.5	No

¹See Exhibit 8-A of Appendix H for the receiver locations.

²Total Project daytime operational noise levels as shown on Table 9-3 of Appendix H.

³Reference noise level measurement locations as shown on Exhibit 5-A of Appendix H.

⁴Observed daytime ambient noise levels as shown on Table 5-1 of Appendix H.

⁵Represents the combined ambient conditions plus the Project activities.

⁶The noise level increase expected with the addition of the proposed Project activities.

⁷Significance increase criteria as shown on Table 4-1 of Appendix H.

Source: (Urban Crossroads, 2020e, Table 9-9)



C. Operational Noise Impact Analysis – Traffic Noise

To evaluate off-site noise increases that could result from Project-related traffic, noise levels were modeled for the following scenarios:

- Existing plus Project
- Opening Year (2022)

The Existing plus Project (E+P) analysis determines the Project's traffic noise impacts under the theoretical scenario where traffic from the Project is added to existing conditions. The E+P scenario is presented to disclose direct impacts to the existing environment as required by CEQA. In the case of the Project, the estimated time period between the commencement of the Project's CEQA analysis (2020) and Project buildout (2022) is two years. During this time period, traffic conditions are not static – other projects are being constructed, the transportation network is evolving, and traffic patterns are changing. Therefore, the E+P scenario is very unlikely to materialize in real-world conditions when the Project is constructed and becomes operational.

The Opening Year (2022) analysis provides an evaluation of traffic noise conditions at the time the Project becomes operational. The Opening Year analyses are utilized to determine the Project's potential to cumulatively contribute to near-term noise impacts upon consideration of existing traffic + ambient growth + Project traffic + traffic from cumulative development projects.

Refer to EIR Subsection 4.7, *Transportation*, for information about the distribution pattern of Project-related traffic. The trip distribution for the Project was developed based on anticipated passenger car and truck travel patterns to-and-from the Project site. The traffic distribution pattern for Project-related truck trips and passenger car trips are shown in EIR Subsection 4.7 and discussed in more detail in the Project's Traffic Impact Analysis included as Appendix H to this EIR.

1. *Existing plus Project Conditions*

As summarized in Table 4.7-12, *Existing plus Project Traffic Noise Levels*, Project traffic noise would not exceed the City's applicable significance threshold of creating a community noise level increase of greater than 3 dBA CNEL or 5 dBA CNEL under E+P traffic conditions. Therefore, the Project's contribution to off-site traffic noise would not result in a substantial permanent increase in ambient noise levels and Project-related impacts would be less than significant.

2. *Opening Year Conditions*

As summarized in Table 4.7-13, *Opening Year (2022) Traffic Noise Levels*, Project traffic noise would not exceed the City's applicable significance threshold of creating a community noise level increase of greater than 3 dBA CNEL or 5 dBA CNEL under Opening Year traffic conditions. Therefore, the Project's contribution to off-site traffic noise would not result in a substantial permanent increase in ambient noise levels and Project-related impacts would be less than significant.



Table 4.7-12 Existing plus Project Traffic Noise Levels

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ²			Noise-Sensitive Land Use?	Incremental Noise Level Increase Threshold ³	
				No Project	With Project	Project Addition		Limit	Exceeded?
1	Ralph Lieberman Av.	n/o Sheila St.	CM	68.8	68.8	0.0	No	5.0	No
2	Ralph Lieberman Av.	s/o Sheila St.	CM/I	71.3	71.6	0.2	No	3.0	No
3	Ralph Lieberman Av.	s/o Dwy. 2	CM	71.3	71.6	0.2	No	3.0	No
4	Sheila St.	w/o Dwy. 1	CM/I	71.3	71.6	0.3	No	3.0	No
5	Sheila St.	e/o Dwy. 1	CM/I	71.3	71.6	0.3	No	3.0	No
6	Sheila St.	e/o Ralph Lieberman Av.	CM/I	68.9	69.3	0.4	No	5.0	No
7	Sheila St.	e/o Dwy. 3	CM/I	68.9	68.9	0.0	No	5.0	No

¹City of Commerce General Plan Land Use Map.

²The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

³Does the Project create an incremental noise level increase exceeding the significance criteria?

Source: (Urban Crossroads, 2020e, Table 7-5)

Table 4.7-13 Opening Year (2022) Traffic Noise Levels

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ²			Noise-Sensitive Land Use?	Incremental Noise Level Increase Threshold ³	
				No Project	With Project	Project Addition		Limit	Exceeded?
1	Ralph Lieberman Av.	n/o Sheila St.	CM	68.9	68.9	0.0	No	5.0	No
2	Ralph Lieberman Av.	s/o Sheila St.	CM/I	71.7	71.9	0.2	No	3.0	No
3	Ralph Lieberman Av.	s/o Dwy. 2	CM	71.7	71.9	0.2	No	3.0	No
4	Sheila St.	w/o Dwy. 1	CM/I	71.7	72.0	0.3	No	3.0	No
5	Sheila St.	e/o Dwy. 1	CM/I	71.7	71.9	0.2	No	3.0	No
6	Sheila St.	e/o Ralph Lieberman Av.	CM/I	69.4	69.7	0.4	No	5.0	No
7	Sheila St.	e/o Dwy. 3	CM/I	69.4	69.4	0.0	No	5.0	No

¹City of Commerce General Plan Land Use Map.

²The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

³Does the Project create an incremental noise level increase exceeding the significance criteria?

Source: (Urban Crossroads, 2020e, Table 7-8)



Threshold b: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

For purposes of this EIR, the metric used to evaluate whether the Project's vibration levels are considered "excessive" during either construction or operation is adapted from FTA, Transit Noise and Vibration Impact Assessment Manual. Accordingly, the FTA criterion of 78 VdB is used to assess impacts due to groundborne vibration.

A. Construction Analysis

Construction activities on the Project site would utilize construction equipment that has the potential to generate vibration. Vibration resulting from construction activities on the Project site were calculated at the same four receiver locations that were evaluated in the construction noise analysis (refer to Figure 4.7-2). Table 4.7-14, *Project Construction Vibration Levels*, summarizes Project construction vibration levels at the modeled receiver locations and the significance of the vibration levels using the FTA vibration level significance threshold of 78 VdB.

Table 4.7-14 Project Construction Vibration Levels

Receiver Location ¹	Distance to Construction Activity (Feet)	Receiver Vibration Levels (VdB) ²					Threshold VdB ³	Threshold Exceeded? ⁴
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Levels		
R1	728'	14.1	35.1	42.1	43.1	43.1	78	No
R2	74'	43.9	64.9	71.9	72.9	72.9	78	No
R3	540'	18.0	39.0	46.0	47.0	47.0	78	No
R4	457'	20.1	41.1	48.1	49.1	49.1	78	No

¹Noise receiver locations are shown on Exhibit 8-A of Appendix H.

²Based on the Vibration Source Levels of Construction Equipment included on Table 6-7 of Appendix H.

³Source: FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria.

⁴Does the vibration level exceed the maximum acceptable vibration threshold?

Source: (Urban Crossroads, 2020e, Table 10-4)

As shown in Table 4.7-14, all receiver locations in the vicinity of the Project site would be exposed to vibration levels that fall far below the applicable significance threshold (i.e., 78 VdB). Accordingly, Project construction would not generate temporary, excessive groundborne vibration or noise levels and a less than significant impact would occur.

B. Operational Analysis

Under long-term conditions, the operational activities of the Project would not include or require equipment, facilities, or activities that would result in perceptible ground-borne vibration. Trucks would travel to and from the Project site on surrounding roadways; however, vibration and groundborne noise levels for heavy trucks operating at the posted speed limits on smooth, paved



surfaces – as is expected on the Project site and surrounding roadways – rarely exceed 70 VdB, which is 8 VdB lower than the applicable significance threshold (78 VdB) (Urban Crossroads, 2020e, p. 48). Accordingly, Project operation would not generate excessive groundborne vibration or groundborne noise levels and impacts would be less than significant.

4.7.7 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site. The analysis of potential cumulative impacts is divided into four general topics of discussion by combining the Thresholds of Significance (listed above in Subsection 4.7.5) into groupings of similar topics.

