DRAFT
ENVIRONMENTAL IMPACT REPORT
STATE CLEARINGHOUSE NO.2021110098
5037 PATATA STREET
INDUSTRIAL DEVELOPMENT
SOUTH GATE, CALIFORNIA

LEAD AGENCY:

CITY OF SOUTH GATE
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NOVEMBER 16, 2022

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SECTION 1.0 INTRODUCTION & SUMMARY

1.1 PURPOSE OF THIS EIR

In conformance with the California Environmental Quality Act (CEQA), this Draft Environmental Impact Report (Draft EIR) provides an environmental assessment of the potential impacts associated with construction and subsequent operation of the proposed 5037 Patata Street Industrial Development (also referred to herein as the "proposed project"). The proposed project would involve the construction and subsequent operation of a new warehouse and industrial development that would total 435,420 square-feet of floor area. The proposed development would include a new main building consisting of 435,420 square feet and a smaller truck maintenance building consisting of 16,173 square feet. The new tilt-up main building would consist of corporate offices, a warehouse, cooler space, as well as mezzanine space. The main building would also include a two-level office area consisting of 30,000-square-feet of floor area located in the southwestern corner of the main building. The warehouse portion of the main building would include a loading and storage area, a total of 22,000 square feet of 36° cooler storage, and 134,400 square feet of 60° cooler storage. The 27.12-acre project site is located at 5037 Patata Street, within the northeastern portion of the City of South Gate.[1] For this reason, the City of South Gate is the designated Lead Agency for this project.[2] The proposed project is described further herein in Section 2.

CEQA requires that before a decision can be made to approve a discretionary project, the appropriate CEQA document must be prepared, circulated, and reviewed (in this case, an EIR. This EIR is intended as an informational document to assist decision-makers in making an informed judgement as to whether to approve or deny the project. This EIR is designed to inform City of South Gate staff, the Planning Commission, the City Council and the public regarding the following:

- The potential environmental consequences that can be expected with the proposed project's implementation;
- The applicable standard conditions of approval, project design measures, and/or mitigation measures necessary to lessen or avoid significant adverse impacts; and
- A reasonable range of feasible alternatives to the proposed project that would lessen or avoid any potentially significant and adverse impacts of the project.

The information contained in this EIR will be reviewed and considered by public agencies prior to the Lead Agency's making a decision to approve, reject, or modify the project. This EIR characterizes the proposed project's short-term (construction-related) impacts and analyzes its long-term (operational) impacts. The City of South Gate (as Lead Agency for this project) circulated a *Notice of Preparation* (NOP) and an Initial Study for a 30-day period to inform the public and other agencies that a *Draft EIR* will be prepared for the proposed project. In addition, the NOP and the Initial Study indicated the scope and extent of the environmental analysis that should be considered in the Draft EIR. A copy of the NOP, Initial Study, and the comment letters received following the conclusion of the 30-day review period are included in Appendix A. This Draft EIR will be

[1] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[2] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions.* As Amended 2001. §21067.

circulated for public review for a minimum of 45 days. During this 45-day review period, agencies, the public, and other interested parties are requested to comment on the Draft EIR focusing on the environmental analysis and any identified mitigation. The City of South Gate will then oversee the preparation of the responses to the individual comments received, and both the comments and City's responses will be incorporated into the *Final EIR*. The Final EIR will then be considered along with the project at public hearings.

1.2 OVERVIEW OF THE PROPOSED PROJECT

The proposed project would involve the construction and subsequent occupancy of a new industrial and warehouse development that would total 451,593 square-feet of floor area. The proposed development would include a new main building consisting of 435,420 square feet and a smaller truck maintenance building consisting of 16,173 square feet. The new tilt-up main building would consist of corporate offices, a warehouse, and cooler space, as well as mezzanine space. The main building would include 45,000-square-feet of office space located in the southwestern corner of the main building. The warehouse portion of the main building would include a loading and storage area, a total of 22,000 square feet of 36° cooler storage, and 134,400 square feet of 60° cooler storage.[3] The 27.12-acre project site is located at 5037 Patata Street, within the northeastern portion of the City of South Gate. For this reason, the City of South Gate is the designated Lead Agency for this project.[4] The proposed project is described further herein in Section 2.

1.3 INTENDED USES OF THIS EIR

In accordance with *CEQA Guidelines* Section 15121(a), the purpose of this EIR is to serve as an informational document that will inform public agency decision makers and the public of the potentially significant environmental effects of a project, and to identify possible ways to minimize or avoid the significant effects. This EIR also includes an analysis of a reasonable range of alternatives to the proposed project. This EIR, in terms of scope and content, is consistent with Section 15161 of the *CEQA Guidelines,* which states that an EIR should primarily focus on the changes in the environment that would result from the proposed project's implementation and the transition of the project site from its current condition to that anticipated following the construction and subsequent operation of the proposed project.

Pursuant to Section 15105 of the *CEQA Guidelines,* this EIR will be circulated for public review for a period of 45 days, beginning November 5, 2021 and ending December 6, 2021. Questions and/or comments should be submitted to the following contact person:

Yalini Siva, Senior Planner
City of South Gate, Planning and Development Department
8650 California Avenue
South Gate, California 90280

[3] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[4] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions.* As Amended 2001. §21067.

1.4 FORMAT OF THIS EIR

This EIR analyzes the potential environmental impacts that may result from the implementation of the proposed project. This EIR consists of the following sections:

- *Section 1 Introduction and Summary* provides an overview of the environmental review process, describes the purpose of this EIR, indicates the focus of the environmental analysis, and includes a summary.

- *Section 2 Project Description* describes the proposed project and includes a discussion of the objectives the Lead Agency seeks to accomplish with the construction and subsequent operation of the proposed project. This section also indicates the discretionary actions associated with the proposed project's approval.

- *Section 3 Environmental Analysis* evaluates the impacts associated with the construction and subsequent operation of the proposed project. The analysis considers the existing conditions with respect to the issue being discussed, the potential impacts related to the project's construction and subsequent operation, the level of the potential impact weighed against thresholds considered to represent a significant adverse impact, and measures that will be effective in reducing or eliminating a potential impact.

- *Section 4 Other CEQA Considerations* discusses the manner in which the proposed project will contribute to long-term impacts and cumulative impacts from related projects in the area. This section also indicates those issues where the impact is significant and unavoidable and describes potential growth-inducing impacts.

- *Section 5 Alternatives Analysis* discusses various alternatives that were considered as part of the planning process. The impacts of a no project alternative, a design alternative, and a land use alternative are considered in this analysis.

- *Section 6 References* lists those individuals involved in this document's preparation and the primary references consulted in the analysis.

- The *Appendices* include a copy of the Initial Study, the Notice of Preparation (NOP), the responses to the NOP, and the various technical studies.

1.5 FOCUS OF ENVIRONMENTAL ANALYSIS

As part of the environmental review for the proposed project, the Lead Agency prepared and circulated a Notice of Preparation that (NOP) identified those issues that would be evaluated in the EIR. The NOP provided the basis for determining the nature and scope of the environmental analysis that should be undertaken as part of the EIR's preparation. The environmental analysis in this EIR focused on those issues where it was determined, as part of the Initial Study's preparation, that there was a potential for significant environmental impacts in the absence of mitigation.

The issues that were identified as requiring analysis in this EIR are listed below:

Aesthetics (Section 3.1)
Agriculture & Forestry Resources (Section 3.2)
Air Quality (Section 3.3)
Biological Resources (Section 3.4)
Cultural Resources (Section 3.5)
Energy (Section 3.6)
Geology & Soils (Section 3.7)
Greenhouse Gas Emissions (Section 3.8)
Hazards & Hazardous Materials (Section 3.9)
Hydrology & Water Quality (Section 3.10)
Land Use & Planning (Section 3.11)
Mineral Resources (Section 3.12)
Noise (Section 3.13)
Population & Housing (Section 3.14)
Public Services (Section 3.15)
Transportation (Section 3.16)
Tribal Cultural Resources (Section 3.17)
Utilities & Service Systems (Section 3.18)
Wildfire (Section 3.19)

1.6 AREAS OF POTENTIAL CONTROVERSY

As indicated previously in Section 1.3, the Initial Study and NOP were circulated by the City to the State Clearinghouse, interested agencies, and the public. The State Clearinghouse issued a project number for this EIR (SCH No. 2021110098). The NOP was circulated for comments beginning November 5, 2021 and ending December 6, 2021. A copy of the NOP and comments received on the NOP are included in Appendix A of this EIR. Responses to the NOP were received from the following agencies:

- South Coast Air Quality Management District (SCAQMD);
- California Department of Transportation (Caltrans), District 12; and,
- Native American Heritage Commission (NAHC).

In addition, a scoping meeting was held on December 15, 2021, to discuss the proposed project with nearby property owners. property owners. The major issues raised by local residents and representatives from the City of Cudahy included traffic, noise, and potential hazardous materials associated with the former business that occupied the site, and emissions during construction activities. This EIR addresses each of the aforementioned areas of concern.

1.7 SUMMARY OF ENVIRONMENTAL ANALYSIS

This EIR analyzes the potential environmental impacts that may result from the construction and subsequent operation of the proposed project. The analysis focuses on the proposed project's impacts for a number of issue areas including those identified in Section 1.5. The findings of the environmental analysis are summarized in Table 1-1 provided on the following pages.

Table 1 1
Summary of Impacts

Environmental Setting	Impacts	Conclusions
Aesthetic Impacts		
The project site is located in the midst of an urban area. Surrounding land uses in the vicinity of the project site include the following: • *North of the Project site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street. These uses are all considered to be light sensitive. In addition, the site dominates the views from those homes located along the south side of Fostoria Street. • *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate. These industrial uses are older buildings with metal siding. An active railroad spur track that serves industrial use is located to the south of the project site • *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site. Much of the area between the project site and the river channel is unmaintained and is occupied by homeless encampments from time to time. • *West of the Project Site*. A trucking use is located to the west of the project site. Wilcox Avenue generally extends along the project site's west side. Various commercial and industrial land uses are located further west. The shoulder of Patata Street continuing westerly to Atlantic often contain trash and discarded debris. The only remaining structural improvements located within the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site. Historic aerial photographs show that the project site contained structures on the western half of the project site dating back to 1954. The project site has no street frontage and has a single point of ingress and egress that is located at the eastern terminus of Patata Street.	The project site is located in the midst of an urbanized area. According to the City of South Gate General Plan Community Design Element, there are no significant and/or protected viewsheds in the immediate area. The Los Angeles River is located to the east of the project site though it is a fully concrete lined flood control channel at this location. The San Gabriel Mountains are located approximately 17 miles north of the site. Finally, the Pacific Ocean is located approximately 13.5 miles to the south of the project site. The views of these features will not be obstructed by the proposed project. During the ongoing site preparation, remediation, and development phases, the project would be required to comply with the applicable South Gate Municipal Code regulations governing property maintenance. The Municipal Code requires a construction site be maintained in a clean and well-kept manner. No component of the project's construction would conflict with these applicable regulations. The City of South Gate's Zoning and Development Code includes design standards and property maintenance requirements and other visual considerations. These design standards would help reduce the potential for aesthetic conflicts. As a result, no significant adverse impacts are anticipated.	**Conclusions:** The long-term project-related aesthetic impacts would not be significant. **Mitigation Measures:** No mitigation is required. **Significance after Mitigation:** Less than Significant Impacts would result.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Agriculture & Forestry Impacts		
The project site is located in the northeastern corner of the City of South Gate that consists of manufacturing and distribution uses. Residential development extends along the northern boundary of the project site within the corporate boundaries of the City of Cudahy. The project site is generally bounded by the Los Angeles River along the eastern side of the project site, Patata Street and the Union Pacific Railroad (Patata Industrial Lead line) is located to the south, an industrial property and Wilcox Avenue is located to the west, and a residential neighborhood is located to the north. There are no farmland activities or forestry resources currently located within the project site. No mapped resources are located in the area according to the Farmland Mapping and Monitoring Program.	According to the California Department of Conservation, the City of South Gate does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The entire City is urban and not classified as having Important Farmland. The project site is currently zoned as *M3 (Heavy Manufacturing*). The City's General Plan designates the site as *Industrial* and the General Plan does not identify any agricultural or forestland uses within City boundaries. There are no agricultural uses currently located within the site that would be affected by the project's implementation. Furthermore, the implementation of the proposed project will not involve the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to urban uses, no impacts will occur.	**Conclusions:** There would not be any impacts on this issue since there are no designated farmland of forestry uses within the project site. **Mitigation Measures:** No mitigation measures are required. **Significance after Mitigation:** No impacts would result.
Air Quality Impacts		
The project site is located in the northeastern corner of the City of South Gate that consists of manufacturing and distribution uses. Residential development extends along the northern boundary of the project site within the corporate boundaries of the City of Cudahy. The City of South Gate and the project site are located in the SCAB. The SCAB is a 6,645-square mile area bounded by the San Gabriel, San Bernardino, and the San Jacinto Mountains to the north and east, and the Pacific Ocean to the west. The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, along with the San Gorgonio Pass area of Riverside County. The distinctive climate of the SCAB is attributable to its terrain, which is a coastal plain with connecting broad valleys and low hills, and its geographical location, which is bounded by the Pacific Ocean to the west and high mountains to the north, east, and south. The extent and severity of air pollution in the SCAB is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of air pollutants throughout the SCAB, making it an area of high pollution potential.	The proposed project's criteria pollutant emissions would not exceed the SCAQMD's daily thresholds of significance. Therefore, the project would not contribute to an existing air quality violation. Thus, the project would be consistent with the first criterion. Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Although the proposed project calls for a change in zoning, the change proposed is from M3 to M2. The General Plan designation will remain Industrial. The proposed Project would not result in a direct increase in population since the proposed project is not a residential use and would not accommodate any new residents. The proposed project is a new industrial use that would replace an older obsolete use that has been demolished. As a result, the project would not result in substantial "unplanned growth or unaccounted growth" that would affect job growth projections used by the SCAQMD to develop the AQMP. The daily construction emissions would not anticipated to exceed the SCAQMD significance thresholds. The operational (long-term) emissions will be below the SCAQMD's daily emissions thresholds.	**Conclusions:** The short-term and long-term air quality impacts would be less than significant. **Mitigation Measures:** The analysis determined that the short-term and long-term air quality impacts would be below thresholds that are less than significant. While no specific mitigation is required, there are a number of SCAQMD regulations that were identified in Section 3.3.2.1 that would be adhered to that would further reduce the level of emissions. Conformance to these rules would further reduce impacts to less than significant. **Significance after Mitigation:** The impacts would be less than significant.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Biological Resources Impacts		
Currently, the majority of the site is paved over from the former industrial plant. However, the eastern portion of the site is undeveloped. There is a well-defined vegetated swale, which drains to the southeast corner of the site. The swale accepts runoff from the project site and offsite run-on from the north which drains to the south, then flows southeasterly. The swale ends near the southeast corner of the site where it appears that runoff ponds up then spills out into a landscape strip paralleling the Los Angeles River. This landscape strip has an existing headwall and 24" storm drain which collects the runoff from the site, areas north of the site, the northern portion of the railroad right of way, and the slope/landscape strip west of the Los Angeles River. The South Gate General Plan 2035 states that "there are no known threatened or endangered species and very sparse wildlife, though migratory or native birds may be found in natural areas	Due to the current state of the project site and the level of development in the surrounding area, the project site does not offer a suitable habitat for any of the aforementioned rare and/or endangered species. There are no local or regional plans, policies, or regulations that identify any riparian habitat or other sensitive natural community, nor does the California Department of Fish and Wildlife identify any such habitat. The portions of the Los Angeles River that are located near to the project site are concrete-lined and do not offer suitable riparian vegetation for the aforementioned species. A review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper classifies the Los Angeles River as riverine but does not identify any wetlands in the project site. There would be potentially significant impacts on migratory avian species related to tree removal.	**Conclusions:** There would be potentially significant impacts on migratory avian species related to tree removal. **Mitigation Measures:** The following mitigation measure would be required to reduce the project's potential impacts related to tree removal impacts and migratory birds: *Biological Resources Mitigation Measure No. 1.* If clearing and/or construction activities will occur during the raptor or migratory bird nesting season (February 15–August 15), the project contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before construction activities. The qualified biologist shall survey the construction zone and a 500-foot buffer surrounding the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist. **Significance after Mitigation:** The impacts would be less than significant.
Cultural Resources		
Located in southeastern Los Angeles County, the area that would become the City of South Gate was a 30,000-acre land grant given to Antonio Maria Lugo and his father by King Ferdinand VII of Spain in 1810 for their family's military service. Known as Rancho San Antonio, the grant was turned into a ranch focusing on cattle farming and agriculture. The original land grant was passed along and subdivided between descendants of the Lugo family.	On October 12, 2021, a records search for the project site and a 0.5-mile radius beyond the project boundaries was conducted at the SCCIC located at California State University, Fullerton. The current inventories of the NRHP, the CRHR, the CHL list, the PHI list, and the California Built Environment Resource Directory (BERD) for Los Angeles County were also reviewed to determine the existence of previously documented local historical resources.	