A. Substantial Noise Increase or Violations (Threshold a)

1. *Short-Term Cumulative Construction-Noise Impacts*

Construction activities associated with the Project, especially activities involving heavy equipment, would create intermittent periods of noise when construction equipment is in operation and cause a short-term increase in ambient noise levels. The peak noise level anticipated during construction activities are estimated to reach a maximum noise level of 73.4 dBA Leq at receiver R2 (represents the existing commerce corner commercial center located approximately 74 feet north of the Project site) which does not exceed the construction noise threshold of 80 dBA Leq. Therefore, Project construction-related activities would result in less than significant noise impacts. A search of nearby projects in a half mile radius around the Project site has been conducted and there are no known nearby construction projects that would occur at the same time as the Project construction. Because the Project's construction noise levels would be less than significant and construction noise would be temporary in nature, in addition to the fact that the Project and other cumulative projects would be required to comply with applicable noise standards to reduce potential construction-related noise level impacts, Project construction activities combined with foreseeable construction noise from nearby development would result in a less than cumulatively considerable increase in ambient noise levels in the Project study area.

2. *Long-Term Cumulative Traffic-Related Noise Impacts*

The traffic-related noise analysis contained in the Noise Impact Analysis for Opening Year (2022) was based upon the Project's Traffic Impact Analysis (Appendix H of this EIR) which considers impacts based on the addition of cumulative development projects as well as ambient growth. As previously shown in Table 4.7-13, the Project's traffic-related noise impacts to all seven study area roadway segments would be less than significant under the future Opening Year 2022 conditions. Therefore, the Project's traffic-related noise impacts along study area roadway segments (seven total) would be less than cumulatively considerable under Existing (2020) and Opening Year 2022 conditions.



3. Long-Term Cumulative Stationary Noise Impacts

As previously shown in Table 4.7-8, the proposed Project would not result in an increase in the cumulative noise levels at sensitive receiver locations. Thus, the Project's operational activities would not contribute to the creation of a significant long-term increase in noise levels above the ambient conditions and would not cause or contribute to the exposure of sensitive receptors to noise levels in excess of applicable standards. Furthermore, as shown on Figure 4.7-2, there are no cumulative development projects located in the vicinity of the sensitive receivers (R1 through R4) that could generate new stationary noise impacts which (when combined with stationary noise generated by operation of the Project) could result in cumulatively considerable noise impacts. Accordingly, the Project would have less than significant direct and cumulative stationary operational noise impacts.

B. Groundborne Vibration and Groundborne Noise (Threshold b)

The types of construction equipment that would be used to implement the proposed Project would not create vibration amplitudes that could cause structural damage to nearby structures. The nearest existing off-site structures would not be exposed to substantial ground-borne vibration due to the temporary operation of heavy construction equipment on the Project site. Under long-term operating conditions, the Project would not involve the use of equipment, facilities, or activities that would result in perceptible groundborne vibration. Therefore, the Project would not cumulatively contribute to other development projects in the vicinity of the proposed Project. Additionally, the proposed Project as well as other cumulative projects would be required to comply with applicable noise standards to reduce potential ground-borne vibration and ground-borne noise impacts. Accordingly, groundborne vibration and noise impacts would be less than cumulatively considerable.

4.7.8 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less than Significant Impact. Noise generated by Project construction activities would result in a less than significant increase in ambient noise levels. During long-term operation of the Project, the Project would not expose persons to or generate noise levels in excess of local standards and would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Additionally, under long-term operation, Project-related traffic would not expose persons to or generate noise levels in excess of local standards and would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Accordingly, the Project's long-term noise impacts would be less than significant.

Threshold b: Less than Significant Impact. The Project's construction and operational activities would not result in a perceptible groundborne vibration or noise.



4.7.9 MITIGATION

Impacts would be less than significant; therefore, no mitigation is required.

4.7.10 SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant; therefore, mitigation is not required.



4.8 TRANSPORTATION

The following analysis is based primarily on a technical traffic study prepared by Urban Crossroads, titled “5200 Sheila Street Focused Traffic Assessment” dated October 6, 2020. This Traffic Impact Analysis (TIA) is included as Appendix I1 to this EIR; and a Vehicle Miles Travelled Assessment dated April 1, 2020 and included as Appendix I2 to this EIR. Other information sources referenced to prepare this Subsection included the City of Commerce General Plan (City of Commerce, 2008), the City of Commerce General Plan EIR (City of Commerce, 2006), and the Los Angeles County Metropolitan Transportation Authority’s Congestion Management Program (CMP) (LACMTA, 2010). Refer to Section 7.0 for a complete list of references.

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which requires all lead agencies to adopt vehicle miles traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. The Office of Planning and Research (OPR) published an updated Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018, which provided guidance in evaluating transportation impacts based on VMT. VMT is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1) number of daily trips and (2) the average trip length ($VMT = \text{daily trips} \times \text{average trip length}$). The Technical Advisory provides details on appropriate “screening thresholds” that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. Screening criteria is broken into the following three types: 1) Screening Thresholds for Small Projects; 2) Map-Based Screening for Residential and Office Projects; and 3) Projects within a Transit Priority Area.

A. Study Area Description

The Project site is located in the southwestern portion of the City of Commerce and is abutted by Sheila Street and Ralph Lieberman Avenue. The Long Beach Freeway (I-710) is located approximately 0.32 miles west of the Project site, and the Interstate 5 Freeway (I-5) is located approximately 0.75 miles southwest of the Project site. Approximately 615 feet to the west of the Project site begins the perimeter of the Burlington Northern Santa Fe Los Angeles Intermodal Facility (BNSF) and the Union Pacific Railroad Commerce Railyard (UP) is located approximately 0.57 miles to the northwest of the Project site.

Currently, vehicular access to the Project site is from a 20-foot gated access driveway that abuts the northern portions of the Project site located on Sheila Street, near the intersection of Sheila Street and Ralph Lieberman Avenue. A second entryway, which operates in accordance with a recorded easement, is located at the northeastern corner of the Project site off of Sheila Street. Sidewalks are present along both sides of Sheila Street and Ralph Lieberman Avenue.



4.8.1 EXISTING CONDITIONS

There are approximately 210 employees on site and the primary hours of operation are Monday through Friday from 8:00 a.m. to 5:00 p.m. As depicted on Table 4.8-1, *Existing Trip Generation*, the existing use currently generates 332 daily passenger car trips and 14 daily truck trips, totaling 346 total daily trips with 50 a.m. peak hour trips and 34 p.m. peak hour trips. The existing uses are part of the existing baseline and will therefore be factored into the analysis of the proposed Project.

Table 4.8-1 Existing Trip Generation

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Existing Use							
Passenger Cars:	46	1	47	2	32	34	332
Truck Trips:							
2-axle	1	2	3	0	0	0	14
3-axle	0	0	0	0	0	0	
4+ axle	0	0	0	0	0	0	
- Truck Trips (Actual Vehicles)	1	2	3	0	0	0	14
Total Trips (Actual Vehicles)¹	47	3	50	2	32	34	346

¹ Total Trips = Passenger Cars + Truck Trips

(Urban Crossroads, 2020f, Table 2)

A. Existing Circulation Network

1. City of Commerce

The City of Commerce General Plan Circulation Network is outlined in the City of Commerce General Plan § 4.5 (City of Commerce, 2008). The Project, located in the Commerce Park Planning Area, indicates the possible need for localized roadway and/or intersection improvements, with emphasis on traffic flow along Eastern Avenue, Slauson Avenue, and Garfield Avenue (City of Commerce, 2008, p. 66). The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as defined by the City of Commerce General Plan Circulation Network.

2. Los Angeles County

The City of Commerce is subject to the Los Angeles County Congestion Management Plan, or CMP, which is a state-mandated program with the passage of Assembly Bill 471 (City of Commerce, 2008, p. 65). The CMP was created to: link land use, transportation, and air quality decisions; develop a partnership among transportation decision-makers in devising appropriate transportation solutions that include all modes of travel; and, propose transportation projects that are eligible to compete for State gas tax funds. The I-5 and I-710 ramps located in the City of Commerce are CMP-designated facilities in Commerce (City of Commerce, 2008, p. 65).



4.8.2 REGULATORY FRAMEWORK

Senate Bill 743, adopted in December 2018, resulted in changes to California Environmental Quality Act (CEQA) Guidelines which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate takes effect July 1, 2020.

The OPR published an updated Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018, which provided guidance in evaluating transport impacts on VMT. The Technical Advisory provides details on appropriate screening thresholds which were used in establishing the screening threshold for the Project. Under OPR guidelines, a project that generates fewer than 110 trips per day would result in a less than significant VMT impact. The City of Commerce has no adopted threshold for determining a potentially significant level of VMT, and the analysis in this section therefore analyses the Project's VMT significance according to the OPR's Screening Thresholds for Small Projects.

4.8.3 METHODOLOGY

The Focused Traffic Assessment was prepared in accordance with the County of Los Angeles Traffic Impact Analysis Report Guidelines adopted January 1, 1997. A LOS analysis, which analyzes roadway intersection performance, was prepared for informational purposes only. This analysis is included as part of the Focused Traffic Assessment and included in Appendix I1 of this EIR. A VMT Assessment Memorandum was prepared in accordance with OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA published in December 2018 and included in Appendix I2 of this EIR.

A. Trip Generation Rates

The trip generation rates used for the analysis in this subsection is based upon information collected by the Institute of Transportation Engineers (ITE) as provided in the Trip Generation Manual (10th Edition, 2017). For purposes of analysis, the following ITE land use codes and vehicle mixes have been utilized (Urban Crossroads, 2020f, p. 5):

- ITE land use code 110 (General Light Industrial) has been used to derive site specific trip generation estimates for up to 45,959 square feet. The vehicle mix has been obtained from the ITE's Trip Generation Manual Supplement (dated February 2020). This study provides the following vehicle mix: AM Peak Hour: 97.0% passenger cars and 3.0% trucks; PM Peak Hour: 98.0% passenger cars and 2.0% trucks; Weekday Daily: 92.0% passenger cars and 8.0% trucks. The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%.
- ITE land use code 150 (Warehousing) has been used to derive site specific trip generation estimates for up to 68,939 square feet of the proposed Project. The vehicle mix has been obtained from the ITE's Trip Generation Manual Supplement (dated February 2020). This



study provides the following vehicle mix: AM Peak Hour: 87.0% passenger cars and 13.0% trucks; PM Peak Hour: 85.0% passenger cars and 15.0% trucks; Weekday Daily: 73.0% passenger cars and 27.0% trucks. The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%.

The preliminary site plan for the proposed Project is shown on Figure 3.0-1, *Site Plan*. The proposed Project consists of a single speculative 114,898 square foot warehouse and light industrial building. Because the future tenant is unknown, the trip generation rates and forecast of the vehicular trips used in this EIR are considered “conservative” and overestimates Project trips. The General Light Industrial trip rate is among the highest rates published in the ITE Trip Generation Manual for industrial and warehousing land uses. Thus, the assumption in this EIR that 40% of the building will be light industrial uses overestimates the number of trips that will be generated as compared to “real world” conditions which will likely reflect reduced trips as compared to what this EIR assumes. Several environmental analyses throughout this EIR rely on trip generation. By using a conservative trip rate selection, Project average daily trips and peak hour trips are likely overestimated and provide a conservative approach for the analyses related to air quality, greenhouse gas emissions, energy, noise, and transportation.

As shown on Table 4.8-2, *Project Trip Generation Summary*, the proposed Project is anticipated to generate a total of 352 trip-ends per day with 43 AM peak hour trips and 41 PM peak hour trips.

Table 4.8-2 Project Trip Generation Summary

Land Use	Quantity	Units ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
General Light Industrial (40%)	45.959	TSF							
Passenger Cars:			27	4	31	4	25	29	210
Truck Trips									
2-axle:			0	0	0	0	0	0	4
3-axle:			0	0	0	0	0	0	4
4+ axle:			1	0	1	0	0	0	12
- Truck Trips			1	0	1	0	0	0	20
Warehousing (60%)	68.939	TSF							
Passenger Cars:			8	2	10	3	8	11	88
Truck Trips									
2-axle:			0	0	0	0	0	0	6
3-axle:			0	0	0	0	0	0	8
4+ axle:			1	0	1	0	1	1	20
- Truck Trips			1	0	1	0	1	1	34
Total Trips (Actual Vehicles)²			37	6	43	7	34	41	352

¹ TSF = thousand square feet

² Total Trips = Passenger Cars + Truck Trips

(Urban Crossroads, 2020f, Table 4)



Based on a comparison of the proposed Project and existing use, the proposed Project is anticipated to generate 6 net new trip-ends per day with 7 fewer AM peak hour trips and 7 additional peak hour trips. It should be noted that due to the change in percentage of truck trip generation from the existing and proposed land uses, the Project would generate a net increase of 44 net new 3- and 4+ axle truck trip-ends.

The development of the proposed Project would generate fewer than 500 new trip-ends per day and fewer than 50 new peak hour trips. Based on the City's traffic study guidelines and the anticipated net new trips for the site, additional traffic analysis beyond the trip generation assessment is not necessary. However, peak hour operations analysis of the Project driveways and the intersection of Ralph Lieberman Avenue and Sheila Street has been prepared for informational purposes and is provided in the Focused Traffic Assessment and provided in Appendix I1 of this EIR (Urban Crossroads, 2020f, p. 5).

B. Screening VMT Threshold for Small Projects

Local serving projects that tend to improve the convenience of goods and services to surrounding residential areas as local serving shopping centers (typically less than 50,000 square feet), local serving K-12 schools, day care centers, local serving gas stations, local serving banks, local parks, etc. are all presumed to have a less than significant impact.

As outlined in Technical Advisory on Evaluating Transport Impacts in CEQA, published by the OPR:

[A]bsent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact.

Therefore, under OPR guidelines, a project that generates fewer than 110 trips per day would result in a less than significant VMT impact. The City of Commerce has no adopted threshold for determining a potentially significant level of VMT, and the analysis in this subsection therefore analyses the Project's VMT significance according to the OPR's Screening Thresholds for Small Projects. Because there is an absence of substantial evidence that the Project would generate a potentially significant level of VMT, the addition of 110 or fewer trips is considered a less than significant impact.

4.8.4 BASIS FOR DETERMINING SIGNIFICANCE

Section XVII of Appendix G to the CEQA Guidelines addresses typical adverse effects to transportation, and includes the following threshold questions to evaluate the Project's impacts on transportation (OPR, 2019):

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



- b. Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
- 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)?*
- d. Result in inadequate emergency access?*

As previously presented in the Project's Initial Study (Appendix A), the Project site has been designed to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes and nationally recognized fire and life safety standards of the City and Los Angeles County Fire Department. Further, during the building plan check and development review process, the City would coordinate with the Los Angeles County Fire Department to ensure that the necessary fire prevention and emergency response features are incorporated into the proposed Project, and that adequate circulation and access (e.g., adequate turning radii for fire trucks) is provided in the traffic and circulation components of the proposed Project. Accordingly, impacts have been determined to be less than significant, and analysis in this EIR section will not include threshold d).

4.8.5 IMPACT ANALYSIS

The Project is anticipated to be constructed in one phase by the year 2022. Access to the Project site will be provided on Sheila Street. All Project driveways are proposed to allow for full access (no turn restrictions) and will accommodate passenger car access, while Driveways 1 and 3 will serve heavy trucks. Trucks are anticipated to enter via Driveway 1 and circulate counterclockwise around the building and exit via Driveway 3. However, both Driveways 1 and 3 would accommodate both the ingress and egress of trucks (Urban Crossroads, 2020f, p. 1).

Employee parking areas are accessible via Driveways 1, 2, and 3. Passenger car parking spaces are also accommodated on the southwest and southeast corners of the site for truck drivers. Truck/Trailer parking is provided on the south side of the site (behind the proposed building) (Urban Crossroads, 2020f, p. 1).

Threshold a: Would the Project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project would be subject to compliance with the Transportation Element of the City of Commerce General Plan. Applicable policies pertaining to the Project contained therein are assessed in Table 4.8-3, *Transportation Policy Consistency Analysis*. As demonstrated, the Project would not conflict with the City of Commerce General Plan's Transportation Element¹, and impacts associated with conflict

¹ A number of Transportation Policies in the General Plan are not included in Table 4.8-3. Policies excluded from analysis are either not applicable to the Project and/or will not have any potential to be affected by any Project activities.



of an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant.