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Cultural Resources (Continued)		
By 1870, much of the original Rancho San Antonio was parceled into 40-acre tracts. As the size of individual holdings decreased, agriculture, particularly fruit orchards along with cauliflower, beets, barley, beans, and dairy farms replaced cattle ranching by the 1880s. The earlier discovery of gold in Los Angeles County brought an influx of migrants to the region. This combined with the completion of the Southern Pacific Railroad, the Santa Fe Railroad, and a rapidly growing Los Angeles meant that real estate prices in the surrounding communities soared as demand for housing increased. On September 23, 1917, Charles B. Hooper, a realtor, purchased large tracts of agricultural land to develop into housing. From the postwar World War II period to today, the City of South Gate continues to be a vibrant working class community home to 98,633 persons, many of whom work in local industries or commute to the larger Los Angeles metropolitan area.	The results of the records search indicate that two historic resources have been recorded within 0.5- mile of the project site. Table 3-6 identified those recorded sites and studies that have been recorded within 0.5 miles of the project site. As indicated in the table, there are no recorded sites within the project boundaries. In addition, seven area-specific survey reports are on file within 0.5-mile radius; one report (LA-11993) addresses the project site, and two reports (LA-08255 and LA-04834) are immediately south of the project boundaries. This indicates that the project site has previously been surveyed for cultural resources. Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, the survey considered the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be low to moderate. The results from the NAHC Sacred Lands File search were negative for the presence of TCRs within the project site. No prehistoric resources were identified during the pedestrian survey. The cultural resources study prepared for the proposed project recommends that an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, be present to monitor the site during the initial removal of asphalt, grubbing, and prior to grading and trenching of the site to check for the inadvertent exposure of cultural materials. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist. Full-time archaeological monitoring is not recommended at this time. Standard procedures for the inadvertent discovery of human remains and cultural resources should be followed.	**Conclusions:** There is a potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be low to moderate. The results from the NAHC Sacred Lands File search were negative for the presence of TCRs within the project site. No prehistoric resources were identified during the pedestrian survey; however, the presence of unrecorded building foundations within the project boundaries increase the possibility that subsurface undiscovered cultural resources may be encountered. As a result, the impact would be potentially significant and mitigation is required. **Mitigation Measures:** The following mitigation measure would be required to reduce the project's potential impacts related to potential unknown archaeological resources: *Archaeological Resources Mitigation Measure No. 1.* an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, be present to monitor the site during the initial removal of asphalt, grubbing, and prior to grading and trenching of the site to check for the inadvertent exposure of cultural materials. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist. Full-time archaeological monitoring is not recommended at this time. Standard procedures for the inadvertent discovery of human remains and cultural resources should be followed. As indicated previously, *Health and Safety Code, Sections 7050.5 and 7052* State Health and Safety Code (HSC) §7050.5, declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease, and the county coroner must be notified. **Significance after Mitigation:** The impacts would be less than significant.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Energy Impacts		
Southern California Edison (SCE) provides electrical services in the City of South Gate through State-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, generation of electricity is usually not tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatts (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy produced by a unit; minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours, or gigawatt-hours. The Southern California Gas Company provides natural gas services to the City of South Gate. Natural gas is a hydrocarbon fuel found in reservoirs beneath the earth's surface and is composed primarily of methane. It is used for space and water heating, process heating and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in coming years because it is a relatively clean alternative to other fossil fuels like oil and coal. In California and throughout the western United States, many new electrical generation plants that are fired by natural gas are being brought online.	The proposed project will have a total floor area of 424,220 square feet of floor area. The main building's footprint would be 435,420 square feet and would consist of corporate offices, a warehouse, storage and cooler space, as well as mezzanine space. There would also be a 45,000-square-foot office located in the southwestern corner of the main building. The warehouse portion of the main building would consist of a loading and storage area, a total of 22,000 square feet of 36° cooler storage, and a total of 134,400 square feet of 60° cooler storage. The second, smaller building would consist of 16,173-square-feet of floor area. This building would be truck maintenance workshop that would be located at the southeast corner of the project site. The project will include 58 EV charging stations for automobiles, 96 EV charging stations will be installed at occupancy and 62 EV charging stations for future zero carbon delivery vehicles. In addition, each dock high loading door would be provided with an electrical source/plug-in installed for EV trucks. Additionally, 69 stalls would be striped for Clean Air Vehicle vanpool/carpool/low-emitting fuel-efficient vehicles.	**Conclusions:** The proposed project's impacts would be less than significant. **Mitigation Measures:** No mitigation measures are required. **Significance after Mitigation:** The impact would be less than significant.
Geology & Soils Impacts		
The City of South Gate is not located within a designated Alquist-Priolo designated fault zone. The Avalon-Compton Fault is the closest known fault to the project site. This fault is located 4.7 miles to the southwest. The project site is not located within the fault zone of the Avalon-Compton Fault. According to the United States Geological Survey (USGS), liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity.	. The geotechnical report prepared for the project indicated that the site is located in an area which is subject to strong ground motion due to earthquakes. Due to economic considerations, it is not generally considered reasonable to design a structure that is not susceptible to earthquake damage. Therefore, significant damage to structures may be unavoidable during large earthquakes. The proposed structure would, however, be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage and loss of life.	**Conclusions:** The proposed project would not be exposed to any fault rupture hazards risk and the risk from ground-shaking and liquefaction onsite is no greater than that for the surrounding area.. **Mitigation Measures:** No mitigation beyond the standard design and structural engineering design measures identified . **Significance after Mitigation:** Impacts would be less than significant.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Geology & Soils Impacts (Continued)		
Although the project site is located in an area that is subject to liquefaction, the proposed project involves modern construction techniques that will reflect the latest building codes. According to the California Department of Conservation. all of South Gate is considered at an elevated risk for liquefaction due to the soil types that underlie the site (artificial fill and natural alluvium) and a high-water table (less than 40 feet below the surface). The generally flat topography of South Gate indicate that underlie the sites that the City does not have an elevated risk associated with landslides. However, the community faces the possibility of small landslides along the Los Angeles River, drainage channels, or other areas where steep slopes occur.		
Greenhouse Gas Impacts		
GHG differ from criteria or toxic air pollutants in that the GHG emissions do not cause direct adverse human health effects. Rather, the direct environmental effect of GHG emissions is the increase in global temperatures, which in turn has numerous impacts on the environment and humans. Some examples of observed changes include shrinking glaciers, thawing permafrost, late freezing, early break-up of ice on rivers and lakes, a lengthened growing season, shifts in plant and animal ranges, and earlier flowering of trees. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The Greenhouse Gas Inventory was conducted separately for municipal sources (resulting from City operations) and community sources (resulting from transportation, building energy use, and waste produced by all South Gate residents). Total municipal emissions in South Gate (8,678 metric tons of carbon dioxide equivalent (MTCO2E) are only around 1.5% of the amount of total community emissions (575,206 metric tons MTCO2E. Of community emissions, 51.5% came from residential and commercial building energy use, 41.4% came from transportation within city limits, and 7.1% came from waste produced by residents.	Project construction activities would generate emissions of CO2, CH4 and N20 and these construction-source emissions are quantified and amortized over the life of the proposed project. Project construction-source GHG emissions were amortized over a 30-year period and added to the annual operational-source GHG emissions of the project. The proposed project's operations would result in emissions of CO2, CH4, and N2O from the primary sources including the following: *area sources, energy sources, and mobile sources*. 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. The proposed project and uses will also result in the generation and disposal of solid waste. GHG emissions from landfills are associated with the anaerobic breakdown of solid waste disposed at the land fill. The SCAQMD has adopted interim GHG thresholds for development projects within the South Coast Air Basin. According to the SCAQMD, the thresholds for industrial projects are 10,000 MTCO2E per year. Table 3-8 summarizes annual greenhouse gas (CO2E) emissions from build-out of the proposed project. The CO2E total GHG emissions for the project is 28,357 pounds per day or 12.66 MTCO2E per day. This translates into an annual emission of 4,621 MTCO2E, which is below the aforementioned threshold of 10,000 MTCO2E for industrial projects.	**Conclusions:** The total GHG emissions for the project is 28,357 pounds per day or 12.66 MTCO2E per day. This translates into an annual emission of 4,621 MTCO2E, which is below the aforementioned threshold of 10,000 MTCO2E for industrial projects. The analysis determined that the proposed project's GHG impacts would be less than significant with adherence the low impact development (LID) requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) and compliance to Transportation Demand Management (TDM) requirements. **Mitigation Measures:** No mitigation is required beyond the standard design measures. **Significance after Mitigation:** Impacts would be less than significant.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Hazards & Hazardous Materials Impacts		
The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum floor tiles.. Soon after construction, the plant was used to manufacture resilient flooring. Chemical use at the site have included asbestos, used as a filler in the vinyl floor tiles, chlorinated volatile organic compounds (VOCs), namely 1,1,1-trichloroethane (1,1,1-TCA) used in the former coating line (discontinued in approximately 1993); nonchlorinated VOCs, including methyl ethel ketone (MEK) used as a cleaning solvent; semi-VOCs (SVOCs), including diisononyl phthalate (DINP) and butyl benzyl phthalate (BBP) in liquid oils used as a plasticizer; polychlorinated biphenyls (PCBs) used in cooking oils in four pad-mounted transformers; and petroleum hydrocarbons used as fuels and lubricating oils. Previous investigations have shown no detectable to low concentrations of non-chlorinated VOCs, petroleum hydrocarbons, SVOCs, PCBs, and metals. Concentrations of chlorinated VOCs in soil gas and groundwater have been discovered at the site, along with asbestos containing soil and buried tile chips, and asbestos-containing building materials (ACBMs). The project site is also located within a regional VOC groundwater plume, known as the "Northeast 710 (NE710) Study Area." The DTSC is actively pursuing potential responsible parties (PRPs) who may have impacted groundwater with VOCs due to historical land uses. Regional groundwater is reported to be impacted with trichloroethene (TCE), tetrachloroethylene (PCE), 1,1-dichlorothane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), 1,2-dichloroethane (1,2-DCA), cis-1,2-dichloroethene (cis-1,2-DCE), vinyl chloride, chromium, arsenic, and nickel. Due to the regional groundwater issue and reported use of VOCs at the site, Armstrong entered into a Corrective Action Consent Agreement (CACA) in January 2020 with the DTSC to investigate possible on-site sources and determine if Armstrong is a responsible party to this regional issue. During investigations completed at the site, five groundwater monitoring wells were installed and monitored. Groundwater has been measured at a depth of approximately 60 feet below the ground surface (bgs).	The Department of Toxic Substances (DTSC) reviewed the Interim Measures Workplan (Workplan) that was submitted by Ardent Environmental Group, Inc. on behalf of the owner of the property. Hazardous substances documented as having been used and/or stored on the site include, but are not limited to volatile organic compounds (VOCs), such as 1,1,1-trichloroethane, trichloroethylene, and vinyl acetate; semi-volatile organic compounds; metals (primarily lead, mercury, and zinc), and asbestos. Based on site investigation activities conducted at the site, small quantities of broken tile are present on the western part of the Site where manufacturing took place. The eastern portion of the Site is unpaved, and waste floor tile was reportedly disposed in this area. The Workplan was submitted on April 2, 2021 to present the proposed scope of work and estimated schedule to remediate subsurface asbestos-containing soil and tile chips by excavation and off-site disposal in preparation for future redevelopment of the Site. Based on DTSC's review of the Workplan, DTSC recommended that additional samples be collected in several areas prior to conducting the removal action. Armstrong and the State of California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) entered into a Corrective Action Consent Agreement (CACA) under which Armstrong agreed to investigate potential releases of hazardous materials at the site under the oversight of DTSC. A Human Health Risk Assessment (HHRA) was performed to evaluate the potential risks to current and future commercial workers at the Site and to residents north of the Site due to the vapor intrusion pathway based on soil vapor samples collected at the Site (Appendix D). The HHRA was performed using results of soil vapor sampling conducted at the Site in 2020 and 2021. The HHRA evaluated potential exposures for current/future onsite commercial/industrial workers, current offsite residents, and hypothetical future onsite residents. The hypothetical future onsite resident scenario was used to be conservative, although the Site will remain commercial/industrial use for the foreseeable future.	**Conclusions:** The analysis indicated that the project's implementation would not result in any significant adverse impacts with the implementation of the following recommendations: • The project Applicant must continue completing investigations and monitoring activities requested by DTSC. • Prior to redevelopment, any remaining asbestos-containing soil and floor tile must be remediated by excavation and off-site disposal. This work will need to be completed under the direction of the DTSC and SCAQMD, and in accordance with any pertinent requirements. The excavation, loading, and transportation of the impacted soil is assumed to be completed over a 76-day period (16 weeks) at a rate of approximately 400 yd3 per day (approximately equivalent to 600 tons per day). • Prior to finalizing demolition, ACBMs must be removed by a State-licensed contractor. A comprehensive LBP survey should be completed to determine whether LBP is present. If present, LBP should be stabilized prior to demolition. • Due to the historical industrial use, a Soil Management Plan (SMP) must be prepared and implemented during redevelopment activities to address potential soils contamination. • Although there is a low likelihood that VOCs in soil vapor will present a human health risk through vapor intrusion, Future buildings must be constructed with vapor control systems (e.g., vapor barrier) for precautionary measures. • Groundwater monitoring wells and soil vapor probes may be removed with concurrence by DTSC. These need to be protected for future monitoring if DTSC closure has not been obtained before redevelopment.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Hazards & Hazardous Materials Impacts (Continued)		
On-site groundwater flow direction has been variable over the past year, although generally flows in a south to southwesterly direction. The majority of the asbestos buried on-site is in the form of a non-friable tile chip, however, friable asbestos in discrete soil cannot be completely ruled out. Based on the review of these data, there are four discrete areas on the site with non-friable asbestos containing tile chips and/or friable asbestos containing soil (designated as "Areas 1, 2, 3, and 4"). Areas 1, 2, and 4 are located within the western portion of the site and were the result of accidental spillage of tile chips at times when these areas were unpaved. Investigations in Areas 1, 2, and 4 have shown sporadic tile chips ranging in depth from surface to approximately 2 feet. Area 3 is located in the eastern portion which was used to historically dispose of tile chips. The tile chips were reportedly disposed of on this parcel and spread to the eastern portion of the lot. As would be expected, investigations have shown a continuous layer of tile chips at shallow depths in the eastern portion of the site, with sporadic chips in deeper depths. Based on investigations completed in this area of the site, tile chips have been identified in a small swatch of land along the eastern property line at depths of up to 3 feet bgs. Asbestos containing soil and tile chips would be considered an REC. It should be noted that surficial chips were also noted east of the site, between the eastern property line and the Los Angeles River. Remediation of these soils will also need to be completed with the approval of the adjacent property owner. Based on previous asbestos surveys, ACBMs have been identified at the site. Based on the date of construction of some of the remaining on-site buildings such as the guard shack, lead-based paint (LBP) may also be present.	Potential human health risks were evaluated by comparing the maximum concentrations detected at each sample location and at each sample depth. The results of this HHRA indicate that vapor intrusion cumulative cancer risks and noncancer hazards for current/future commercial/industrial workers exceed the target risk levels at several locations when using the conservative EPA default AF of 0.03. In contrast, only one location (SVP10) had a cumulative cancer risk exceeding the target risk of 1×10-5 commonly used for managing commercial/industrial sites in California based on the DTSC 2011 default AF 0.001. And although the cumulative risks at SVP-10 for the deeper samples (at 15, 30, and 45 ft bgs) were slightly above 1×10-5 , the cumulative risk for the shallow (5 ft bgs) samples at SVP-10 were below 1×10-5 . Additionally, the adjacent building is a large, poorly sealed, corrugated metal walled warehouse with windows, doors and vents that are open to the outdoors during operations. The planned installation of vapor intrusion mitigation measures (e.g., a vapor barrier) during future construction will result in even lower estimated risks. Therefore, it is unlikely that VOC concentrations in soil vapor at the Site would pose a health risk to current or future onsite workers.	**Mitigation Measures:** The following mitigation measure would be required to reduce the project's potential impacts related to potential hazardous materials impacts: *Hazards and Hazardous Materials Mitigation Measure No. 1.* The project Applicant must continue completing investigations and monitoring activities requested by DTSC. *Hazards and Hazardous Materials Mitigation Measure No. 2.* Prior to redevelopment, any remaining asbestos-containing soil and floor tile must be remediated by excavation and off-site disposal. This work will need to be completed under the direction of the DTSC and SCAQMD, and in accordance with any pertinent requirements. *Hazards and Hazardous Materials Mitigation Measure No. 3.* Prior to finalizing demolition, ACBMs should be removed by a State-licensed contractor. A comprehensive LBP survey shall be completed of the remaining buildings (such as the guard shack) to determine whether LBP is present. If present, LBP should be stabilized prior to demolition. *Hazards and Hazardous Materials Mitigation Measure No. 4* Due to the historical industrial use, a Soil Management Plan (SMP) must be prepared and implemented during redevelopment activities to address potential soils contamination. *Hazards and Hazardous Materials Mitigation Measure No. 5.* Although there is a low likelihood that VOCs in soil vapor will present a human health risk through vapor intrusion, Future buildings must be constructed with vapor control systems (e.g., vapor barrier) for precautionary measures. *Hazards and Hazardous Materials Mitigation Measure No. 6.* Groundwater monitoring wells and soil vapor probes may be removed with concurrence by DTSC. These need to be protected for future monitoring if DTSC closure has not been obtained before redevelopment. **Significance after Mitigation:** Less than significant with mitigation.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Hydrology & Water Quality Impacts		
The project site is underlain by Holocene-age alluvial deposits consisting of silt, clay, and discontinuous lenses of sand. These sediments represent river system deposits derived from the ancestral Los Angeles and Rio Hondo Rivers. The Upper Pleistocene-age Lakewood Formation consists predominantly of fine-grained silt and clay while the lower portion of the Lakewood formation contains greater percentages of sand with some gravel lenses. The Lower Pleistocene-age San Pedro Formation extends from a depth of approximately 275 to 1,200 feet below ground surface (bgs) and consists of marine and continental gravel, sand, sandy silt, silt, and clay. Water supply in the city is derived from local groundwater wells operated and maintained by the California Water Service Company and imported water from the Metropolitan Water District (MWD). The regional ground water flow direction is to the west (LA-DPW, *Coastal Plain Deep Aquifer Groundwater Contour Map for Fall of 1994).* In the existing condition, the majority of the site is paved and was previously over as an industrial plant. The former manufacturing building has been demolished and the site is now undeveloped land. There is a well-defined vegetated swale, which appears to drain the site. The swale accepts runoff from the project site and conveys south, then southeasterly towards the southeast corner of the site. The swale dead ends near the southeast corner. The runoff must pond up then it spills out into the landscape strip paralleling the Los Angeles River. This landscape strip has a headwall with a 24" storm drain which collects the runoff from the site, from the northern portion of the railroad right of way, and the landscape strip west of the Los Angeles River. The total 50-year peak flow rate from the site including the offsite runoff tributary to the 24" pipe downstream is approximately 21.5 cfs. (20.0 cfs. + 1.5 cfs.). which is less than the allowable discharge (27.1 cfs). Therefore, runoff from the site at proposed condition does not adversely affect the runoff discharge that drains to the existing 24" pipe downstream.	Title 6 – Health and Sanitation, Chapter 6.67 – Storm Drains of the City of South Gate Municipal Code regulates the discharge of stormwater within the City. According to the aforementioned chapter, the project Applicant shall submit an LID plan to the department of community development prior to the submittal of an application for the first planning or building approval for a new planning The project applicant will be required to prepare a LID plan which implements set LID standards and practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal NPDES permit on the plans and permit application submitted to the City. The site is proposed to be developed with a single warehouse type building. There will be a truck yard along the east and south sides of the building, vehicle parking will be along the west and north of the building. The runoff will be collected in a series of catch basins. The site is being developed with a single warehouse type building. The runoff will be collected in a series of catch basins. The storm drain will convey the runoff towards the southeast corner of the site. The 50-year storm event flow rate for the site is approximately 65 cfs. which is higher than the allowable condition (27.1 cfs.). Detention is required onsite to limit discharge from the site. An offsite runoff (Area 1C 1.85 acres) north of the site will drain easterly and traverses south to a proposed swale adjacent to the easterly property and conveyed to an 24" pipe southeast of the site and ultimately discharged to Los Angeles River. The 50-year peak flow rate at this location is approximately 1.5 cfs. undetained. Adherence to the construction BMPs identified in the Low Impact Development (LID) will reduce potential construction related impacts to levels that are less than significant. These BMPs may include but not be limited to the use of bioswales, bioretention areas, organic filters, and sandbags to control water velocity. The implementation of the proposed project will not result in a violation in water quality standards or discharge requirements because the project Applicant will be required to implement the construction and operational Best Management Practices (BMPs) identified in the mandatory LID plan. As a result, the potential impacts are considered to be less than significant.	**Conclusions:** The analysis determined that adherence to the construction BMPs identified in the Low Impact Development (LID), will reduce potential construction related impacts to levels that are less than significant. Furthermore, the implementation of the proposed project will not result in a violation in water quality standards or discharge requirements since the project Applicant will be required to implement the construction and operational BMPs identified in the mandatory LID plan. As a result, the potential impacts are considered to be less than significant. **Mitigation Measures:** No additional mitigation is required beyond the adherence of Title 6 – Health and Sanitation, Chapter 6.67 – Storm Drains of the City of South Gate Municipal Code regulates the discharge of stormwater within the City. The project applicant will be required to prepare a LID plan which implements set LID standards and practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal NPDES permit on the plans and permit application submitted to the City. **Significance after Mitigation:** The impacts would be less than significant.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Land Use Impacts		
The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum floor tiles. The facility employed approximately 140 full time equivalent staff when the business was operational. The Armstrong facility comprised of approximately 220,000 square feet under roof while manufacturing operations were conducted in a two-story building occupying approximately 120,000-square feet of floor space. The manufacturing and warehouse operations (approximately 54,000-square feet) were conducted within the same building, which is comprised of several building additions constructed over time. Additional structures on site consisted of an approximately 5,000-square foot office building and a small boiler house located to the north of the manufacturing building. All of these structural improvements have been demolished. The only remaining structural improvements located wthin the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site. Historic aerial photographs show that the project site contained structures on the western half of the project site dating back to 1954. The project site has no street frontage and has a single point of ingress and egress that is located at the eastern terminus of Patata Street. The project site is currently zoned as Heavy Manufacturing (M-3)and is designated as Heavy Industrial in the General Plan. The M3 zone district permits a wide range of heavy industrial land uses and is intended to implement the manufacturing distribution place type designation of the general plan. This zone includes uses such as industrial, manufacturing, large-scale warehouse, distribution, or logistics facilities. The heavy manufacturing M3 zone is intended to provide a setting for the most intensive industrial and manufacturing activities, providing an employment and export base for the community. Heavy industrial activities are intended to be the primary land use in this zone, and should be designed to protect the productivity of the industrial activities and minimize impacts on surrounding uses. Finally, the M3 zone is intended to implement, and is consistent with, the manufacturing/distribution place type designation of the South Gate General Plan.	The proposed project would consist of 451,593 square feet. This floor area would include 435,420 square feet for the main building and a 16,173 square foot truck maintenance building. building The former Armstrong manufacturing facility consisted of approximately 394,000 square feet of floor area in the main buildings. These former improvements have been demolished and will be replaced by the proposed project. The proposed project will occupy the site that was formerly occupied by the former Armstrong plant. The proposed project will be confined to the current property and, as a result, the project would not divide an existing community. The analysis determined that the proposed project would not result in a significant environmental impact related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	**Conclusions:** The analysis determined that the proposed project would not result in a significant environmental impact related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **Mitigation Measures:** No mitigation measures are required. **Significance after Mitigation:** No impacts would result.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Mineral Resources Impacts		
According to the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder, there are no existing or former oil wells and/or mineral extraction activities located within the project site	There are no mineral, oil, or energy extraction and/or generation activities are located within the project site. As a result, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.	**Conclusions:** The project's implementation would not result in any impact related to mineral extraction activities. As a result, no impacts would occur. **Mitigation Measures:** No mitigation measures are required. **Significance after Mitigation:** No impacts would result.
Noise Impacts		
To characterize the existing noise environment, a series of onsite noise measurements were taken during a weekday period (Monday, June 27) at two locations. The noise measurements were taken during the late afternoon (5:30 PM) and night-time (9:00 PM) periods. An *Extech Model 407730* Digital Sound Meter was used to conduct the noise measurements. A series of 100 discrete intervals were recorded at two separate locations (referred to herein as Location 1 and Location 2). Location 1 was located in the southern portion of the site and Location 2 was positioned within the central portion of the site. The measurements were captured five feet above the ground surface. The measurements taken at Locations 1 and 2 were collected free from any obstructions. The measurements were taken on a Wednesday morning at 9:45 AM. As indicated previously, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. The average noise levels during the measurement period were 66.5 dBA for Location 1 and 60.5 dBA for Location 2. The ambient noise environment was relatively quiet given the site's undeveloped character. The ambient noise environment was dominated by machinery noise from the nearby Shultz Steel facility and a business located to the northwest of the site. Traffic noise from Atlantic Avenue, the adjacent roadways, and overflying aircraft were secondary sources of noise. Backup alarms from equipment at Shultz Steel were a continuous source of noise during the daytime period. Compressor noise from the nearby truck yard was the dominant and continuous noise source at location 2.	During the building construction phases, relatively high groundborne noise levels noise levels would be generated by the operation of heavy-duty trucks, backhoes, bulldozers, excavators, front-end loaders, scrapers, and other heavy duty construction equipment. Point sources of noise emissions are attenuated by a factor of 6 dBA per a doubling of distance from the noise source. The construction noise thresholds were taken from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment. A significant construction noise threshold impact if construction noise exceeds 80 dBA at a sensitive receptor. These noise levels could intermittently occur for a few days when construction equipment is operating closest to the residential uses. The remainder of the time, the construction noise levels would be much less because the equipment would be working further away from the existing sensitive uses. A reference noise level measurement for cold storage loading dock activities was collected to represent the truck idling/reefer activity at a neighboring receiving dock next to the offices of Blodgett Baylosis Environmental Planning. The truck idling activity reference noise level measurement was taken adjacent to the parking position with a direct line of site. During the measurement period, the recorded noise levels were 65.2 dBA dBA at a uniform distance of 50 feet. This represents a worst case since the line of sight between the proposed project's loading docks and the homes will be obstructed by the new building. In addition, the distance between the receiving area and the homes will be at least 200 feet with no direct line of sight.	**Conclusions:** The analysis determined that during construction phases, mitigation would be required to reduce construction noise levels. The analysis determined that the proposed project's operational noise impacts would require mitigation to address roof top equipment and after hour truck movements along the north side of the building. **Mitigation Measures:** The following mitigation measures focus on ways to further reduce construction noise levels at the nearest sensitive receptors so that the impacts would be less than significant: •*Noise Mitigation Measure No. 1.* Construction staging areas must be located within the southern portion of the project site, at least 500 feet east of the project site's northern boundary away from the noise sensitive receptors. •*Noise Mitigation Measure No. 2.* The use of Tier IV rated construction equipment must be used during demolition, site preparation, and construction activities. •*Noise Mitigation Measure No. 3.* The Applicant must notify local residents regarding construction times and local contact information by placing a notice in the form of a sign alongthe project site's boundaries in prominent locations. •*Noise Mitigation Measure No. 4.* Construction shall be prohibited from taking place between the hours of eight p.m. and seven a.m. on weekdays, including Saturday, or at any time on Sunday or a federal holiday.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Noise Impacts (Continued)		
		•*Noise Mitigation Measure No. 5.* All building equipment located on the roof areas (air conditioning, compressors, and other stationary noise sources) shall be fully enclosed. •*Noise Mitigation Measure No. 6.* Truck traffic will not be permitted to use the drive aisle located to the north of the new building between 7:00 PM and 7:00 AM. **Significance after Mitigation:** No impacts would result.
Population & Housing Impacts		
The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum floor tiles. The Armstrong facility comprised of approximately 220,000 square feet under roof while manufacturing operations were conducted in a two-story building occupying approximately 120,000-square feet of floor space. When the facility was operational, it employed 140 full-time employees. The project site is currently zoned as Heavy Manufacturing (M-3)and is designated as Heavy Industrial in the General Plan.	No housing units are located within the project site. The former Armstrong manufacturing facility consisted of approximately 394,000 square feet of floor area in the main buildings. These former improvements have been demolished and would be replaced by the proposed project. The proposed project will occupy the site that was formerly occupied by the former Armstrong plant. The proposed improvements will be confined to the current property. Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Based on the analysis, the proposed project would not result in any growth inducing impacts. As a result, no impacts would occur.	**Conclusions:** The proposed project's implementation would not result in any growth-inducing impacts. As a result, no impacts would occur. **Mitigation Measures:** No mitigation measures are required. **Significance after Mitigation:** No impacts would result.
Population & Housing Impacts		
The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum floor tiles. The Armstrong facility comprised of approximately 220,000 square feet under roof while manufacturing operations were conducted in a two-story building occupying approximately 120,000-square feet of floor space. When the facility was operational, it employed 140 full-time employees. The project site is currently zoned as Heavy Manufacturing (M-3)and is designated as Heavy Industrial in the General Plan. There are no housing units located within the project site. No such uses are permitted under the site's current zoning	The Armstrong facility employed 140 full-time employees when it was operational. As indicated previously, the proposed project is anticipated to employ between 250 and 300 persons once it is operational. It is also important to note that the City's current unemployment rate as of July 2022 is 5.3% which means that 2,200 persons are actively seeking work. As a result, there are more than adequate numbers of local members of the lo0cal workforce available to meet the anticipated employment demand for the proposed project. Based on the above analysis, the proposed project would not result in any growth inducing impacts. As a result, no impacts would occur.	**Conclusions:** There are no housing units on-site and, as a result, no displacement impacts would result. **Mitigation Measures:** No mitigation measures are required. **Significance after Mitigation:** No impacts would result.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Public Service Impacts		
The Los Angeles County Fire Department (LACFD) provides fire protection and first responder emergency medical services to the City of South Gate. There are two fire stations within the City of South Gate in close proximity to the project site. Fire Station 54 is located at 4867 Southern Avenue and is staffed at all times by one captain, one engineer, one firefighter, and three paramedics. This station is located approximately 1.0 miles from the site. Fire Station 57 is located at 5720 Gardendale Street, and is staffed by one captain, one engineer and two firefighters. A battalion chief oversees both fire stations. This station is located approximately 4.1 miles from the project site. According to the South Gate General Plan, there are 35 fire department personnel distributed over three shifts. The average response time is 4 minutes and 58 seconds for emergency calls, and 7 minutes and 6 seconds for non-emergency calls. The average response times for the LACFD Countywide for EMS calls is 7 minutes, 13 minutes and 5 mnutes,23 seconds for structural fires. The South Gate Police Department (SGPD) provides law enforcement services in the City of South Gate. The Department operates out of its headquarters at 8620 California Avenue, as well as a substation in the El Paseo Shopping Center. The Police Station is located approximately 1.5 miles to the west of the site. The City is considering a "City Hall Annex" to include a Police Department substation adjacent to the proposed Gateway Development near the intersection of Atlantic Avenue and Firestone Boulevard. The According to the South Gate General Plan, the SGPD has 97 sworn officers, including 1 chief, 3 captains, 5 lieutenants, 11 sergeants and 77 police officers. Currently, the ratio of police per thousand people is 0.9. The national average target staffing ratio is 2.0 officers per thousand. The SGPD has a goal of achieving a ratio of 1.0 officers per thousand residents. The Department also has 45 unsworn positions, which includes administrators, dispatchers, and public safety officers. Approximately 30,000 students attend some type of educational facility in the City. The City and the project site are located within the attendance boundaries of the Los Angeles Unified School District. The nearest school campus to the project site is Park Elementary School located in the City of Cudahy. This campus is located approximately 700 feet to the north of the project site.	Once occupied, the proposed use may result in an incremental increase in calls for service. This increased demand is due to the introduction of more occupants The Armstrong facility employed 140 full-time employees when it was operational. As indicated previously, the proposed project is anticipated to employ between 250 and 300 persons once it is operational) onto the site upon project completion. Under CEQA, service demand in and of itself does not constitute an environmental impact unless such demand causes a physical change to the environment. The increase in occupants (250 to 300 new employees) on the site is not anticipated to result in an increase in demand for fire protection services high enough to trigger the need to physically construct new fire protection facilities given that the new facility would replace an older obsolete plant facility. As a condition of City approval, the development project would be required to meet all access, water, and fire protection system requirements, per the Building Code, and the California Fire Code as well as all other applicable City Codes. The development site would be designed in compliance with the City of South Gate Building Code, which adopts by reference the CBSC. The CBSC includes emergency access requirements which would minimize site safety hazards and potential operational impacts to police services. The increase in the commuting workforce associated with the new warehouse could result in increased vehicle accidents, calls for emergency medical service, and reported crimes in the area, all of which may lead to an increase in the demand for police services on the site and in the surrounding area. Under CEQA, service demand in and of itself does not constitute an environmental impact unless such demand causes a physical change to the environment. There is no aspect of the project's design or operation that would result in the need to construct new school facilities Pursuant to Government Code Sections 65995.5– 65998, school districts may collect fees to offset the costs associated with increasing school capacity. The provisions of SB-50, by statute, the payment of a statutory fee by developers serves as the total mitigation of the potential impact of a development on school facilities pursuant to CEQA.	**Conclusions:** The analysis determined that the proposed project's implementation the impacts would be less than significant related fire protection, law enforcement, schools, or other public facilities. **Mitigation Measures:** No mitigation is required. **Significance after Mitigation:** Less than significant Impacts.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Transportation Impacts		
The project site provides its access via three truck routes: Patata Street, Atlantic Avenue, and Firestone Boulevard. • *Patata Street* is an east- westerly truck route with one lane in each direction. On-street parking is permitted except near the intersection with Atlantic Avenue. The posted speed limit is 35 mph. • *Atlantic Avenue* has three northbound lanes and two southbound lanes, separated by raised medians. Multiple left-turn lanes are provided at major intersections along with on-street parking. Atlantic Avenue has been identified as a truck route within City of South Gate boundaries. The posted speed limit is 35 mph. South Gate General Plan 2035 has identified in the Implementation Actions that Atlantic Avenue should be widened from four lanes to six lanes throughout the City. • *Atlantic Avenue* has two lanes in each direction separated by painted islands and two-way-left-turn lanes. The posted speed limit is 35 mph in the project vicinity. On-street parking is generally permitted for both approaches on Atlantic Avenue south of Firestone Boulevard. Onstreet parking is permitted on Atlantic Avenue for the northbound approach only between Mason Street and the railroad tracks with the following restrictions: No parking Proposed 10 from 3 PM to 6 PM Monday through Friday; 20-minute parking from 9 AM to 3 PM Monday through Friday. Within the City of Cudahy, on-street parking is generally permitted on Atlantic Avenue for the southbound approach only. • *Firestone Boulevard* is separated by raised medians. This roadway is a designated truck route. The speed limit is 35 mph in the project vicinity. South Gate General Plan 2035 has identified in the Implementation Actions that Firestone Boulevard should be widened to a minimum of eight lanes (excluding left turns) between Atlantic Avenue and Garfield Avenue. On-street parking is permitted for both approaches on Firestone Boulevard between Atlantic Avenue and the railroad.	Passenger vehicle trips are estimated utilizing the rates and methodologies outlined in "*Trip Generation, 11th Edition*", published by the Institute of Transportation Engineers (ITE). Truck trips generated by the project are converted into passenger car equivalents(PCE) utilizing the methodology of Recommended Large Truck Mix Percentages as provided in the "*City of Fontana Truck Trip Generation Study*", which is the widely accepted by most transportation authorities in Southern California. With the application of PCEs, the project is expected to generate 82 inbound and 23 outbound trips in the AM peak hour, 31 inbound and 81 outbound trips in the PM peak hour, and 2,002 daily trips. The proposed project, a high cube storage warehouse (ITE Code 157) represents a maximum worst case, compared to a conventional warehouse (ITE Code 150). The total daily trip rate for a high cube storage warehouse used in Table 3-16 was 2.12 trips per 1,000 square feet of floor area compared to 0.19 trips per day for a conventional warehouse. Traffic volumes at the study intersections for existing conditions plus project are shown in Exhibits 3-14 and 3-15,respectively. The level of service and delays are shown in Table 3-15. The analysis worksheets can be found in Appendix C of the Traffic Study. All study intersections operateat LOS D or better in the AM and PM peak hours except for the following intersection: • Atlantic Ave at Patata St/Salt Lake Ave (#6): LOS F in the PM peak hour • Atlantic Ave at Firestone Blvd (#8): LOS E in the AM and PM peak hour • Firestone Blvd at Rayo Ave (#12): LOS E in the AM and PM peak hour Project traffic is expected to result in an operational deficiency at the following intersection: #6 Atlantic Avenue at Patata Street / Salt Lake Avenue in the PM peak hour.	**Conclusions:** Operational deficiency analysis based on opening year (2024) conditions in the AM and PM peak hours are shown in Tables 3-18 and 3-19, respectively. Project traffic is expected to result in operational deficiency at the following intersection: #6 Atlantic Avenue at Patata Street / Salt Lake Avenue in the PM peak hour. **Mitigation Measures:** The following mitigation measures are recommended: Intersection (#6) of Atlantic Avenue and Patata Street / Salt Lake Avenue: • Re-stripe Salt Lake Avenue for the eastbound traffic to provide a shared right-thru-left turn lane and an exclusive right-turn lane. • Re-stripe Patata Street for westbound traffic to provide a shared right-thru-left turn lane and an exclusive left-turn lane. **Significance after Mitigation:** No significant impacts would occur upon implementation of the mitigation.