Table 4.8-3 Transportation Policy Consistency Analysis

Policy #	General Plan Policy Text	Project Consistency
Transportation Policy 1.1	<i>The City of Commerce will continue to implement a comprehensive plan for a coordinated street circulation system that will provide for the safe and efficient movement of people and goods.</i>	Consistent. The Project would generate six additional trip ends per day and would therefore have minimal effect on the existing street circulation system.
Transportation Policy 1.4	<i>The City of Commerce will implement the applicable standards for local roadways specifically serving industrial developments in the city.</i>	Consistent. As a standard condition of approval, the Project would be compliant with all applicable provisions in the City of Commerce Municipal Code, including Section 19.11 (relating to Manufacturing Zones) and Title 10 (relating to Vehicles, Traffic, and Parking)
Transportation Policy 1.6	<i>The City of Commerce will continue to support the operation of, and further the enhancement of, a safe and efficient regional and inter-city transit system.</i>	Consistent. See response to Transportation Policy 1.1. Furthermore, trucks entering or exiting the Project site would be required to travel on designated truck routes.
Transportation Policy 1.8	<i>The City of Commerce will continue to analyze traffic congestion and evaluate strategies to improve the efficiency of the city transportation and circulation system.</i>	Consistent. See response to Transportation Policy 1.1, above.
Transportation Policy 2.1	<i>The City of Commerce will evaluate plans that will promote the separation of commercial and industrial development traffic from residential neighborhoods.</i>	Consistent. The Project site is zoned as Light Manufacturing which would permit the Project's foreseeable warehouse uses. Industrial development traffic associated with the Project would utilize designated truck routes to access the nearby I-710 and I-5 Freeways and would not route through residential neighborhoods.
Transportation Policy 2.2	<i>The City of Commerce will prohibit truck traffic from using local streets located within, and exclusively serving, the residential neighborhoods.</i>	Consistent. Industrial development traffic associated with the Project would utilize designated truck routes to access the nearby I-710 and I-5 Freeways and would not route through residential neighborhoods.
Transportation Policy 2.3	<i>The City of Commerce will establish truck routes in the city</i>	Consistent. The Project would comply with all City designated truck routes.



Policy #	General Plan Policy Text	Project Consistency
Transportation Policy 2.4	<i>The City of Commerce will seek out means to assess heavy truck users for the cost of maintaining road way related infrastructure.</i>	Consistent. The proposed project would generate a net increase of 44 net new 3- and 4+ axle truck trip-ends and the Project Applicant will pay all applicable fees.
Transportation Policy 3.1	<i>The City of Commerce will continue to encourage the use of alternate transportation modes (e.g., shuttles, etc.).</i>	Consistent. The Project would promote the use of alternate transport modes. Future potential employees would have the option to utilize existing City of Commerce Municipal Bus Lines. The nearest bus stop is located at the intersection of Sheila Street and Ralph Lieberman Avenue (served by the 26th St. Shuttle), which is located north of and adjacent to the Project site. Furthermore, the Project would provide bike racks at the northeast and northwest corners of the Project building.
Transportation Policy 3.5	<i>The City of Commerce will encourage the maintenance and improvement of “pedestrian-safe” oriented facilities to ensure safe pedestrian movement.</i>	Consistent. As discussed in the analysis for threshold c), the Project would provide adequate visibility for vehicular and pedestrian traffic..
Transportation Policy 4.4	<i>The City of Commerce will evaluate the feasibility of levying license fees for all trucks using city roads to pay for the cost of associated road repairs.</i>	Consistent. See response to Transportation Policy 2.4, above.
Transportation Policy 5.1	<i>The City of Commerce will ensure that adequate off-street parking and loading facilities are provided for businesses and residences in the city.</i>	Consistent. The Project will provide a total of 116 auto parking stalls which includes 18 truck parking stalls. Parking stalls have been designed to be compliant to City of Commerce Municipal Code Section 19.21.040 which regulates numbers of required parking spaces.
Transportation Policy 5.3	<i>The City of Commerce will require all new developments to provide on-site parking in compliance with existing zoning regulations.</i>	Consistent. See response to Transportation Policy 5.1, above.

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

On September 27, 2013, SB 743 was signed into law, which eliminated evaluation of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for



determining significant impacts in California. As part of the updated CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099(b)(1)). On January 20, 2016, OPR released revisions to its proposed CEQA guidelines for the implementation of SB 743. Final review and rulemaking for the new guidelines were completed in December 28, 2018 when the California Natural Resource Agency certified and adopted the CEQA Guidelines update package, including guidelines section implementing SB 743. The Guidelines became mandatory on July 1, 2020. As stated, a project that generates fewer than 110 trips per day would result in a less than significant VMT impact.

The proposed Project is anticipated to generate a total of 352 daily trips. The Project site’s existing conditions currently generate 346 daily trips. Therefore, the proposed Project is anticipated to result in a net increase of 6 trips per day as compared to the existing use (Urban Crossroads, 2020g, p. 2). As the Project is anticipated to generate a nominal change in daily trip generation, the net change in trips would be consistent with OPR’s small projects screening threshold of 110 daily vehicle trips and would therefore result in a less than significant impact.

Threshold 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)?

The Project’s potential to increase hazards as a result of a geometric design feature has been assessed to provide adequate truck access/circulation and sight distances at Project driveways. The Project’s circulation plan has been designed to be compatible with all foreseeable vehicles.

1. Truck Access and Circulation

As depicted on Figure 3.0-3, *Circulation*, a truck turning template has been overlaid on the site plan at each applicable Project driveway anticipated to be utilized by heavy trucks in order to determine appropriate curb radii and to verify that trucks will have sufficient space to execute turning maneuvers. Trucks entering the Project side would only be permitted to enter the Project site at the access point in the northwest corner near the edge of the property line on Sheila Street. Truck traffic would follow the perimeter of the proposed building, and egress from the access point located at the northeast corner of the Project site. The Project would accommodate the wide turning radius of heavy trucks (WB-67, 53-foot trailer) as currently designed. Accordingly, impacts due to hazards of sharp or dangerous intersections with respect to truck access and circulation are less than significant.

2. Sight Distance Assessment

Horizontal sight distance has been evaluated for all Project driveways along Sheila Street and Ralph Lieberman Avenue based on A Policy on Geometric Design of highway and Streets (American Association of State highway and Transportation Officials). Intersection sight distance is the continuous length of highway ahead visible to the driver. Drivers waiting to turn must have adequate visibility of other objects and vehicles.



At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. For the purposes of this analysis, a 7 ½ second criterion has been applied to the outside travel lanes in either direction to provide the most conservative sight distance. The 7 ½ second criterion allows waiting vehicles to either cross all lanes of through traffic by turning left or cross the near lanes by turning right without requiring through traffic to radically alter their speed.

As shown on *Figure 3-1*, the Project has been designed to provide adequate visibility for vehicular and pedestrian traffic at each Project driveway by limiting sight obstructions within the limited use area. Any landscaping/hardscape within the limited use area would not exceed 30-inches (2.5-feet) in height. The limited use area would be kept clear of any landscaping or any other obstructions that may impede the visibility of the driver, including on-street parking. Minimum horizontal sight distances should be re-evaluated in the field once the driveway has been constructed. Additionally, the requirements for site visibility have been noted on the site plan and will be a condition of approval for the Project.

Based on a speed limit of 35 miles per hour, the minimum 390-foot sight distance can be accommodated at all Project driveways. Accordingly, impacts are less than significant and no mitigation is necessary.

4.8.6 CUMULATIVE IMPACT ANALYSIS

The proposed Project would result in a less than significant impact to transportation. As discussed above, the proposed Project would be consistent with relevant plans, ordinances, and policies. Further, the proposed Project does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. Cumulative projects would be expected to comply with all applicable relevant plans, ordinances, and policies. Therefore, no cumulative impact would occur.

Similar to the proposed Project, cumulative projects would be required to analyze and mitigate their respective project's impacts relating to VMT. The proposed Project falls under the VMT impact thresholds and would align with State and regional long-term VMT and GHG reduction goals. Therefore, the proposed Project would not contribute to a cumulative VMT impact. Therefore, the proposed Project's VMT would not be cumulatively considerable.

4.8.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less Than Significant. The proposed Project would be consistent with all applicable policies identified in the City of Commerce General Plan. Accordingly, impacts would be less than significant.

Threshold b: Less than Significant. The proposed Project is anticipated to result in an increase of 6 trips per day as compared to the existing use. As the Project is anticipated to generate a nominal change in daily trip generations as compared to the existing use, the net change in trips would be consistent



with OPR's small projects screening threshold of 110 daily vehicle trips and would therefore be result in a less than significant impact.

Threshold c: Less than significant. The Project intersections have been assessed for truck and auto access and circulation and do not pose a hazard due to a geometric design feature or incompatible uses. Accordingly, impacts would be less than significant.

4.8.8 MITIGATION

Impacts would be less than significant; therefore, mitigation is not required.

4.8.9 SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.



4.9 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection is based on a site-specific cultural resources assessment report titled “*Paleontological Assessment for the Commerce Logistics Center Project*” (the Paleontological Resources Study) (dated December 13, 2019) and a cultural resources assessment report titled “*Cultural Resources Study for the Commerce Logistics Center*” (the Cultural Resources Study) (dated December 13, 2019). The reports were prepared by Brain F Smith and Associates, Inc (BFSA) and are included as Appendix E and Appendix C, respectively.

The following analysis of potential tribal cultural resources pertaining to the Project site is based primarily on the Cultural Resources Study performed by BFSA. All references used in this Subsection are included in EIR Section 7.0, *References*. Written and oral communication between Native American tribes and the Lead Agency is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Section, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.9.1 EXISTING CONDITIONS

A. Cultural Setting

The information provided below is a summary of the Existing Conditions information provided in Subsection 4.2, *Cultural Resources* of this EIR. Please refer to Section 4.2.1 for a detailed discussion of the Project’s prehistoric and historic setting.

1. *Prehistoric Period Setting*

The Project site is located within the eastern portion of the City of Commerce within Los Angeles County, California. According to the earliest available ethnographic data, the Gabrielino (Tongva) were the major tribe established in the Project area as of the late Holocene period (circa 3,000 YBP). Gabrielino territory included the watersheds of the San Gabriel, Santa Ana, and Los Angeles rivers, portions of the Santa Monica and Santa Ana mountains, the Los Angeles basin, the coast from Aliso Creek to Topanga Creek, and San Clemente, San Nicolas, and Santa Catalina islands (Moratto 1984). The Gabrielino spoke a Cupan language that was part of the Shoshonean or Takic family of Uto-Aztecan linguistic stock; these linguistic ties united a disperse ethnic group occupying 1,500 square miles in the Los Angeles basin region. (BFSA, 2019a, p. 1.0-6)

Gabrielino were hunters and gatherers whose food sources included acorns, seeds, marine mollusks, fish, and mammals; archaeological sites support this data, with evidence of hunting, gathering, processing, and storage implements including arrow points, fishhooks, scrapers, grinding stones, and basketry awls. Santa Catalina Island provided a valuable source of steatite for the Gabrielino, which they quarried and traded to other groups. About 50 to 100 permanent villages are estimated to have been in existence at the time of European contact, most of which were located along lowland rivers



and streams and along sheltered areas of the coast. Village sites contained varying types of structures, including houses, sweathouses, and ceremonial huts. Artistic items included shells set in asphaltum, carvings, painting, steatite, and baskets. Settlements were often located at the intersection of two or more ecozones, thus increasing the variety of resources that were immediately accessible. Offshore fishing and hunting were accomplished with the use of plank boats, while shellfish and birds were collected along the coast. At the time of European contact, the Gabrielino, second only to the Chumash, were the wealthiest, most populous, and most powerful ethnic group in southern California. (BFSA, 2019a, p. 1.0-6)

As with other Native American populations in southern California, the arrival of the Spanish drastically changed life for the Gabrielino. Incorporation into the mission system disrupted their culture and changed their subsistence practices. Ranchos were established throughout the area, often in major drainages where Native American villages tended to be located. By the early 1800s, Mission San Gabriel had expanded its holdings for grazing to include much of the former Gabrielino territory. Eventually, widespread relocation of Native American groups occurred, resulting in further disruption of the native lifeways. With the introduction of Euro-American diseases, the Gabrielino and other groups of southern California experienced drastic population declines. In the early 1860s, a smallpox epidemic nearly wiped out the remaining Gabrielino population. While people of Gabrielino descent still live in the Los Angeles area, the Gabrielino were no longer listed as a culturally identifiable group in the 1900 Federal Census. (BFSA, 2019a, p. 1.0-6)

Refer to EIR Subsection 4.2.1 and the Cultural Resources Study (Appendix C) for a more detailed discussion about the prehistoric cultural periods in the Project area.

4.9.2 REGULATORY FRAMEWORK

A. California Public Resources Code

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural resources are recognized as a non-renewable resource and therefore receive protection under the California Public Resources Code and CEQA.

California Public Resources Code 5097.9–5097.991 provides protection to Native American historical and cultural resources, and sacred sites and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

California Public Resources Code 5097.9 states that no public agency or private party on public property shall “interfere with the free expression or exercise of Native American Religion.” The code further states that “No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine... except



on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres.”

B. California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code Section 7050.5, which states that “In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation...until the coroner...has determined...that the remains are not subject to...provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible.... The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and...has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.”

C. California Register of Historical Resources

The California Register of Historic Resources is the state version of the National Register of Historic Resources program (see also Section 4.3, *Cultural Resources*). It was enacted in 1992 and became official January 1, 1993. The California Register was established to serve as an authoritative guide to the state’s significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of Public Resources Code Section 5024.1, a resource may be listed as a historical resource in the California Register if it meets any of the four National Register criteria.

D. Assembly Bill 52

The Native American Historic Resource Protection Act (Assembly Bill 52 or AB 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCRs) into the CEQA process. Under AB 52, a tribal cultural resource is defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. Or the lead agency, supported by substantial evidence, chooses at its discretion to treat the resource as a tribal cultural resource.

AB 52 requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. AB 52 requires consultation with tribes at an early stage to determine whether the project would have an adverse impact on a TCR and define mitigation to protect them. Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested in writing to be notified. The tribe then has 30 days of receiving the notification to respond if it wishes to engage in consultation. The lead agency must initiate consultation within 30 days of



receiving the request from the tribe. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a TCR, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCR's and discuss feasible alternatives or mitigation that avoid or lessen the impact.

4.9.3 METHODOLOGY

BFSA performed an investigation of the Project site which included a review of an archaeological records search performed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton in order to determine the presence of historical and archeological resources (Appendix C). Furthermore, a review of the Sacred Lands Files (SLFs) by the Native American Heritage Commission (NAHC) was performed. The NAHC SLF search did not indicated the presence of a sacred site within the search radius.

In accordance with the provisions of AB 52, the City sent formal notification letters to Tribes on August 10, 2020. The letter included a brief description of the Project and its location and Tribes were asked to convey any knowledge regarding prehistoric or Native American resources (archaeological sites, sacred lands, or artifacts) located within the study area or surrounding vicinity. The 30-day noticing requirement under AB 52 was completed September 8, 2020. The City received a response from one of the tribes (Gabrieleno-Kizh Nation) requesting consultation. Tribes contacted for purposes of the Native American consultation are provided below.

4.9.4 BASIS FOR DETERMINING SIGNIFICANCE

According to Section XVII of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to tribal resources if the Project or any Project-related component would (OPR, 2019):

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



The significance thresholds above were used to evaluate the significance of the proposed Project's impacts to tribal cultural resources.

4.9.5 IMPACT ANALYSIS

Threshold 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: (1) 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 (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

The Project site is currently developed with two structures: one cafeteria building and one office building. The property was previously impacted by the development of the structures, and associated hardscape, as well as the general development of the area over the past 100 years. As documented in Section 4.2, *Cultural Resources* of this EIR, the existing buildings are not considered historical resources, and there are no known prehistoric cultural resources present on the Project site (BFSA, 2019a, p. 3.0-45). Furthermore, no sites, features, places, or landscapes were identified that are either listed or eligible for listing the California Register of Historic Places (CRHR).

A. Sacred Lands File Search Results

A Sacred Lands File search was conducted by NAHC to determine if any sacred lands or traditional cultural properties had been identified on or near the Project site. This search was requested by BFSA; a review of the records search provided by the SCCIC indicated that no previously recorded resources are located within the subject property. The NAHC SLF search did not indicate the presence of a sacred site within the search.