The Gabrieleño ethnographic accounts of Native Americans indicate that the Gabrieleño once occupied the region that encompasses the project area. At the time of contact with Europeans, the Tongva were the main occupants of the southern Channel Islands, the Los Angeles Basin, much of Orange County, and extended as far east as the western San Bernardino Valley. The term "Gabrieleño" came from the group's association with Mission San Gabriel Arcángel, established in 1771. However, today the group prefers to be known by their ancestral name, Tongva. The Tongva are believed to have been one of the most populous and wealthy Native American tribes in Southern California prior to European contact, second only to the Chumash. The Tongva occupied numerous villages with populations ranging from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Tongva society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. By the late 18th Century, the Tongva population had significantly dwindled due to the introduction of diseases and dietary deficiencies. Tongva communities near the missions disintegrated as individuals succumbed to Spanish control, fled the region, or died. Later, many of the Tongva fell into indentured servitude to Anglo-Americans. By the early 1900s, few Tongva people had survived and much of their culture had been lost though by the 1970s, a revival of the Tongva culture began which continues today with growing interest and support.	In accordance with CEQA Guidelines, the site was assessed for the project's potential for an adverse impact on known and potential cultural resources at the project site. Results from the SCCIC indicate that two recorded historic resources are within the 0.5-mile search radius of the project site, none of which are located within the project boundaries. Of the seven area-specific survey reports on file within the 0.5-mile radius; one report (LA-11993) addresses the project site, and two reports (LA-08255 and LA-04834) are immediately south of the project boundaries. This indicates that the project site has previously been surveyed for cultural resources. No additional cultural resources were identified within the project site boundaries. The NAHC Sacred Lands File search reported negative results for Native American cultural resources. On August 12, 2021, FCS sent a request to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response was received on October 12, 2021, indicating that the Sacred Lands File search failed to locate the presence of Native American cultural resources within the project site. The NAHC included a list of eight tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by implementation of the proposed project are addressed, a letter containing project information and requesting additional information was sent to each tribal representative on October 15, 2021 pursuant to the requirements of AB-52. One response was received on October 15, 2021, from the Gabrieleño Band of Mission Indians-Kizh Nation requesting Lead Agency contact information for the City of South Gate. No additional responses have been received to date and the mandatory 30-3ay consultation period has expired. Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, the survey considered the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be low to moderate.	**Conclusions:** Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, no impacts on tribal cultural resources would result **Mitigation Measures:** No mitigation is required. **Significance after Mitigation:** No impacts would occur.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Utilities & Service Systems		
The City of South Gate manages and operates wells, conduits, pipes, fire hydrants, and reservoirs. The water system in South Gate is regulated through federal law, state law, the South Gate Municipal Code, and court decisions. The City has a total of 16,218 metered connections. Seventy-six percent of water is used by residential users, ten percent commercial, seven percent industrial, three percent public/institutional, and three percent other users. The City of South Gate uses groundwater from the City wells as its primary source. Water generated from wells is chlorinated and distributed to City customers or stored in reservoirs. The total capacity of both active and stand-by wells is 32.97 million gallons per day (MGD), or 101.19 acre-feet per day. The sewer system is managed by the City's Public Works Department and consists of approximately 120 miles of gravity sewer lines. Nearly all sewer pipelines within the City are made of concrete or vitrified clay. The pipelines range in diameter from 4-inch to 27-inch, with majority 8-inches in diameter. The current sewer system age ranges from 40 years to over 90 years old. Approximately 96 miles of pipeline were relined with cured-in-place piping (CIPP) between 2002 and present. There are approximately 2,400 manholes within the system and no lift stations. Generally, sewer flows within the City flow by gravity from north to south. Approximately 99 percent of local wastewater flows discharge into LACSD facilities for transportation, treatment, and disposal. The remaining one percent of total sewage passes into the City of Paramount system and is then discharged into LACSD facilities The City has a Refuse Collection and Recycling Services Franchise Agreement with Waste Management USA Waste of California, Inc., (Waste Management). A majority of solid waste is disposed at either Class III landfills (municipal solid waste facilities), which are facilities for non-hazardous household waste, or unclassified (inert) landfills that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Waste Management operates a transfer station in South Gate and uses specific landfills for residential and commercial/industrial wastes: Bradley Landfill, Downtown Diversions, Inc., El Sobrante Landfill, Nu-Way Live Oak Reclamation, Inc., Southeast Recovery Resource Facility City of Long Beach-Energy Recovery Bureau, and Synagro Regional Composting Facility.	There are no existing wastewater treatment plants, electric power plants, telecommunications facilities, or natural gas facilities located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. In addition, the increase in demand for water disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required. As a result, no impacts will occur. The proposed project is projected to consume 21,771 gallons of water on a daily basis. The current Citywide annual demand is approximately 6,800 acre-feet per year. The proposed project would consume 24.5 acre feet per year This project consumption represents less than 0.4% the total water consumed Citywide on an annual basis. The proposed project would connect to an existing 16 to 24 inch water main located in Atlantic Avenue or an existing 10-inch water line that extends into the site. Although some minor increase in the demand for domestic water may occur as a result of the proposed development, the increase would not be significant and adequate water supplies and facilities are available to serve the proposed project. The future water consumption does not take into account the previous water consumption rates related to the former use. Even though the demand for water generated by the proposed project will not exceed City water supplies, the proposed project should incorporate features that aim to reduce water consumption on a larger scale. These features would include xeriscape landscaping and water conserving-plumbing fixtures. These measures are required in all new construction as part of the City's Low Impact Development requirements. As a result, the impacts are considered to be less than significant and no mitigation is required.	**Conclusions:** The analysis determined that the proposed project's implementation would not result in any impact with respect to water consumption. As a result, the impacts would be less than significant. **Mitigation Measures:** No mitigation is required. **Significance after Mitigation:** The impacts would be less than significant.

Table 1 1
Summary of Impacts (continued)

Environmental Setting	Impacts	Conclusions
Wildfire Impacts		
The proposed project involves the construction and operation of a new warehouse and manufacturing facility (refer to Section 2.3) within an urban area of the City of South Gate. The proposed project is not located on any lands that are classified as being located within a high fire hazard area. The proposed project would not involve the closure or alteration of any existing evacuation routes. As a result, no impacts will occur.	There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the proposed project will replace dilapidated land cover. As a result, no impacts will occur.	**Conclusions:** The analysis determined that the proposed project's implementation would not result in any impact. **Mitigation Measures:** No mitigation is required since no impacts were identified. **Significance after Mitigation:** No impacts would occur.

Source: Blodgett Baylosis Environmental Planning

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SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed project site is located within the corporate boundaries of the City of South Gate. The City of South Gate is located approximately ten miles southeast of downtown Los Angeles and 13.5 miles north of the port of Long Beach. The City of South Gate is bounded by the cities of Huntington Park, Cudahy, and Bell Gardens on the north; unincorporated Los Angeles County areas to the west; Lynwood and Paramount on the south; and Downey to the east. The location of South Gate in a regional context is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2. The site's latitude and longitude are 33°95'56.75" N, –118° 76°66'29" W.[5] The 27.12-acre project site is located at 5037 Patata Street, within the northeastern portion of the City of South Gate (refer to Exhibit 2-2). The applicable Assessor's Parcel Number (APN) 6224-031-003. A local map is provided in Exhibit 2-3.

The project site is located in the northeastern corner of the City of South Gate that consists of manufacturing and distribution uses. Residential development extends along the northern boundary of the project site within the corporate boundaries of the City of Cudahy. A vicinity map of the project site is provided in Exhibit2-3. The project site is generally bounded by the Los Angeles River along the eastern side, Patata Street and the Union Pacific Railroad (Patata Industrial Leadline) is located to the south, an industrial property and Wilcox Avenue is located to the west, and the aforementioned residential neighborhood is located to the north. Local access to the project site is provided by Patata Street, which connects to Atlantic Avenue, located approximately 0.30 mile to the west of the project site. Atlantic Avenue provides access to I-710 via Firestone Boulevard.

2.2 ENVIRONMENTAL SETTING

The project site is located in the midst of an urbanized area. An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4. Photographs of the project site and the surrounding area are shown in Exhibits 2-5 through 2-10. Surrounding uses in the vicinity of the project site are described below:

- *North of the Project Site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street.[6]

- *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate. A spur track separates the site from the adjacent industrial uses to the south and this line is still active.[7]

[5] Google Maps. Website accessed on February 22, 2022 and Site Surveys conducted by Blodgett Baylosis Environmental Planning.

[6] Google Maps. Website accessed on February 22, 2022

[7] Ibid.

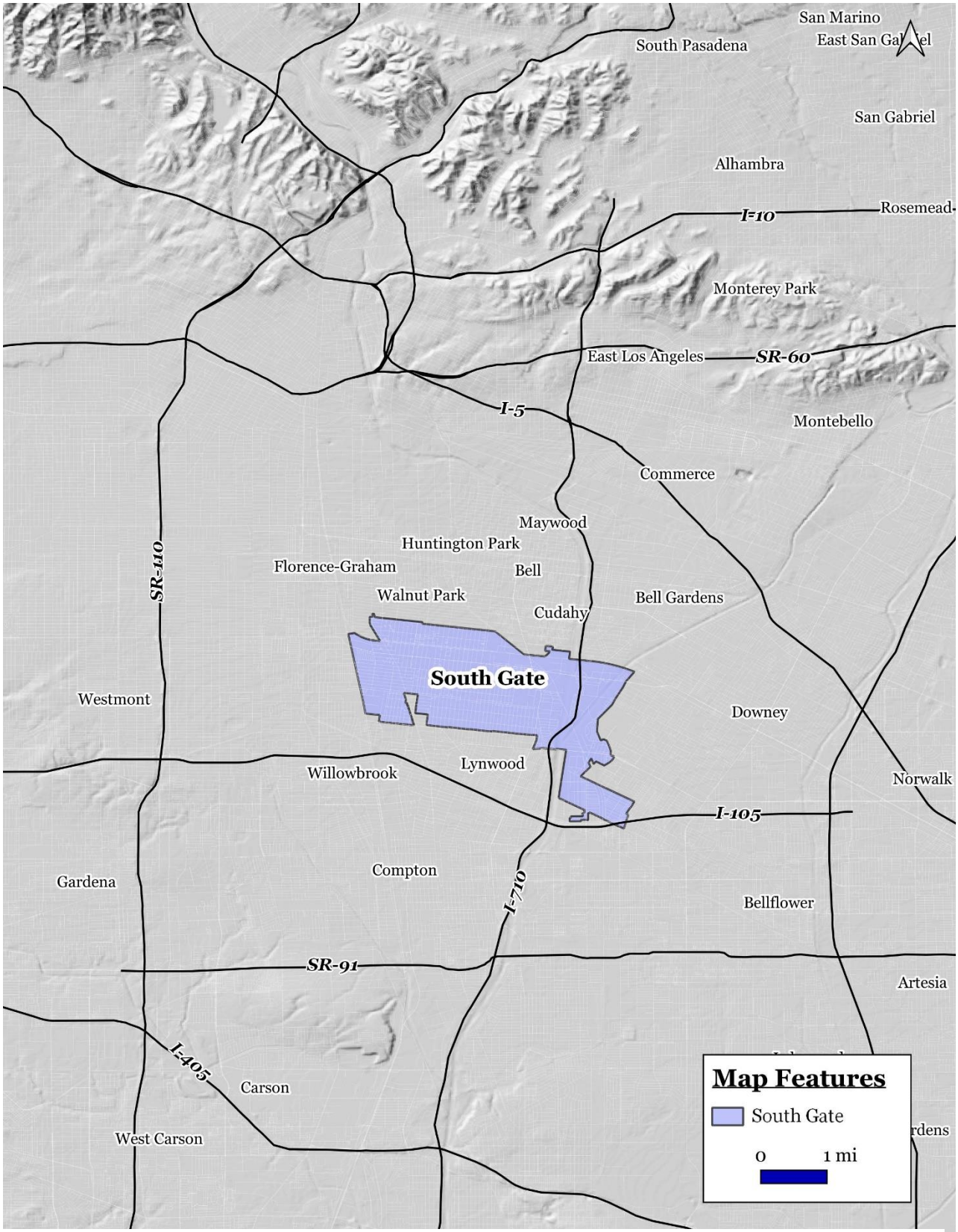


EXHIBIT 2-1
REGIONAL LOCATION

Source: Blodgett Baylosis Environmental Planning

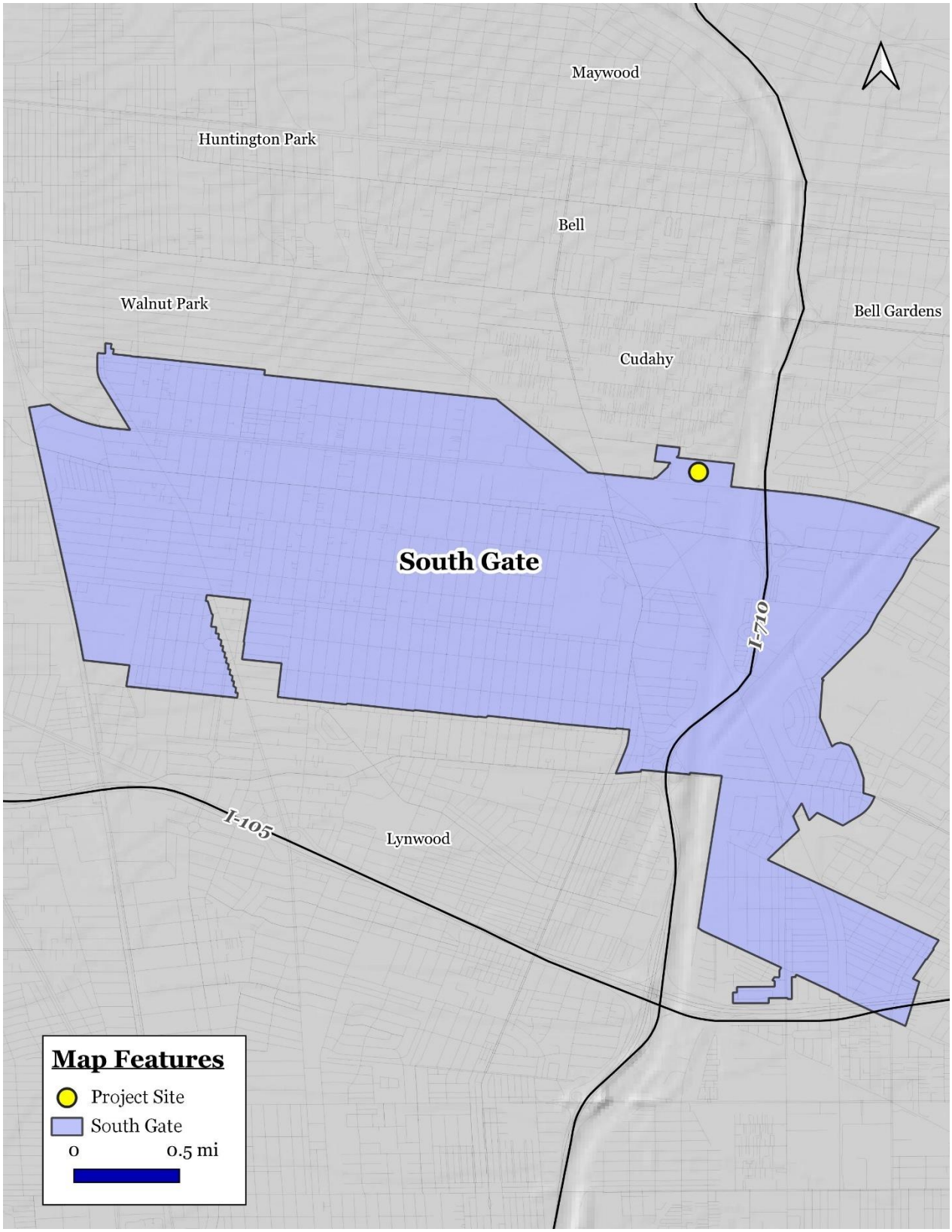


EXHIBIT 2-2
CITYWIDE MAP
Source: Blodgett Baylosis Environmental Planning

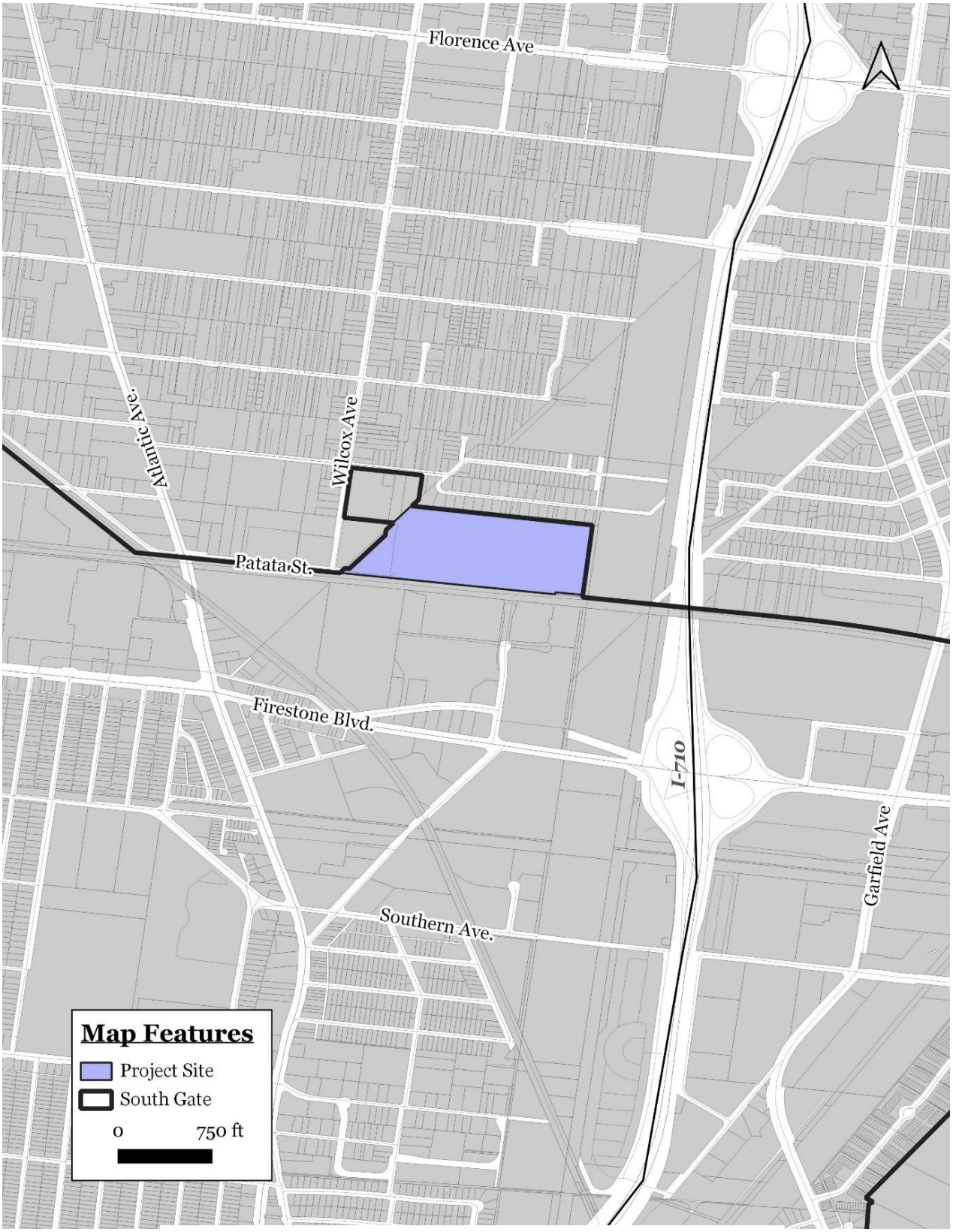


EXHIBIT 2-3
LOCAL MAP

Source: Blodgett Baylosis Environmental Planning

- *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site.[8] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site.[9]