B. AB 52 Consultation Results

Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the lead agency (in this case, the City of Commerce) during the project planning process to identify and protect TCRs.



The provisions of CEQA, Public Resources Code Sections 21080.3.1 et seq. (also known as AB 52), requires meaningful consultation with California Native American Tribes on potential impacts to TCRs, as defined in Public Resources Code Section 21074. As part of the AB 52 process, Native American tribes must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide formal written notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c). In accordance with the provisions of AB 52, the City sent formal notification letters on, August 10, 2020, to the following tribes:

- Soboba Band of Luiseño Indians; and
- Gabrieleno Band of Mission Indians – Kizh Nation.

The letter included a brief description of the Project and its location. The 30-day noticing requirement under AB 52 was completed September 8, 2020. The City received a response from one of the tribes (Gabrieleno-Kizh Nation) requesting consultation. The City scheduled an appointment for consultation with the Tribe on October 21, 2020.

A review of the records search provided by the SCCIC indicated that no previously recorded resources are located within the subject property. However, because the Project would require excavation for construction into previously undisturbed soils, there is a potential to uncover undiscovered prehistoric artifacts or tribal cultural resources during excavations. Therefore, while unlikely, the presence of subsurface tribal cultural resources on the Project Site remains possible, and these could be affected by ground-disturbing activities associated with grading and construction at the Project Site.

4.9.6 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site that have a potential for uncovering tribal cultural resources as defined by Public Resources Code 21074. Impacts relating to tribal cultural resources impacts are site-specific and addressed on a site-by-site basis. Therefore, while there is a potential for an impact on a specific site, the impact would not ordinarily extend beyond the site or immediately surrounding area. There could be circumstances in which a tribal cultural resource extends over more than one property, but in that event, there could be a cumulative effect only if all affected properties were in the process of being developed and physical alterations to the ground were proposed in all of those projects. There are no adjacent related projects that could



potentially result in affects to unknown tribal cultural resources that may lie in the subsurface of the Project site; therefore, there would be no cumulative impacts affecting tribal cultural resource.

4.9.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Significant Impact. Although no tribal cultural resources are known to occur within the Project's impact limits, implementation of the Project has the potential to uncovered previously undiscovered tribal cultural resources buried underneath the site's surface.

4.9.8 MITIGATION

MM 4.9-1 Prior to the issuance of a grading permit, the applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with the City during the AB 52 process. The applicant shall coordinate with the Tribe(s) to develop a Tribal Monitoring Agreement(s). A copy of the agreement shall be provided to the City of Commerce Planning Department prior to the issuance of a grading permit.

If a significant tribal cultural resource is discovered on the property, ground disturbing activities shall be suspended 50 feet around the resource(s). A representative of the appropriate Native American Tribe(s), the Project Applicant, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented to protect the identified tribal cultural resources from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resources(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the tribal cultural resources in accordance with current professional archeology standards. The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery and shall require that all recovered artifacts undergo basic field analysis and documentation or laboratory analysis, whichever is appropriate. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered tribal cultural resources shall be processed and curated according to current professional repository standards. The collection and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the City of Commerce. A final report containing the significance and treatment findings shall be prepared by the archeologist and submitted to the Commerce Planning Department and the appropriate Native American Tribe.

4.9.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Less than significant.



5.0 OTHER CEQA CONSIDERATIONS

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

The Project would not result in any significant and unavoidable impacts on the environment. All the Project's potentially significant impacts incorporate mitigation measures that reduce the Project's impacts to a less than significant level.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROJECT SHOULD IT BE IMPLEMENTED

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved with the proposed action should it be implemented (CEQA Guidelines §15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the Project could result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. There are no non-renewable resources present at the Project site; therefore, conversion of the land from its current state, developed with two office buildings, would have no direct effect on any such resources at the Project site.

Natural resources in the form of construction materials and energy resources would be used in the construction of the Project, but the redevelopment of the Project site as proposed would have no measurable effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the Project would not involve the use of large sums or sources of renewable energy. Additionally, the Project is required by law to comply with the City of Commerce Green Building Code, compliance with which reduces a building operation's energy volume that is produced by fossil fuels. A more detailed discussion of energy consumption is provided in this EIR's Subsection 4.3, *Energy*.

On-site activities would include but not be limited to warehousing and distribution/storage of materials and products, along with ancillary office spaces. Non-renewable natural resources that would be consumed over the operating life of the Project could include fuels (petroleum and natural gas) for both on-site workers who would commute to the Project site and for the commercial vehicles that would deliver goods to/from the Project site. Depending on the specific occupants of the proposed Project's future buildings, various non-renewable natural resources could be consumed during operations, including metals (such as lead, copper etcetera). There also could be a variety of ancillary maintenance



and fueling activities for equipment used inside the future buildings and in the truck loading areas. These activities could involve the consumption of liquid fuels such as gasoline and diesel, propane, or other gases. The consumption of non-renewable resources to construct and operate the Project over the long-term would likely commit subsequent generations to the same use of the land and similar patterns of energy consumption. However, the Project is not expected to reduce the availability of any natural resources associated with long-term operational activities.

EIR Subsection 4.5, *Hazards and Hazardous Materials*, provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage to the environment. As concluded in the analysis, compliance with federal, State, and local regulations related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all occupants that occupy the Project's building. As such, construction and long-term operation of the Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

As demonstrated in the analysis presented throughout EIR Section 4.0, implementation of the Project would not result in significant and unavoidable environmental effects that cannot be feasibly reduced to below levels of significance (refer to EIR Subsection 5.1).

The Project site is in a portion of the City that is surrounded by uses that are compatible with the industrial use proposed by Project Applicant. Specifically, land located to the north contains a commercial shopping center. The land east of the Project site includes industrial buildings and a commercial shopping strip along East Washington Avenue. To the south of the Project site are industrial buildings. To the west of the Project site are office buildings, I-710, industrial warehouse buildings, and Burlington Northern Santa Fe (BNSF) railroad. Use of the Project site as a warehouse facility is compatible with surrounding development and the Project would not create any primary or secondary effects that would preclude the use of surrounding properties for their existing and intended uses.

5.3 GROWTH-INDUCING IMPACTS OF THE PROJECT

CEQA requires a discussion of how the Project could be growth-inducing. The CEQA Guidelines identify a project as growth-inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines §15126.2(d)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area, placing additional demands on public services and infrastructure systems, and in the generation of a variety of environmental impacts, which are addressed throughout Section 4.0, *Environmental Analysis*, of this EIR.



A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environs where population growth results in increased demand for service and commodity markets responding to the new population of residents or employees. The Project's construction-related and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs is expected to be marginal, accommodated by existing goods and service providers, and would not result in any new physical impacts to the environment based on the amount of available commercial and retail services available in areas near the Project site, including the cities of East Los Angeles, Montebello, Bell Gardens, and Pico Rivera. In addition, the Project would create jobs consistent with growth projections for the City and would serve the housing units either already built or planned for development within Los Angeles County and/or the City of Commerce. Accordingly, the on-site employment generation would not induce substantial growth in the area.

The City's General Plan land use designation for the Project site is Industrial. The land adjacent to the Project site to the south, east, and west have the same General Plan land use designation of Industrial. The land adjacent to the Project site to the north has a land use designation of Commercial Manufacturing. The land north of the Project site, opposite of Sheila Street, is developed with a commercial plaza that has several buildings consisting of several individual commercial businesses and restaurants. Industrial buildings surround the Project site to the south, east, and west, which include warehousing and a truck trailer storage facility. The Project is limited to the Project site's boundaries and does not include any components that would indirectly affect existing or planned uses on neighboring properties. Accordingly, the Project would not induce growth in the Project area. The development of the proposed Project would not reasonably or foreseeably cause the redevelopment of other properties or cause development on other properties.

Furthermore, the Project's potential influence on other nearby properties to redevelop at greater intensities and/or different uses than the City's General Plan and Zoning Code allow is speculative beyond the rule of reason. CEQA does not require the analysis of speculative effects (CEQA Guidelines §151454). If any other property owner were to propose development or redevelopment of a property in the Project vicinity or any part of the City, the project would require evaluation under CEQA based on its own merits, including an analysis of direct and cumulatively considerable effects.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as SCAG. Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated



that the potential growth significantly affects the environment in some other way. The Project would be consistent with the existing General Plan land use designation (Industrial) and Zoning classification (Heavy Industrial) for the Project site.