- *West of the Project Site*. Wilcox Avenue generally extends along the project site's west side. Various commercial and industrial land uses are located further west. The Azalea Shopping Center is located along the west side of Atlantic Avenue. An Alta-Med medical office also occupies frontage along the west side of Atlantic Avenue.[10]

The majority of the project site was previously occupied by the former Armstrong World Industries plant with the former improvements having consisted of approximately 239,200 square feet of manufacturing-related floor area. This plant is now closed and there are no operations being conducted at this time. The western portion of the project site was occupied by manufacturing buildings that have since been demolished. The eastern portion of the project site, located next to the Los Angeles River, is vacant and undeveloped. The previous buildings that occupied the project site included a 5,630-square-foot office building, a 216,600-square-foot concrete manufacturing building, and a 16,970-square-foot metal building. The only remaining structural improvements include building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site. Historic aerial photographs show that the project site contained structures on the western half of the project site dating back to 1954.[11] The project site has no street frontage and has a single point of ingress and egress that is located at the eastern terminus of Patata Street.

2.3. PROJECT DESCRIPTION

The site plan is shown in Exhibit 2-11. The key elements of the project area are outlined below:

- *Site Plan*. The project site consists of 27.12-acres or 1,181,347 square feet. The proposed project would have a lot coverage of 35% and a floor area ratio (FAR) of 0.38:1.0.[12]

- *Main Building*. The main building's floor area would be 435,420 square feet and would consist of corporate offices, a warehouse, storage and cooler space, as well as mezzanine space. There would also be a 30,000-square-foot office located in the southwestern corner of the main building. The warehouse portion of the main building would consist of a loading and storage area, a total of 22,000 square feet of 36° cooler storage, and a total of 134,400 square feet of 60° cooler storage.[13] The main building would have two clear heights: 52 feet, 6 inches on the east end and 40 feet on the west end. The parapets vary and would range in height from 50 feet to 60 feet, 6-inches above the finished floor.

Google Maps. Website accessed on February 22, 2022

[9] Ibid.

[10] Ibid.

[11] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

[12] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[13] Ibid.

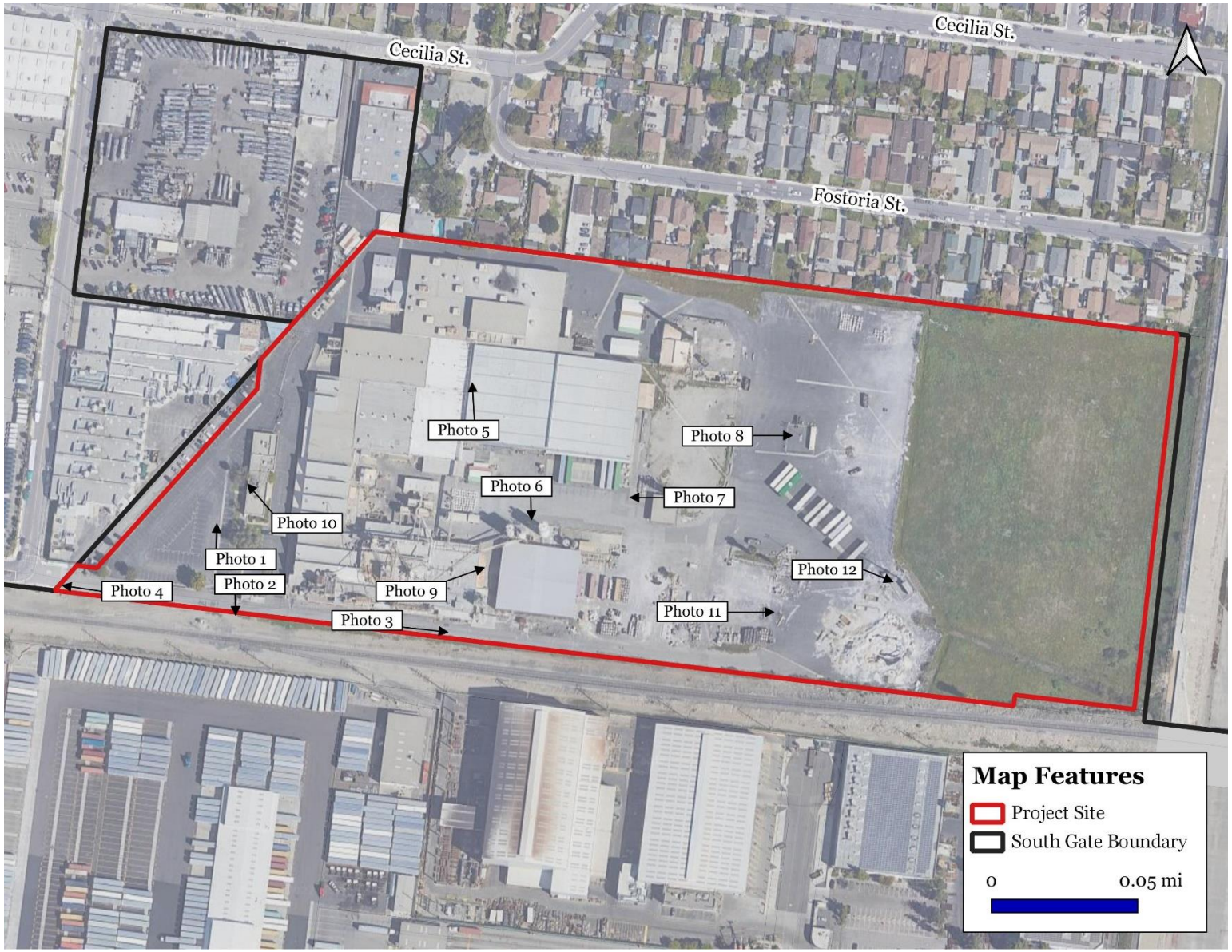


EXHIBIT 2-4
PHOTOGRAPHS LOCATIONS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

Photo 1: Project Site Entrance Facing North

Photo 2: Project Site Entrance Facing South

EXHIBIT 2-5
PHOTOGRAPHS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

Photo 3: Project Site Entrance Facing East

Photo 4: Project Site Entrance Facing West

EXHIBIT 2-6
PHOTOGRAPHS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

Photo 5: Central Project Site Facing North

Photo 6: Central Project Site Facing South

EXHIBIT 2-7
PHOTOGRAPHS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

Photo 7: Central Project Site Facing West

Photo 8: Central Project Site Facing East

EXHIBIT 2-8
PHOTOGRAPHS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

Photo 9: Demolished Armstrong Building Facing Northeast

Photo 10: Demolished Armstrong Building #2 Facing Northwest

EXHIBIT 2-9
PHOTOGRAPHS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

Photo 11: American Tower Corporation Building in southeast portion of Project Site

Photo 12: American Tower Corporation Building (cellular tower) in southeast portion of Project Site

EXHIBIT 2-10
PHOTOGRAPHS OF THE SITE
Source: Blodgett Baylosis Environmental Planning

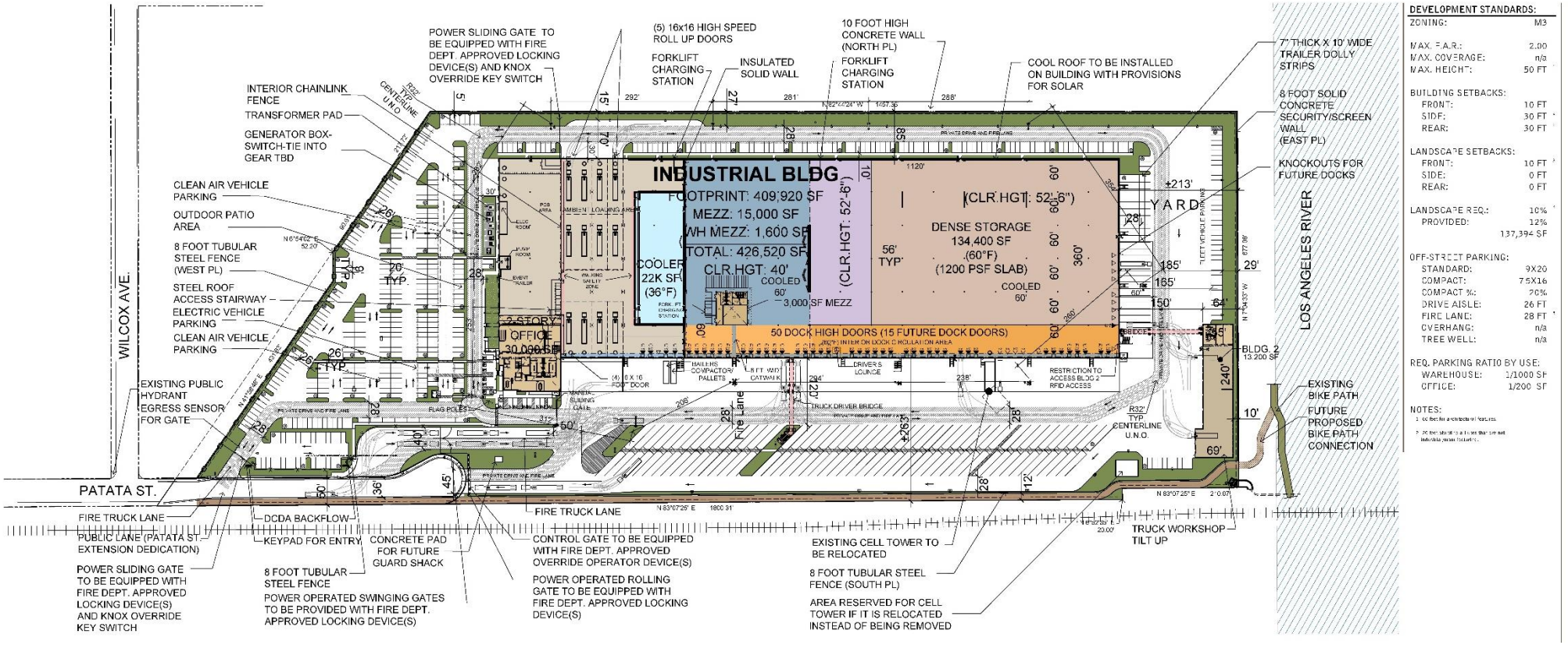


EXHIBIT 2-11
SITE PLAN
Source: Ware Macomb

- *Main Building Loading Docks*. The main building would contain 50 dock-high truck doors, 15 spaces for future dock-high doors (knock-out panels), 11 grade-level truck doors, and nine spaces for future grade-level doors. The loading docks and the truck maneuvering area would be located along the southern and eastern elevations of the main building. In addition, four 16 foot by 16 foot, high speed roll-up doors would be located on the south side to accommodate trucks entering the building while four additional doors would be located on the north side to accommodate exiting trucks.[14]

- *Second Building*. The second, smaller building would consist of 16,173 square-feet of floor area. This building would be truck maintenance workshop that would be located at the southeast corner of the project site. The truck maintenance building would be constructed of pre-engineered metal.[15]

- *Design Characteristics*. The design of the proposed main building is intended to accommodate up to one tenant with corporate offices at the building entry. Potential uses could include light assembly, manufacturing, direct to consumer marketing, warehouse/distribution, e-commerce, and possibly other uses permitted within the City's M-2 zone. These potential uses are considered in the alternatives analysis that evaluates a Warehouse/Distribution Alternative. The 30,000 square-foot, 2-story corporate office component would serve as the main public entrance to the building. The corporate office would be recessed and would consist of glazing with horizontal accents and a canopy. The west-facing office would have a punch storefront glazing to provide variety that complements the main entry. Reveals, accent colors, and shortened accent panels would provide an integrated design for the larger building. In addition to a storefront office, the main building would also include a warehouse mezzanine office totaling 3,000 square feet. The entire building would be equivalent to Leadership in Energy and Environmental Design (LEED™) Certified Silver Core and Shell (the Company is striving for a Gold certification). The proposed industrial building would provide large unobstructed spaces that can accommodate many types of activities and would support changing operations in a changing business landscape.[16]

- *Access and Circulation*. Two driveways would be provided from the extension of Patata Street and at the end of a proposed cul-de-sac at Patata Street, which currently terminates into the property. The eastern end of Patata Street would be extended approximately 550 feet further to the east into the property with an added trail connection to the Los Angeles River and the street would end at the proposed cul-de-sac on the southwestern corner of the project site. [17]

The building elevations are shown in Exhibits 2-12 and 2-13.

[14] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[15] Ibid.

[16] Ibid.

[17] Ibid.

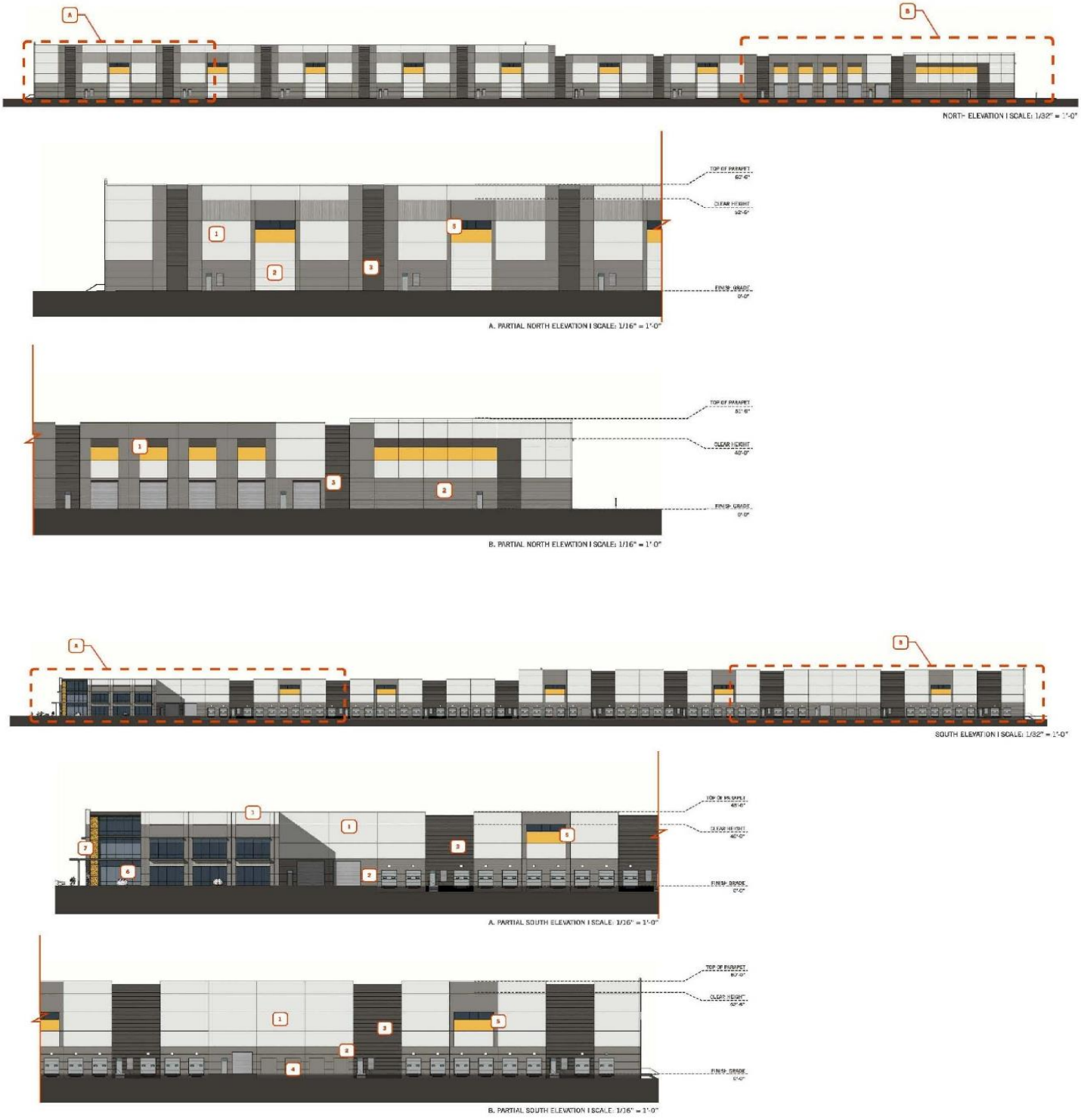
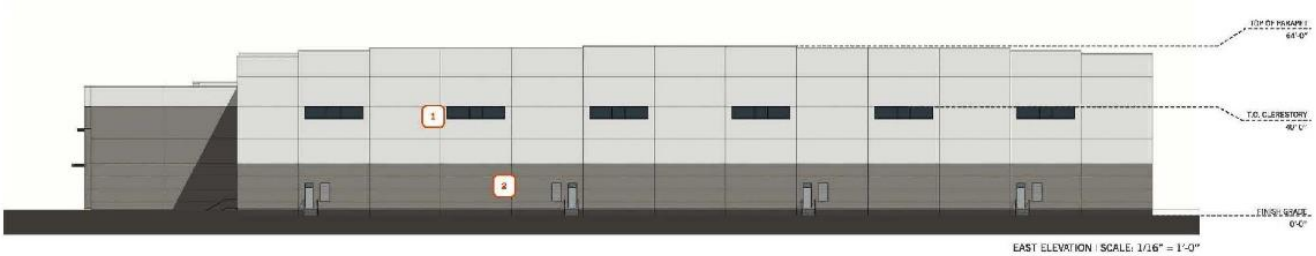


EXHIBIT 2-12
BUILDING ELEVATIONS
Source: Ware Macomb



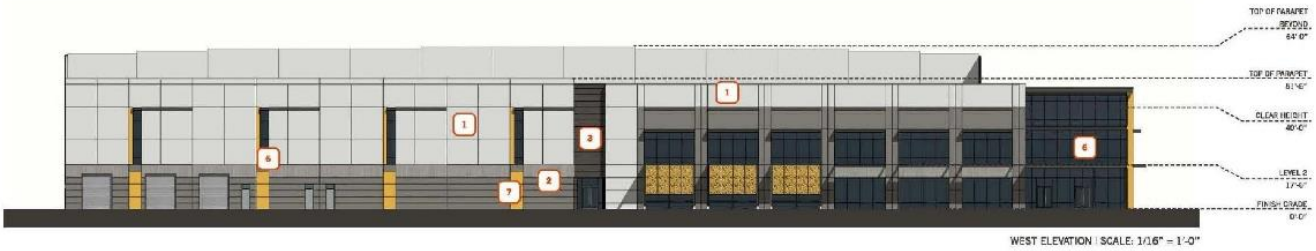


EXHIBIT 2-13
BUILDING ELEVATIONS
Source: Ware Macomb

- *Parking*. Parking would be located within surface parking lots that would surround the proposed main building. The proposed project would accommodate 522 parking stalls, including 10 ADA stalls. (The project's floor area requires 576 stalls for which the applicant will be seeking a variance). Although the project requires 58 EV charging stations for automobiles, 96 EV charging stations will be installed at occupancy and 62 EV charging stations for future zero carbon delivery vehicles. In addition, each dock high loading door would be provided with an electrical source/plug-in installed for EV trucks. Additionally, 69 stalls would be striped for Clean Air Vehicle vanpool/carpool/low-emitting fuel-efficient vehicles. The parking areas would be concentrated on the west side of the project site, with the majority of parking provided near the office and the remainder provided around the perimeter along the north and east property lines. The dock positions and 163 delivery vehicles and trailer stalls would be located on the south side of the main building, providing separation from the residential properties located to the north of the site in the City of Cudahy. In addition, four 16 foot by 16 foot, high speed roll-up doors would be located on the north side for exiting trucks and these truck would be required to make left turns to exit the site to minimize noise. The truck court would be screened due to the project site's natural slope to the south. An additional 28-foot-wide drive aisle would be provided for automobiles while providing trucks to be separated prior to entering the site.[18]

- *Open Space and Landscaping*. Setbacks with landscaping would be provided along the property lines consistent with the Zoning Code.[19] The front building setback would be 10 feet, and the rear and side building setbacks would be 30 feet. The proposed project would provide 137,655 square feet of landscaping, which would be 10 percent of the project site's total land area. Landscaping would be provided around the perimeter of the project site, along the northern and western sides of the main building, and in the parking lots within the western and northern areas of the project site. The proposed landscaping would include varied tree species, shrubs, groundcover, and vines, with drought-tolerant plant species that would be consistent with the surrounding area. A 10-foot screen wall would be provided along the northern property line to create a barrier between the project site and the City of Cudahy residential area. Additionally, the proposed project would include a new bike path connection to the Los Angeles River Trail via the extension of Patata Street to the east, which is located along the western side of the Los Angeles River.[20] The landscape plan is illustrated in Exhibit 2-14.

- *Lighting*. The proposed project would be required to comply with the City's requirements for outdoor lighting. The proposed project's lighting plan would include night lighting for the parking areas, walkways, and driveways. Outdoor lights would be shielded and oriented downward to prevent light trespass and glare. Additionally, no lighting would be directed to the north where residential uses currently exist. The project site lighting would be designed to comply with LEED™, Cal Green, and California Title 24 requirements.[21]

Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[19] City of South Gate. 2015. City of South Gate Comprehensive Zoning Code, 11.24.060 Light and Heavy Manufacturing (M2 & M3) Zones. March. Website: https://www.cityofsouthgate.org/DocumentCenter/View/1183. Accessed July 28, 2021.

[20] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.
[21] Ibid.

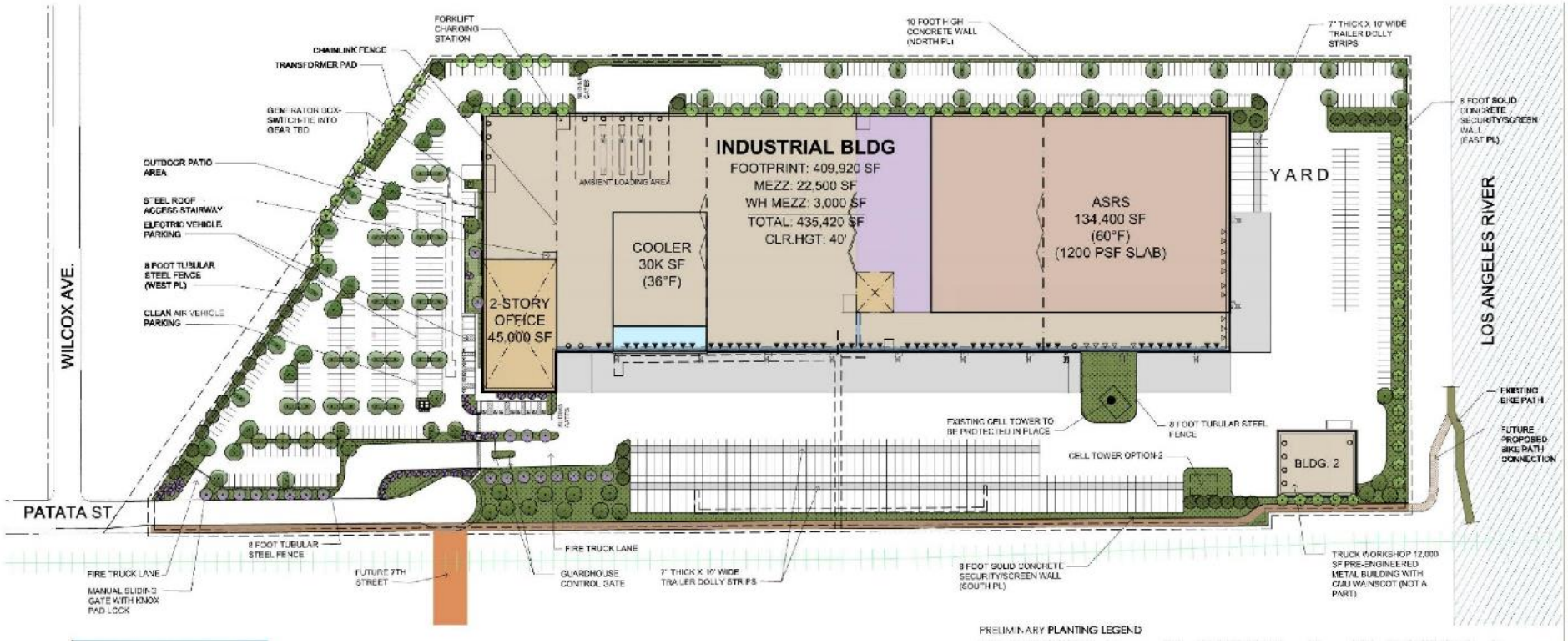


EXHIBIT 2-14
LANDSCAPING PLAN
Source: Ware Macomb

- *Drainage*. The proposed project would include the construction of low impact development (LID) stormwater management systems. The project site would include an interconnected WetlandMod system (at-grade with plants) and one underground 60-inch high-performance (HP) system for stormwater detention.[22]

- *Employment and Operations*. The proposed project would employ between 250 to 300 employees. Once the facility is open for business, operational times would occur Monday through Friday with 70 percent of the proposed project's operations taking place during the daytime and afternoon periods and 30 percent occurring during the evening and night. The proposed project would have limited operations on Saturdays and Sundays.

2.4. PROJECT CONSTRUCTION

The remaining demolition and remediation phases of the proposed project are anticipated to take approximately 6 to 7 months. Construction of the proposed project would take approximately 14 months. The existing cell phone tower on the project site would be protected in place during ongoing site preparation activities. [23] The key construction phases are outlined below:

- *Grading and Remediation*. Construction of the proposed project would result in approximately 52,173 cubic yards of cut, 52,173 cubic yards of fill, and 41,905 cubic yards of over-excavation. A total of 28,660 cubic yards of contaminated soil would be removed from the site, and approximately 100,000 cubic yards of import would be used to replace the contaminated soil. Trucks will be direct loaded while the truck is on hardscape so that cross contamination will be minimal. The average number of round trips planned per day will be a total of 3 round trips for 20 trucks per day for a total of 60 trips per day. The material will be transported to Azusa Special Waste Services.[24]

- *Site Preparation*. The project site would be readied for the construction of the proposed project in this phase. This phase would involve the removal of concrete, trash and vegetation from the development site. Equipment used on-site during this phase would include backhoes, water trucks, haul trucks, and bulldozers. This phase would take approximately one month to complete.

- *Grading*. This phase would involve the grading and excavation of the site and would include the rough and finished grading of the project site. In addition, the building footings, utility lines, and other underground infrastructure would be installed during this phase. Equipment used on-site during this phase would include backhoes, water trucks, haul trucks, graders, trenching equipment, and bulldozers. This phase will take approximately one month to complete.

[22] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[23] Ibid.

[23] Ibid.

[24] Ibid.

- *Construction*. The erection of the main structural improvements would occur during this phase. During this phase, the building floor and walls would be constructed and the water lines, sewer lines, and other infrastructure connections would be completed. Equipment used on-site during this phase would include off-road trucks, cranes, fork-lifts, and compressors. This phase would take approximately nine months to complete.

- *Paving*. The roadways and other hardscape areas would be paved during this phase. Equipment used on-site during this phase would include cement and motor mixers, pavers, rollers, and other paving equipment. This phase would take approximately one month to complete.

- *Landscaping and Finishing*. This phase would involve the planting of landscaping, painting of the units, and the completion of the on-site improvements. Equipment used on-site during this phase would include off-road trucks, backhoes, fork-lifts, and compressors. This phase would take approximately two months to complete.

2.5. DISCRETIONARY ACTIONS

A Discretionary Action is a decision taken by a government agency (for this project, the government agency is the City of South Gate) that calls for an exercise of judgment in deciding whether to approve a project. As part of the proposed project's implementation, the City will consider following discretionary approvals:

- A *Height Variance* to permit the building to exceed 50 feet in certain areas;
- A *Parking Variance* will be requested to allow for a reduction in the number of vehicle parking stalls;
- A *Conditional Use Permit* will be required;
- A *General Plan Amendment* for modifications to the Mobility Element to extend the designated truck routes to the project site;
- A *General Plan Amendment* to change the street designation for Patata Street in order to extend Patata Street at the proposed cul-de-sac on the southwestern corner of the project site;
- The approval of a *Development Agreement* that would limit the City's consideration to a single user with outlined employment and economic benefits to the community; and,

- The *Certification of the Final EIR* along with environmental findings; and,

- The *Adoption of the Mitigation Monitoring and Reporting Program* for the proposed project that is required pursuant to CEQA;

Subsequent ministerial actions (permits) would also be required for the implementation of the proposed project including issuance of grading, building, and occupancy permits. Other agencies may be required to rely on this EIR for future development of the site includes:

- *City of South Gate*. The granting of required demolition permits, grading permits, construction permits, and occupancy permits.

- *Los Angeles Regional Water Quality Control Board*. The granting of required permits and clearances to confirm that all applicable standards, regulations, and conditions for all previous contamination at the site have been met.

- *South Coast Air Quality Management District*. The issuance of permits for refrigeration equipment and all portable construction equipment subject to that rule.

- *California Department of Toxic Substances Control*. Approvals to ensure compliance with State regulations for the generation, transportation, treatment, storage, and disposal of hazardous waste are adhered to will be required.

2.6. PROJECT OBJECTIVES

A clear statement of project objectives allows the analysis of reasonable alternatives to the project, both on- and off-site, that would feasibly implement the basic project objectives while avoiding or substantially lessening the significant effects of the proposed project, which must be analyzed pursuant to CEQA Guidelines Section 15126.6. The project is intended to meet the following objectives:

- *Objective 1:* To facilitate quality development that is consistent with the goals, policies, and objectives of the City of South Gate General Plan.

- *Objective 2:* To realize the City of South Gate's desire to attract high-quality businesses by developing a new warehousing and distribution facility that stimulates employment and that will contribute towards the City's economic well-being.

- *Objective 3:* To facilitate the development of a new facility that provides employment for skilled construction and labor trades.

- *Objective 4:* To implement the City's goal of revitalizing blighted and underutilized lands that are appropriate for infill development.

- *Objective 5:* To ensure the site is developed with a high-quality architectural design, landscaping, and signage that is consistent with the City's design guidelines outlined in the Green City Element.

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SECTION 3 ENVIRONMENTAL ANALYSIS

The analysis of environmental effects considered in this section of the EIR will assist the City of South Gate in making a determination as to whether there is a potential for significant or adverse impacts on the environment associated with the proposed project's construction and subsequent operations. In terms of the evaluation of potential environmental effects, there are four possible outcomes:

- *No Impact*. The proposed project will not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The proposed project may have the potential for impacting the environment, although these impacts are likely to be below levels or thresholds that the City or other responsible agencies consider to be significant.

- *Potentially Significant Impact Unless Mitigated*. The proposed project may have the potential to generate impacts that are considered to represent a significant impact on the environment. However, the level of impact may be reduced to levels that are considered to be less than significant with the implementation of the recommended planning design measures and mitigation measures.

- *Potentially Significant and Unavoidable Impact*. The proposed project may, or is known to represent impacts, which are considered significant, even after the adoption of all feasible mitigation. In these instances, the City Council would be required to make findings related to a Statement of Overriding Considerations if it wishes to approve the proposed project.

The analysis of each issue area considers the following:

- The discussion of each issue begins with a section entitled *Scope of Analysis* that provides an overview of the analysis called for as part of the Initial Study's conclusions and scoping comments that were received.

- The *Environmental Setting* describes the regulatory framework and the existing conditions with respect to the issue being analyzed and serves as the baseline against which the environmental impacts are weighed.

- The *Thresholds of Significance* indicates those criteria and standards used by the City, responsible agencies, and trustee agencies in the identification of potentially significant effects.

- The *Environmental Impacts, Conclusions, Mitigation Measures, and Significant Impacts* discussion indicates the potential short-term (construction-related) and long-term (operational) impacts for each issue analyzed; the measures that will be effective in reducing or eliminating an impact; and whether there are any remaining unmitigable significant environmental impacts following mitigation.

3.1 AESTHETIC

This section describes the proposed project's impacts with respect to the existing regulatory and environmental conditions related to aesthetics and other visual resources in the vicinity of the proposed project. This section discusses the existing environmental setting with respect to aesthetics, visual characteristics, light sensitive land uses, discusses local regulations and policies pertinent to aesthetic impacts, light trespass, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address those impacts.

3.1.1. SCOPE AND METHODOLOGY

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential impact for a substantial adverse effect on a scenic vista.
- The project's potential impact, except as provided in Public Resources Code Section 21099, in substantially damaging scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- The project's potential impact for substantially degrading the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point).
- In an urbanized area, the project's potential impact for project conflicting with the applicable zoning and other regulations governing scenic quality.
- The proposed project's potential for creating, except as provided in Public Resources Code Section 21099, a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

When viewing a project site, people may have different responses to that landscape based on what is seen, their expectations of views, and because of proposed or current changes to the visual landscape. Viewer responses will also vary based upon the viewer's values, familiarity, or expectations of that landscape as well as the scenic quality. Because each person's attachment to and value for a view is unique, visual changes to that view will inherently affect viewers differently. Nonetheless, generalizations can be made about viewer sensitivity to scenic quality and visual changes. Recreational users (e.g., hikers, equestrians, tourists, and people driving for pleasure) generally have high concern for scenery and landscape character. People commuting daily through the same landscape generally have a moderate concern for scenery, while people working at an industrial site would generally have a lower concern for scenic quality or changes to existing landscape character. Regarding travelers navigating through a landscape, the visual sensitivity of these types of viewers is affected by the travel speed at which they are moving, the landscape they are viewing, and area in which they are traveling, for example, an interstate or scenic highway. Other considerations may include changes as seen by viewers from hiking trails or stationary viewers from a residence. Existing Cudahy housing units extend along the project site's north side and that the site dominates the south-facing views from the backyards of these homes.