The operation and maintenance of the Project would generate several jobs, but any potential growth-inducing impact of the employment of persons at the Project site was accounted for in the City's General Plan, as the Project would develop the Project site in compliance with the City's General Plan Land Use designation. Accordingly, the proposed Project would not directly promote growth either at the Project site or at the adjacent and surrounding properties that were not accounted for in the City's General Plan.

In conclusion, it is unlikely, speculative, and not reasonably foreseeable that the Project would induce growth in the form of additional economic activity or employment that would result in measurable impacts on the off-site physical environment.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE INITIAL STUDY PROCESS

The Initial Study prepared for the proposed Project in June 2020 determined that impacts listed below would be less than significant. Consequently, they have not been further analyzed in this EIR. Please refer to Appendix A for explanation of the basis of these conclusions. Impact categories and questions below are summarized directly from the CEQA Environmental Checklist, as contained in the Initial Study.

Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	
a) Have a substantial adverse effect on a scenic vista?	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact
c) In nonurbanized 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?	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant Impact



Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. 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:	
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?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact
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))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact
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?	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:	
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	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 Wildlife or U.S. Fish and Wildlife Service?	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact
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?	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant Impact



Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
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?	No Impact
V. CULTURAL RESOURCES. Would the project:	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	No Impact
VI. ENERGY. Would the project:	
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant Impact
VII. GEOLOGY AND SOILS. Would the project:	
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No Impact
ii) Strong seismic ground shaking?	Less than Significant Impact
iii) Seismic-related ground failure, including liquefaction?	No Impact
iv) Landslides?	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	No Impact
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?	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?	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant Impact
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 for people residing or working in the project area?	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact



Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
X. HYDROLOGY AND WATER QUALITY. Would the project:	
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact
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 a substantial erosion or siltation on- or off-site;	Less than Significant Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less than Significant Impact
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	Less than Significant Impact
iv) impede or redirect flood flows?	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant Impact
XI. LAND USE AND PLANNING. Would the project:	
a) Physically divide an established community?	No Impact
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?	No Impact
XII. MINERAL RESOURCES. Would the project:	
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact
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?	No Impact
XIII. NOISE. Would the project result in:	
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
XIV. POPULATION AND HOUSING. Would the project:	
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact



Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
XV. PUBLIC SERVICES. 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:	
a) Fire protection?	No Impact
b) Police protection?	No Impact
c) Schools?	No Impact
d) Parks?	No Impact
e) Other public facilities?	No Impact
XVI. RECREATION.	
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact
XVII. TRANSPORTATION. Would the project:	
d) Result in inadequate emergency access?	Less than Significant Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant Impact
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant Impact
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?	Less than Significant Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No Impact



Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
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?	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?	No Impact



6.0 ALTERNATIVES TO THE PROJECT

6.1 INTRODUCTION

An Environmental Impact Report (EIR) must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, an EIR must “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives”. This section identifies potential alternatives to the Project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are provided below to explain the foundation and requirements for the alternatives analysis in the EIR.

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly (Section 15126.6[b]).
- The specific alternative of ‘no project’ shall also be evaluated along with its impact (Section 15126.6[e][1]).
- The “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (Section 15126.6[f]).



- For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (Section 15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (Section 15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6[f][3]).

6.1.1 PROJECT OBJECTIVES

As stated in Section 3.0 of this EIR, and pursuant to Section 15124 of the State CEQA Guidelines, the objectives that have been established for the Project are listed below.

- Objective 1: Create a professional, well-maintained and attractive environment for the development of a warehouse building consistent with the underlying zoning adjacent to nearby transportation infrastructure such as the SR-710 and I-5 Freeways.
- Objective 2: Provide the entitlements and framework for the development of warehouse and office uses that are responsive to local, national, and international trade demands.
- Objective 3: Provide development that will enhance the City’s economic well-being and employment opportunities for community residents.
- Objective 4: Facilitate a project that provides goods to the regional economy.

6.1.2 SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis in Sections 4.1 through 4.9 of this EIR concludes that implementation of the Project would result in no impact; a less than significant impact; or a less than significant impact with incorporation of applicable mitigation measures for each of the thresholds of significance evaluated in this EIR. No significant and unavoidable impacts would result.

It should be noted that although the Project would not result in any significant and unavoidable impacts, Project-level mitigation measures are required to reduce potentially significant impacts to levels considered less than significant for the issue of Cultural Resources (due to the potential to encounter buried archaeological resources), Geology and Soils (due to the potential to encounter buried paleontological resources), and Tribal Cultural Resources (due to the potential to encounter buried tribal cultural resources). These potentially significant impacts are associated with construction activities, not operation of the Project.



6.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED ANALYSIS

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should 1) identify alternatives that were considered by the Lead Agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process, and 2) briefly explain the reasons underlying the Lead Agency's determination. Section 15126.6(c) of the CEQA Guidelines states, "[a]mong the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but not selected for detailed analysis in this EIR. As described in greater detail below, the main reason for rejecting these alternatives was that they would not avoid or substantially reduce the impacts associated with the Project and/or would not be consistent with the Project objectives.

6.2.1 ALTERNATIVE SITE

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by developing the project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][B]).

To meet the Project objectives and implement 5200 Sheila Street Project, the Alternative Site for consideration in this analysis could include other parcels within the Commerce Park Planning Area or in other Industrial land use areas where the City of Commerce anticipates future industrial development. For this alternative, any development within these areas would need to be consistent with the Project, the Project objectives, and development anticipated in the area, as presented in City of Commerce General Plan and zoning. It should be noted that the Commerce Park Planning Area encompasses the southern half of the City, south of Sheila Street and exclusive of the Southeast Planning Area. The City's General Plan Section 3.5.4.6 for this area encourages the continued presence of all types of industry throughout the planning area (City of Commerce, 2008, p. 48).

Under existing conditions, the entire Commerce Park Planning Area is heavily developed. Other parcels are developed with industrial, commercial, transport, or public facility uses. Implementing the Project on a different parcel would require acquisition of developed property, demolition of existing operational structures, and discontinuing existing land uses, which is likely to disrupt existing businesses and operations, and would result in environmental impacts similar to those identified for the Project. As identified in the analysis presented in Sections 4.1 through 4.9 of this EIR, all potentially significant impacts are related to the inadvertent discovery of archaeological, paleontological, and tribal cultural resources during grading activities. These potential impacts would



continue to occur for any redevelopment or development within the City limits. Development at an Alternative Site would only move Project impacts to a different location.

The Project-related increase in truck and vehicular trips and the associated air pollutant emissions, off-site increases in traffic-related noise, and GHG emissions, which would be less than significant with the Project, would also occur with development at an Alternative site. Further, the proposed Project is anticipated to result in a nominal net increase of 6 trip ends per day as compared to the existing use. An Alternative Site would have the potential to result in a greater impact if the existing trip generations of such a site were less than the existing conditions of the Project site (346 daily trips).

Last, the Project Applicant does not own other property in the Commerce Park Planning Area or any other location in the City that could accommodate the Project, other than the Project site. It would not be feasible for the owner to control or otherwise have access to another site of a similar size to the Project site. CEQA does not require the consideration of infeasible sites that are not owned by the landowner or that could not be reasonably acquired by the landowner to be analyzed as alternatives to the Project (State CEQA Guidelines, Section 15126.6[f][1]).

6.2.2 ALTERNATIVE DEVELOPMENT PROJECT ON-SITE

It is typical to consider alternative development scenarios for a Project (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) when identifying potential alternatives to avoid or reduce potential significant impacts resulting from construction or operation of a project to a less than significant level. As previously identified, and as demonstrated through the analysis presented in Section 4.1 through Section 4.9 of this EIR, the Project would not result in any significant and unavoidable impacts. The Project's potential impacts are less than significant with incorporation of applicable mitigation measures from Project-level mitigation measures.

Implementation of an alternative development scenario that could potentially meet the Project objectives would also require the removal of the existing buildings, site preparation, grading/excavation, and building construction. All Project impacts that require Project-level mitigation are associated with construction activities, not operation, and would therefore also occur under an alternative development scenario onsite. For that reason, there is no need to further evaluate alternative development scenarios.

6.3 ALTERNATIVES ANALYSIS

When considering potential alternatives to the Project, the City focused on alternatives that would avoid or reduce the potentially significant impacts. As discussed previously, because the Project's potentially significant impacts, prior to mitigation, are related to construction, the only type of development that would avoid these impacts would involve retention and reuse of the existing buildings and facilities. As described below, this also would fulfill the CEQA requirements for evaluating a "no project alternative."



For the alternative evaluated below, it is assumed that relevant regulatory requirements and Project-specific mitigation measures would also be implemented and thus serve to reduce or avoid potential significant impacts similar to the Project.

6.3.1 NO PROJECT ALTERNATIVE – REUSE OF EXISTING BUILDINGS

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate a “no project” alternative to allow decision makers to compare the impacts of approving a project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternatives: (1) when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed.

The Project is consistent with City of Commerce General Plan land use type and zoning for the Project site and a General Plan Amendment or Change of Zone is not needed. Similarly, the Project does not conflict with the land uses allowed by the existing zoning for the site. Thus, the Project represents development that would be allowed under current City regulations.

A. Description of Alternative

The No Project Alternative – Use of Existing Buildings (No Project Alternative) addressed in this section represents both types of no project alternatives outlined in the CEQA Guidelines: (1) continuation of development consistent with the existing community development type and zoning designations, and (2) assumes the Project does not proceed (leaving the existing buildings on-site). A No Project Alternative that would involve retention of the existing buildings but no associated operations is not being considered; such an alternative would not meet the Project objectives.

Under this alternative, the existing buildings and associated facilities on-site would be retained and reoccupied for use consistent with that allowed by right pursuant to Section 19.11, Manufacturing Zones, of the City’s Municipal Code. This includes, but is not limited to, ongoing industrial and office uses. The existing facilities at the Project site include two buildings with 104,888 sf of office use and an 8,065-sf cafeteria building.

B. Comparative Analysis of Environmental Impacts

The focus of this analysis is to determine if the No Project Alternative is capable of eliminating or reducing the potentially significant environmental effects of the Project. As previously noted, the Project would not result in any significant and unavoidable impacts; therefore, the analysis addresses significant effects that might occur if the identified Project-level mitigation measures are not applied.

With respect to archaeological, paleontological, and tribal cultural resources, the No Project Alternative would not involve any excavation or grading activities. Therefore, the potential to discover



previously unidentified archaeological, paleontological, and tribal cultural resources is eliminated. As such, the potential for impacts to archaeological, paleontological, and tribal cultural resources with the No Project Alternative would be less than with the Project. However, the Project impacts would be less than significant with Project-level mitigation. Therefore, the No Project Alternative would reduce significant impacts related to archaeological, paleontological, or tribal cultural resources.

The Project would not result in any significant impacts before mitigation for any other topical issues and therefore do not need to be assessed under the No Project Alternative.

C. Conclusions

Avoid or Substantially Lessen the Significant Impacts of the Project

As presented in Sections 4.1 through 4.9 of this EIR, the Project would not result in any significant and unavoidable impacts; therefore, the No Project Alternative would not avoid or substantially lessen a significant and unavoidable impact. However, Project-level mitigation measures are required to reduce potentially significant impacts to levels considered less than significant for inadvertent discovery of archaeological, paleontological, or tribal cultural resources. These potentially significant impacts are associated with construction activities, not operation of the Project. As described above, the No Project Alternative reduce these impacts since grading would not occur.

Attainment of Project Objectives

The discussion below addresses the ability of the No Project Alternative to attain the project objectives.

- A. Create a professional, well-maintained and attractive environment for the development of a warehouse building consistent with the underlying zoning adjacent to nearby transportation infrastructure such as the SR-710 and I-5 Freeways.** The No Project Alternative would not involve the redevelopment of the Project site, rather it would involve the continued use or reuse of existing buildings and facilities at the Project site for commercial/office use. Therefore, the No Project Alternative does not meet the overall intent of this Project objective and redevelopment of the Project site is necessary to accomplish this objective.
- B. Provide the entitlements and framework for the development of warehouse and office uses that are responsive to local, national, and international trade demands.** The No Project Alternative would not include entitlements for redevelopment responsive to local, national, and international trade demands. No Project Alternative does not meet the overall intent of this Project objective and redevelopment of the Project site is necessary to accomplish this objective.
- C. Provide development that will enhance the City's economic well-being and employment opportunities for community residents.** While the No Project Alternative would continue to generate revenue, the Project site is currently underutilized. The proposed redevelopment of



the Project with a contemporary logistics center would provide increased employment opportunities and generate additional property tax value for the City. Additionally, the new warehouse building is likely to attract e-commerce users that also generate sales tax revenue. Therefore, the No Project Alternative would not meet this objective.

- D. Facilitate a project that provides goods to the regional economy.** The No Project Alternative would not involve the redevelopment of the Project site, rather it would involve the continued use or reuse of the existing buildings and facilities at the Project site for continued commercial/office use. Therefore, the No Project Alternative would not provide goods to the regional economy and does not meet the overall intent of this Project objective.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. As discussed above, the No Project Alternative, would not require construction and would not cause construction-related impacts. However, Section 15126.6(e)(2) of the CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the analysis presented in Section 4.1 through 4.9 of this EIR, compliance with applicable regulations and implementation of Project-level mitigation measures (for potential impacts related to archaeological, paleontological, and tribal cultural resources), the Project would not result in any significant and unavoidable impacts. Therefore, for the reasons outlined in Section 6.2.2, above, there is no need to further evaluate alternative development scenarios (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) compared to the Project. Any alternative development scenario would have similar impacts as the Project related to construction activities, and the Project would not result in any significant operational impacts that would be avoided by an alternative.

Therefore, there are no other alternatives evaluated in this EIR that would be considered environmentally superior to the Project.



7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 CITY OF COMMERCE

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7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the 5200 Sheila Street Project EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the City of Commerce, Economic Development and Planning Department, 2535 Commerce Way, Commerce, California 90040.

Appendix A: Initial Study for 5200 Sheila Street Project EIR, Notice of Preparation (NOP), and Written Comments on the NOP.



- Appendix B1: Urban Crossroads, 2020a. *5200 Sheila Street Air Quality Impact Analysis*. Dated October 6, 2020.
- Appendix B2: Urban Crossroads, 2020b. *5200 Sheila Street Mobile Source Health Risk Assessment*. Dated October 6, 2020.
- Appendix B3: Urban Crossroads, 2020c. *5200 Sheila Street Greenhouse Gas Analysis*. Dated October 6, 2020.
- Appendix C: Brian F. Smith and Associates, 2019a. *Cultural Resources Study for the Commerce Logistics Center Project*. Dated December 13, 2019.
- Appendix D: Urban Crossroads, 2020d. *5200 Sheila Street Energy Analysis*. Dated October 6, 2020.
- Appendix E: Brian F. Smith and Associates, 2019b. *Paleontological Assessment for the Commerce Logistics Center Project*. Dated December 13, 2019.
- Appendix F: EMG, 2018. *Phase I Environmental Site Assessment 5200 Sheila Street*. Dated October 10, 2018.
- Appendix G1: Thienes Engineering, 2019a. *Preliminary Hydrology Calculations for Commerce Logistics Center*. Dated October 28, 2019.
- Appendix G2: Thienes Engineering, 2019b. *Low Impact Development for Commerce Logistics Center*. Dated November 8, 2019.
- Appendix H: Urban Crossroads, 2020e. *5200 Sheila Street Noise Impact Analysis*. Dated April 18, 2020.
- Appendix I1: Urban Crossroads, 2020f. *5200 Sheila Street Focused Traffic Assessment*. Dated October 6, 2020.
- Appendix I2: Urban Crossroads, 2020g. *5200 Sheila Street Vehicle Miles Travelled Assessment*. Dated April 1, 2020.

7.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is available to the public at the location listed below.

Cited As: **Citation:**



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7.4 DOCUMENTS AND WEBSITES CONSULTED

Cited As: **Citation:**

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7.5 PERSONS CONSULTED/WRITTEN OR VERBAL COMMUNICATION

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