3.1.2 ENVIRONMENTAL SETTING

3.1.2.1 Regulatory Setting

This section summarizes key State and local regulations and programs related to aesthetics in the project area. There are no federal regulations pertaining to aesthetics that apply to the proposed project site specifically.

- *California Building Code*. The California Building Code, Part 2 of Title 24 in the California Code of Regulations (CCR), is based on the International Building Code. The California Building Code includes standards for outdoor lighting that are intended to improve energy efficiency, and to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

- *City of South Gate Zoning Ordinance*. The City of South Gate Zoning Ordinance governs urban design and light trespass. The Code requires the use of shielding or directional lighting so as to eliminate light trespass. The Zoning Ordinance also indicates the maximum lighting intensity permitted in the industrial and commercial zones. Section 11.30.050 (Development requirements) states all exterior lighting shall adhere to the following regulations: 1. All lighting must] be directed onto the premises, resulting in no glare or reflection onto adjacent properties or public right-of-way; and 2. All lighting must emanate only from fixtures located under canopies or hoods, under eaves of buildings, or at ground level in the landscaping. The Zoning Ordinance (Section 11.33.070 [H]) also establishes standards for parking/parking structures stating that, "…light intensity may not exceed 0.5-foot candles1 at any point on the property line."

- *City of South Gate General Plan*. The City of South Gate General Plan includes a Community Design Element that includes goals and policies for future industrial development in the City. The Element calls for new manufacturing uses to be set back from public streets and separated by landscaping. Fences and/or walls may be used to provide security and protection. Buildings and activities should be placed on the site to minimize the impact on adjacent residential uses, where they exist.

3.1.2.2 Existing Physical Setting

Existing Visual Characteristics

The project site is located in the midst of an urban area. An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4. Photographs of the project site and the surrounding area are shown in Exhibits 2-5 through 2-10 in Section 2. Surrounding land uses in the vicinity of the project site include the following:

- *North of the Project site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street.[25] These uses are all considered to be light sensitive. In addition, the site dominates the views from those homes located along the south side of Fostoria Street.

- *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate. These industrial uses are older

[25] Google Maps. Website accessed on February 22, 2022

buildings with metal siding. An active railroad spur track that serves industrial use is located to the south of the project site.[26]

- *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site.[27] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site. Much of the area between the project site and the river channel is unmaintained and is occupied by homeless encampments from time to time.[28]

- *West of the Project Site*. A trucking use is located to the west of the project site. Wilcox Avenue generally extends along the project site's west side. Various commercial and industrial land uses are located further west. The shoulder of the Patata Street continuing westerly to Atlantic often contain trash and discarded debris.[29]

The only remaining structural improvements located within the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site. Historic aerial photographs show that the project site contained structures on the western half of the project site dating back to 1954.[30] The project site has no street frontage and has a single point of ingress and egress that is located at the eastern terminus of Patata Street.

Existing Light and Glare

Lighting effects are associated with the use of artificial light during the evening and nighttime hours. There are two primary sources of light: interior light, light coming from building interiors passing through windows and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting, and landscape lighting). Light can be a nuisance when it impacts light sensitive land uses such as the residential uses which are considered light sensitive. Light spillover or light trespass is typically defined as the presence of unwanted light. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions. Security lighting is present within the project site and is the only current source of light and glare in the site due to its inactive state. The nearest light sensitive land uses include the residents located along Fostoria Street.

Glare is primarily a daytime occurrence typically associated with the reflection of sunlight or artificial light by highly polished surfaces such as window glass or other reflective materials. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior facades composed of highly reflective surfaces. Glare can also be produced during evening and nighttime hours by the reflection of artificial light

[26] Google Maps. Website accessed on February 22, 2022.

[27] Ibid.

[28] Ibid.

[29] Ibid.

[30] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

sources such as automobile headlights. Due to the site's current inactivity, there is currently no light and glare emanating from the site as was evident when the night-time noise measurements were taken..

3.1.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant aesthetic impact if it would:

- create a potential impact that has a substantial adverse effect on a scenic vista; or,
- create a potential impact, except as provided in Public Resources Code Section 21099, a substantially damaging impact on scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or,
- create a potential impact that substantially degrades the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point); or,
- create in an urbanized area, a potential impact for the project conflicting with the applicable zoning and other regulations governing scenic quality; or,
- create, except as provided in Public Resources Code Section 21099, a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.4 ENVIRONMENTAL IMPACTS

3.1.4.1 Impact Analysis: The project's potential impact for a substantial adverse effect on a scenic vista.

The project site is located in the midst of an urbanized area. According to the City of South Gate General Plan Community Design Element, there are no significant and/or protected viewsheds in the immediate area.[31] The Los Angeles River is located to the east of the project site though it is a fully concrete lined flood control channel at this location. The San Gabriel Mountains are located approximately 17 miles north of the site. Finally, the Pacific Ocean is located approximately 13.5 miles to the south of the project site. The views of these features will not be obstructed by the proposed project.

During the ongoing site preparation, remediation, and development phases, the project would be required to comply with the applicable South Gate Municipal Code regulations governing property maintenance. The Municipal Code requires a construction site be maintained in a clean and well-kept manner. No component of the project's construction would conflict with these applicable regulations. The City of South Gate's Zoning and Development Code includes design standards and property maintenance requirements and other visual considerations. These design standards would help reduce the potential for aesthetic conflicts. As a result, no significant adverse impacts are anticipated.

[31] City of South Gate General Plan. *Chapter 3. Community Design Element. Figure CD-2. Key Community Design Concepts*. Page 53.

Conclusions: The proposed project would not result in any significant adverse impacts on a scenic vista. As a result, the analysis determined that no impacts would result.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.1.4.2 Impact Analysis: The project's potential impact, except as provided in Public Resources Code Section 21099, in substantially damaging scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

The project site is located in the midst of an urbanized area. The only remaining structural improvements located within the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site. Historic aerial photographs show that the project site contained structures on the western half of the project site dating back to 1954.[32] The project's implementation would involve the removal of the existing debris and the elimination of the site' blighted appearance.

According to the City of South Gate General Plan, there are no designated scenic highways located in the City.[33] The Community Design Element does recognize key transit corridors in the City that includes Atlantic Avenue. The General Plan seeks to transform "Corridors from features that divide the community into areas that bring people together. Corridors should be attractive, contain a diverse mix of uses – including residential uses at higher densities than currently exist – provide safe travel for pedestrians, bicycles, transit vehicles and automobiles, and enable people and goods to circulate with relative ease." The proposed project's implementation will not adversely impact the General Plan's policy vision for the Atlantic corridor. As a result, no significant adverse impacts are anticipated.

Conclusions: The proposed project's impact on local scenic resources would not be significant and no impacts would result.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts on this issue would result.

3.1.4.3 Impact Analysis: The project's potential impact in substantially degrading the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point).

The proposed project would involve the elimination of the existing blighted state of the site and its replacement with a new industrial development that would total 451,593 square-feet of floor area. The proposed development would include a new main building consisting of 435,420 square feet and a smaller truck maintenance building consisting of 16, 173 square feet. The corporate office would be recessed and would consist of glazing with horizontal accents and a canopy. The west-facing office would have a punch storefront glazing to provide variety

[32] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

[33] City of South Gate General Plan. *Chapter 3. Community Design Element. Figure CD-2. Key Community Design Concepts.* Page 53.

that complements the main entry. Reveals, accent colors, and shortened accent panels would provide an integrated design for the larger building. In addition to a storefront office, the main building would also include a warehouse mezzanine office totaling 3,000 square feet. The entire building would be equivalent to Leadership in Energy and Environmental Design (LEED™) Certified Silver Core and Shell. The proposed industrial building would provide large unobstructed spaces that can accommodate many types of activities and would support changing operations in a changing business landscape.[34] The building elevations are shown in Exhibits 2-12 and 2-13 in Section 2.

The parking areas would be concentrated on the west side of the project site, with the majority of parking provided near the office and the remainder provided around the perimeter along the north and east property lines. The dock positions and 163 delivery vehicles and trailer stalls would be located on the south side of the main building, providing separation from the residential properties located to the north of the site in the City of Cudahy. The truck court would be screened due to the project site's natural slope to the south. A 28-foot-wide drive aisle would be provided and the trucks would be separated prior to entering the site.[35]

Setbacks with landscaping would be provided along the property lines consistent with the Zoning Code.[36] The front building setback would be 10 feet, and the rear and side building setbacks would be 30 feet. The proposed project would provide 137,655 square feet of landscaping, which would be 10 percent of the project site's total land area. Landscaping would be provided around the perimeter of the project site, along the northern and western sides of the main building, and in the parking lots within the western and northern areas of the project site. The proposed landscaping would include varied tree species, shrubs, groundcover, and vines, with drought-tolerant plant species that would be consistent with the surrounding area. A 10-foot screen wall would be provided along the northern property line to create a barrier between the project site and the City of Cudahy residential area.[37] The landscape plan is illustrated in Exhibit 2-14 in Section 2.

As indicated previously, the only remaining structural improvements located within the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. As part of the proposed project's implementation, these existing dilapidated improvements will be removed and replaced with the newer buildings described above. As a result, no significant adverse impacts are anticipated.

Conclusions: The long-term project-related visual impacts would not be significant.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: Less than Significant Impacts would result.

[34] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[35] Ibid.

[36] City of South Gate. 2015. City of South Gate Comprehensive Zoning Code, 11.24.060 Light and Heavy Manufacturing (M2 & M3) Zones. March. Website: https://www.cityofsouthgate.org/DocumentCenter/View/1183. Accessed July 28, 2021.

[37] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

3.1.4.4 Impact Analysis: In an urbanized area, the project's potential impact for project conflicting with the applicable zoning and other regulations governing scenic quality.

The proposed project would involve the elimination of the existing blighted state of the site and its replacement with a new industrial development that would total 435,420 square-feet of floor area. The City of South Gate General Plan (Community Design Element) includes the following goals, objectives, and policies (shown in italics) that are applicable to the proposed project:

- *Goal CD 8: An improved visual appearance throughout the City*. The proposed project's implementation is consistent with this goal. The existing blighted conditions would be eliminated and the site would be occupied with a modern development that conforms to the City's current development requirements.

- *Objective CD 8.1: Ensure high quality architecture and urban design throughout the City*. The proposed project's implementation is consistent with this objective. The existing blighted conditions would be eliminated and the site would be occupied with a new building that consists of a modern state of the art design.

- *Policy 1 The City will encourage innovative and quality architecture in the City with all new public and private projects.* The proposed project's implementation is consistent with this policy. The existing blighted conditions would be eliminated and the site would be occupied a new building consisting of a high quality modern design.

- *Policy 2 New buildings will be constructed to create attractive, pedestrian-friendly places.* The proposed project's implementation is consistent with this policy. Sidewalks and the Los Angeles River Trail connection would be maintained and improved.

- Policy 3 *High-quality and long-lasting building materials will be required on all new non-residential and multi-family Policy housing projects*. The proposed project's implementation is consistent with this policy. The existing blighted conditions would be eliminated and the site would be occupied with a state of the art, modern development that will consist of modern and long-lasting construction that will enhance the local environment.

- *Policy 4 New non-residential and multi-family buildings will be designed with attractive and inviting frontage on all public streets*. The existing blighted conditions would be eliminated and the site would be occupied with a new modern development that will be oriented towards Patata Street and Wilcox Avenue.

- *Objective CD 8.4: Reduce the impact of Manufacturing/Distribution and Light Industrial/Flex businesses on adjoining land uses.* The City is overseeing the preparation of this EIR to identify both mitigation and the mitigation monitoring and reporting program. Furthermore, the City has met with the project Applicant to identify design changes that would also be effective in mitigating potential impacts related to the proposed project's operations.

- *Policy 1 Neighborhoods should be protected from incompatible non-residential uses and disruptive traffic and other noise generating uses to the greatest extent feasible.* The proposed project's implementation is consistent with this policy. The site plan calls for a generous separation between the

proposed use and the adjacent homes. The loading docks and the truck maneuvering area would be located on the south side of the new building, opposite the existing homes.

- *Policy 2* T*he consideration and mitigation of noise, light, vehicular and other impact on residential properties will be considered when Manufacturing/Distribution or Light Industrial/Flex are proposed.* The City is overseeing the preparation of this EIR to identify both mitigation and the mitigation monitoring and reporting program to address these environmental issues. Furthermore, the City has met with the project Applicant to identify design changes that would also be effective in mitigating potential impacts related to the proposed project's operations.

- *Policy 3 Existing, non-conforming industrial uses should be phased out during the course of the General Plan. The proposed project's implementation is consistent with this policy.* The existing blighted conditions would be eliminated and the site would be occupied with a modern development that conforms to the City's current development requirements. Furthermore, the proposed project conforms to the City's General Plan and Zoning Ordinance.

- *Policy 4 The City will not permit existing, non-conforming industrial uses to significantly expand their facilities except to rectify building code violations and maintain the appearance of the building*. The proposed project's implementation is consistent with this policy. The proposed project will not lead to an expansion of an existing non-conforming land use. Furthermore, the proposed project conforms to the City's General Plan and Zoning Ordinance in terms of land use.

- *Policy 5 Industrial uses should be regulated to minimize smoke, pollution, glare, excessive noise and other adverse impact on employees and on adjoining uses and areas*. The proposed project's implementation is consistent with this policy. The proposed project will be required to adhere to all pertinent requirements that govern noise control, air emissions, and other environmental impacts. The City is overseeing the preparation of this EIR to identify both mitigation and the mitigation monitoring and reporting program to address these environmental issues.

- *Policy 6 Industrial uses should be adequately fenced and landscaped so as to minimize the potential impact on adjoining uses. The proposed project's implementation is consistent with this policy.* This policy is addressed in the Site Plan and Landscape Plan which promotes the use of landscaping for both screening and the enhancement of aesthetics. The landscape plan also utilizes screening and buffers to enhance the main building's separation from the homes located to the north.

- *Policy 7 Truck and employee traffic generated by industrial uses should be restricted to designated truck routes as specified in the Mobility Element of the General Plan*. Future truck traffic will be required to adhere to all pertinent City Ordinances including the use of designated truck routes.

- *Policy 8 Truck parking on public streets in non-industrial areas will be prohibited.* Future traffic will be required to adhere to all pertinent City Ordinances including the use of designated truck routes. No on-street parking will be permitted. The proposed project will be required to provide sufficient off-site parking.

- *Policy 9* The *City will limit the development of industrial and other uses that use, store, produce or transport toxic substances, generate unacceptable levels of noise or air pollution, or produce other pollutants*. The City will require adequate mitigation measures, confirmed by environmental review and

monitoring, for all such uses that are developed. The proposed project's implementation is consistent with this policy.

Conclusions: There would not be any long-term project-related impacts with respect to conformity with applicable zoning and other regulations governing scenic quality.

Mitigation Measures: No mitigation would be required.

Significance after Mitigation: Less than significant impacts would result.

3.1.4.5 Impact Analysis: The proposed project's potential for creating, except as provided in Public Resources Code Section 21099, a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Surrounding land uses in the vicinity of the project site include residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street.[38] These uses are all considered to be light sensitive. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate.[39] The Los Angeles River Channel is located to the east of the project site.[40] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site.[41] Wilcox Avenue generally extends along the project site's west side.[42] Light sensitive land uses are shown in Exhibit 3-1.

The City of South Gate Zoning Ordinance indicates the maximum lighting intensity permitted in the industrial and commercial zones. Section 11.30.050 (Development requirements) states all exterior lighting shall adhere to the following regulations: 1. [All lighting must] be directed onto the premises, resulting in no glare or reflection onto adjacent properties. under canopies or hoods, under eaves of buildings, or at ground level in the landscaping.

[38] Google Maps. Website accessed on February 22, 2022

[39] Ibid.

[40] Ibid.

[41] Ibid.

[42] Ibid.

EXHIBIT 3-1
LIGHT SENSITIVE LAND USES
Source: Blodgett Baylosis Environmental Planning

The proposed project would be required to comply with the City's requirements for outdoor lighting. The City of South Gate Zoning Ordinance indicates the maximum lighting intensity permitted in the industrial and commercial zones. Section 11.30.050 (Development requirements) states all exterior lighting shall adhere to the following regulations: [All lighting must] be directed onto the premises, resulting in no glare or reflection onto adjacent properties or public right-of-way; and [All lighting must] emanate only from fixtures located under canopies or hoods, under eaves of buildings, or at ground level in the landscaping. The proposed project's lighting plan would include night lighting for the parking areas, walkways, and driveways. Outdoor lights would be shielded and oriented downward to prevent light trespass and glare. Additionally, no lighting would be directed to the north where residential uses currently exist. The project site lighting would be designed to comply with LEED™, Cal Green, and California Title 24 requirements. As a result, no significant adverse impacts are anticipated.

Conclusions: There would not be any long-term project-related impacts related to potential light and glare impacts.

Mitigation Measures: The analysis determined that no mitigation is required.

Significance after Mitigation: Less than significant impacts would result.

3.2 AGRICULTURE AND FORESTRY IMPACTS

This is section describes the proposed project's impacts with respect to agriculture and forestry impacts.

3.2.1. SCOPE AND METHODOLOGY OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for converting *Prime Farmlan*d, *Unique Farmland*, or *Farmland of Statewide Importance* as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

- The project's potential for conflicting with the existing zoning for agricultural uses, or a Williamson Act Contract.

- The project's potential for conflicting with existing zoning for or causing a 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)).

- The project's potential for resulting in the loss of forest land or the conversion of forest land to a non-forest use.

- The project's potential for involving 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 a non-forest use.

3.2.2 ENVIRONMENTAL SETTING

3.2.2.1 Regulatory Setting

This section summarizes key State and local regulations and programs related to agriculture and forestry impacts that apply to the proposed project.

- *City of South Gate Zoning Ordinance*. The City of South Gate Zoning Ordinance governs permitted land uses and development in the City. The Zoning Ordinance indicates those land uses that are permitted in the City of South Gate along with certain development standards. The Zoning Map indicates the location and extent of those land uses that are identified in the Zoning Ordinance as being permitted. No agricultural uses other than commercial nurseries are permitted in the City. These uses are allowed in the LI, M2, and M3 zone districts. The site is currently zoned as M3. While these uses are permitted within the project site, no nursery uses are present.

- *City of South Gate General Plan*. The City of South Gate General Plan governs the location and extent of planned land uses in the City. The General Plan does not include a land use designation related to agricultural uses or forestry uses specifically. The project site is designated as *Industrial* in the General Plan.

- *Farmland Mapping and Monitoring Program*. The Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data that is used for analyzing development-related impacts and other impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance.

- *Williamson Act Contract.* The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to urban uses.

3.2.2.2 Existing Physical Setting

The project site is located in the northeastern corner of the City of South Gate that consists of manufacturing and distribution uses. Residential development extends along the northern boundary of the project site within the corporate boundaries of the City of Cudahy. The project site is generally bounded by the Los Angeles River along the eastern side of the project site, Patata Street and the Union Pacific Railroad (Patata Industrial Lead line) is located to the south, an industrial property and Wilcox Avenue is located to the west, and a residential neighborhood is located to the north.[43] There are no farmland activities or forestry resources currently located within the project site. No mapped resources are located in the area according to the Farmland Mapping and Monitoring Program (refer to Exhibit 3-2).

3.2.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant aesthetic impact if it would:

- 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 uses; or,

- Conflict with existing zoning for agricultural uses, or a Williamson Act Contract; or,

- 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)); or,

- Result in the loss of forest land or conversion of forest land to a non-forest use; or,

[43] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

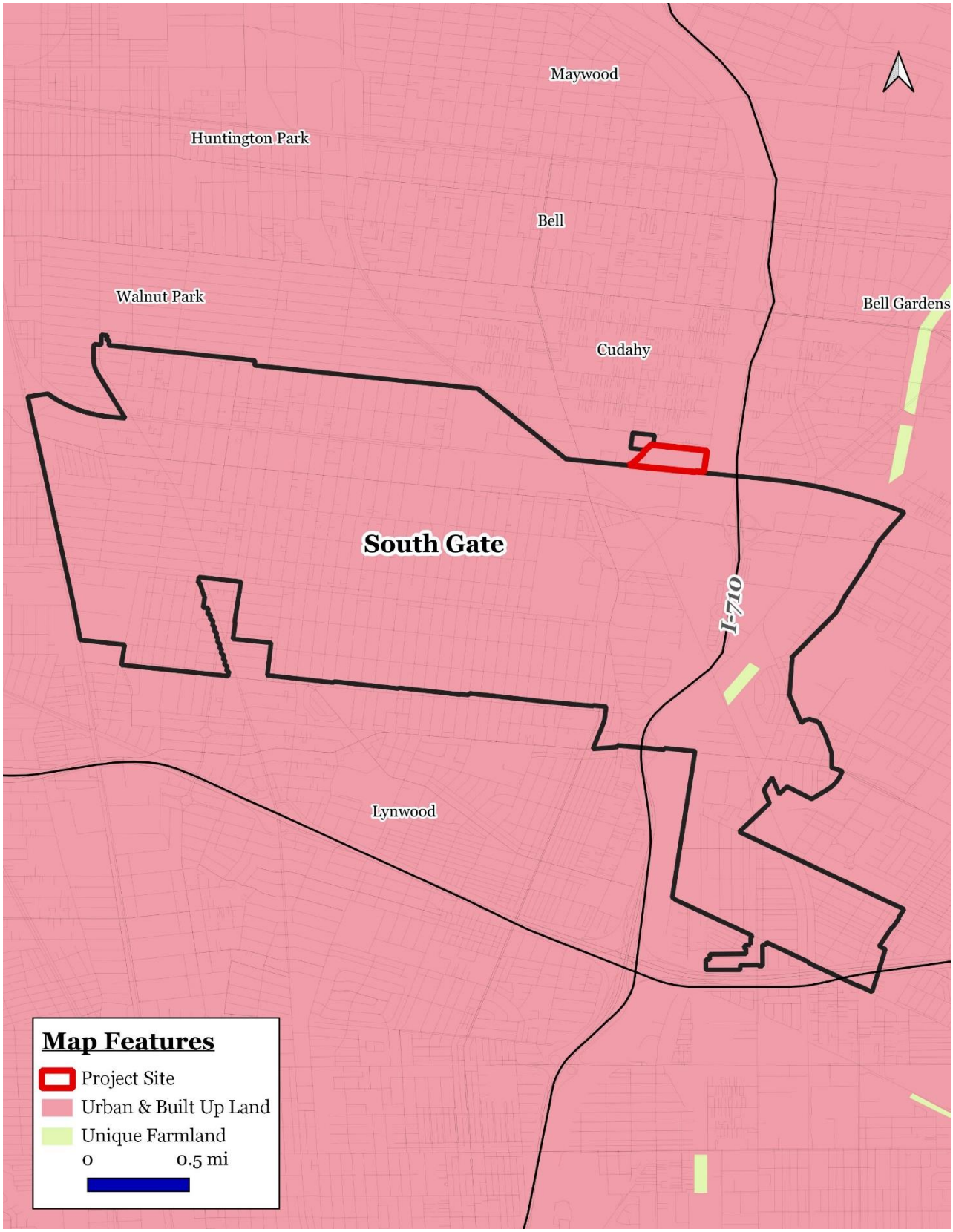

EXHIBIT 3-2
AGRICULTURAL RESOURCES
Source: Blodgett Baylosis Environmental Planning

- 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 a non-forest use.

3.2.4 ENVIRONMENTAL IMPACTS

3.2.4.1 Impact Analysis: The project's potential for converting 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.

According to the California Department of Conservation, the City of South Gate does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[44] The entire City is urban and not classified as having Important Farmland. The project site is currently zoned as *M3 (Heavy Manufacturing*). The City's General Plan designates the site as *Industrial* and the General Plan does not identify any agricultural uses within City boundaries.[45] There are no agricultural uses currently located within the site that would be affected by the project's implementation. Furthermore, the implementation of the proposed project will not involve the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to urban uses, no impacts will occur.

Conclusions: There would not be any impacts on this issue since there are no designated farmland soils within the project site.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.2.4.2 Impact Analysis: The project's potential for conflicting with the existing zoning for agricultural uses, or a Williamson Act Contract.

The City's General Plan does not identify any agricultural uses within City boundaries. The proposed project will not require a zone change though it will not require a general plan amendment, as the proposed use is permitted within the project site (refer to Section 3.11.2.A). Since no zone change or general plan amendment will occur, no loss of land zoned for/or permitting agricultural uses will occur. There are no agricultural uses located within the site or on adjacent properties that would be affected by the proposed project's implementation. In addition, according to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.[46]

Conclusions: There would not be any impacts on this issue.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[44] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*. https://maps.conservation.ca.gov/DLRP/CIFF/.

[45] South Gate, City of. *South Gate General Plan 2035.* Community Design Element. December 2009.

[46] California Department of Conservation. *State of California Williamson Act Contract Land.* ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.

3.2.4.3 Impact Analysis: The project's potential for converting Prime Farmland, Unique Farmland, or The project's potential for conflicting 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)).

The City of South Gate is located in the midst of a larger urban area and no forest lands are located within the City. The City's General Plan does not provide for any forest land preservation.[47] As a result, no impacts on forest land or timber resources will result from the proposed project's implementation.

Conclusions: There would not be any impacts on this issue.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.2.4.4 Impact Analysis: The project's potential for resulting in the loss of forest land or conversion of forest land to a non-forest use.

The City of South Gate is located in the midst of a larger urban area and no forest lands are located within the City. The City's General Plan does not provide for any forest land preservation.[48] As a result, no impacts on forest land or timber resources will result from the proposed project's implementation.

Conclusions: There would not be any impacts on this issue.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.2.4.5 Impact Analysis: The project's potential for involving 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 a non-forest use.

The project would not result in the disruption or damage of the existing environment that would, in turn, result in a loss or the conversion of farmland uses to non-agricultural use or conversion of forest land to non-forest use. The project site is not located in close proximity to farmland or forest land. As a result, no impacts will result from the implementation of the proposed project.

Conclusions: There would not be any impacts on this issue.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[47] South Gate, City of. *South Gate General Plan 2035.* Community Design Element. December 2009.

[48] Ibid.

3.3 AIR QUALITY IMPACTS

This section describes the proposed project's impacts with respect to air quality. This section discusses the existing environmental setting with respect to potential emissions, sensitive receptors, discusses Federal, State, regional, and local regulations and policies pertinent to air quality, assesses the potentially significant air quality impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address those impacts. The CalEEMod computer worksheets summarizing the operational (long-term) and short-term (construction) emissions are provided in Appendix B.

3.3.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for resulting in a conflict with or obstruction of the implementation of the applicable air quality plan.
- The project's potential for resulting 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.
- The project's potential for exposing sensitive receptors to substantial pollutant concentrations.
- The project's potential resulting in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
- The project's potential for resulting 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.

3.3.2 ENVIRONMENTAL SETTING

3.3.2.1 Regulatory Setting

This section summarizes key State and local regulations and programs related to air quality regulations in the project area. Ambient air quality standards (AAQS) have been adopted at National and State levels for criteria air pollutants. In addition, both the federal and State governments regulate the release of toxic air contaminants (TACs). The City of South Gate is located within the South Coast Air Basin (SCAB) and is subject to the rules and regulations imposed by the South Coast Air Quality Management District.

- *Environmental Protection Agency (EPA).* The EPA is the lead Federal Agency charged with the implementation and enforcement of the Federal Clean Air Act (FCAA). As part of this effort, the EPA is responsible for the establishment of national ambient air quality standards (referred to herein as the *Federal*

Standards). The EPA also regulates mobile emission sources that include automobiles, trucks, aircraft, and recreational vehicles.[49]

- *Federal Clean Air Act (FCAA)*. The FCAA required the U.S. EPA to establish NAAQS and set deadlines for their attainment. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. NAAQS identify levels of air quality for "criteria" pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety, to protect the public health and welfare. The criteria pollutants are ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2 is a form of NOx), sulfur oxides (SO2 is a form of SOx), PM less than 10 and 2.5 microns in diameter (PM10 and PM2.5, respectively) and lead (Pb).

- *Toxic Substances Control Act*. The Toxic Substances Control Act first authorized the U.S. EPA to regulate asbestos in schools and Public and Commercial buildings under Title II of the law, which is also known as the Asbestos Hazard Emergency Response Act (AHERA). AHERA requires Local Education Agencies to inspect their schools for asbestos-containing building materials (ACBM) and to prepare management plans to reduce the asbestos hazard. The Act also established a program for the training and accreditation of individuals performing certain types of asbestos work.

- *National Emission Standards for Hazardous Air Pollutants*. Pursuant to the FCAA of 1970, the U.S. EPA established the National Emission Standards for Hazardous Air Pollutants (NESHAPs). These pollutants are technology-based source-specific regulations that limit allowable emissions of HAPs. Among these sources include ACBM. NESHAPs include requirements pertaining to the inspection, notification, handling, and disposal of ACBM associated with the demolition and renovation of structures.

- *California Air Resources Board (CARB)*. The CARB is part of the California Environmental Protection Agency (CALEPA), and it is responsible for overseeing the implementation of the California Clean Air Act, overseeing the State requirements that implement the Federal CCAA, and establishing the State ambient air quality standards. The CARB is responsible for setting emission standards for vehicles sold in California and for other emission-sources including consumer goods and off-road equipment. The CARB has also established vehicle fuel specifications.

- *California Clean Air Act*. The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan for meeting federal clean air standards for the State of California. Like the EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years.

- *South Coast Air Quality Management District (SCAQMD)*.The SCAQMD has jurisdiction over air quality for the Southern California region. The SCAQMD has adopted an Air Quality Attainment Plan (AQAP) that includes rules and regulations that focus on the attainment of the State and Federal air quality standards. Conformance with the AQMP for development projects is determined by demonstrating compliance with the

[49] Automobiles sold in California must meet the stricter emission standards established by the California Air Resources Board.

applicable local land use plans. All development projects within the SCAQMD are required to comply with existing District rules that are applicable to each specific project. The major rules include Rule 402 Nuisances (odors, etc.), Rule 403 Control of Fugitive Dust, Rule 1401 Toxic Contaminants, Rule 1403 Asbestos from Demolition Activities, and Rule 2305 Warehouse Indirect Source Rule. The AQMP sets forth a comprehensive program that will lead the District into compliance with all Federal and State air quality standards.[50] These SCAQMD Rules that must be adhered to that would further reduce the level of emissions include the following:

- *SCAQMD Rules 402 and 403* (requires watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the proposed project and were applied in CalEEMod to minimize fugitive dust emissions. The recommended mitigation would be required to ensure compliance with SCAQMD Rules and Regulations. Compliance would be verified and enforced through the City's development review process.

- *SCAQMD Rule 1113* provides specifications on painting practices and regulates the ROG content of paint. As required by law, all architectural coatings for the proposed structures would comply with SCAQMD Rule 1113.

- *SCAQMD Rule 2305* provides various compliance standards to further reduce local and regional emissions of nitrogen oxides and particulate matter, and to facilitate local and regional emission reductions associated with warehouses and the mobile sources attracted to warehouses in order to assist in meeting state and federal air quality standards for ozone and fine particulate matter. This rule applies to owners and operators of warehouses located in the SCAQMD jurisdiction with greater than or equal to 100,000 square feet of indoor floor space in a single building.

- *City of South Gate General Plan*. The Public Safety Element of the City's General Plan includes a number of policies that specifically address air quality. These policies are listed below:

  Policy 1. The City will implement strategies in the Mobility Element that improve air quality through transportation. These include multi-modal transit, reduction of Vehicle Miles Traveled (VMT) through Transportation Demand Management (TDM), and improved bicycle and pedestrian facilities.

  Policy 2. For special events at South Gate Park and other communitywide events that draw large numbers of visitors from outside of the City, event sponsors will be encouraged to create off-site park and ride options to reduce driving and traffic congestion around the event. The City will work with the event sponsor to identify an appropriate location of the offsite parking facility and may provide city-owned facilities at little or no cost.

  Policy 3. The City should support federal, state, and regional agencies in their efforts to reduce exposure to emissions from railroad, truck, and industrial diesel emissions.

  Policy 4. The City will not designate new truck routes on primarily residential streets.

[50] Imperial County Air Pollution Control District. *CEQA Air Quality Handbook, Guidelines for the Implementation of the California Environmental Quality Act, as Amended 1970*. November 2007.

Policy 5. The state regulation that requires school buses and other heavy-duty vehicle operators to turn off their engines if they are idling within 100 feet of a school will be enforced by the City.

Policy 6. The City will collaborate with transportation agencies, utilities, and developers to minimize fugitive dust and emissions from construction and maintenance activities.

Policy 7. The City will pursue funding for transportation projects that improve air quality. Potential sources include AB 2766 "Local Government Match Program" grants for projects that reduce mobile source emissions and federal Congestion and Air Quality (CMAQ) Improvement funds

Policy 8. The City will promote and support transit improvements or facilities that are powered by electricity, alternative fuels (i.e., CNG or LNG), or that meet or exceed SULEV (Super Ultra Low Emissions Vehicle) emission standards.

3.3.2.2 Physical Setting

Criteria Pollutants

Criteria air pollutants refer to those pollutants that are subject to both Federal and State ambient air quality standards as a means to protect public health. For some criteria pollutants, such as carbon monoxide, there are also secondary standards designed to protect the environment, in addition to human health. Toxic air contaminants are typically measured at the source and their evaluation and control is generally site or project specific. Finally, global warming and ozone-depleting gases are not monitored, though sources of greenhouse gas emissions are subject to Federal and regional policies that call for their eventual elimination.

The EPA established National Ambient Air Quality Standards (NAAQS) ambient air quality standards for the following air pollutants: ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). The CARB has also established ambient air quality standards for six of the aforementioned pollutants regulated by the EPA. Some of the California ambient air quality standards are more stringent than the national ambient air quality standards. In addition, California has established ambient air quality standards for the following: sulfates, vinyl chloride, and visibility. Table 3-1 lists both the current California ambient air quality standards (AAQS) and the Federal AAQS for each criteria pollutant. The Basin is designated as nonattainment with the State ambient air quality standards for PM10, PM2.5 and ozone, while the Coachella Valley is designated as nonattainment with the State air quality standards for PM10 and ozone.[51]

[51] http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan

Table 3-1
National and California Ambient Air Quality Standards

Pollutants	National Standards	State Standards
Lead (Pb)	1.5 µg/m3(primary and secondary, not to be exceeded more than once/year)	1.5 µg/m3 (30-day average)
Sulfur Dioxide (So_2)	0.14 ppm (24-hour)	0.25 ppm (1-hour) 0.04 ppm (24-hour)
Carbon Monoxide (CO)	9.0 ppm(8-hour) 35 ppm(1-hour)	9.0 ppm (8-hour) 20 ppm (1-hour)
Nitrogen Dioxide (NO_2)	0.053 ppm (annual average)	0.25 ppm (1-hour)
Ozone (O_3)	0.070 ppm (8-hour)	0.09 ppm (1-hour) 0.070 ppm (8-hour)
Fine Particulate Matter (PM2.5	35 µg/m3 (24-hour)	12 µg/m3 (annual)
Fine Particulate Matter (PM_{10})	150 µg/m3 (24-hour)	50 µg/m3 (24-hour)
Sulfate	75 ppb (1-hour)	25 µg/m3 (24-hour)

Source: Environmental Protection Agency. https://www.epa.gov/criteria-air-pollutants/naaqs-table

The focus of the air quality analysis provided herein is related to the potential emissions of criteria pollutants associated with future development arising as part of the proposed project's construction and subsequent operation. The criteria pollutants of special concern include the following:

- *Ozone (O_3)* is a nearly colorless gas that irritates the lungs and damages materials and vegetation. O_3 is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).

- *Carbon Monoxide (CO),* a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain, is produced by the incomplete combustion of hydrocarbon fuels.

- *Nitrogen dioxide (NO_2)* is a yellowish-brown gas that, at high levels, can cause breathing difficulties. NO_2 is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. NO_x emissions are also a concern because of their contribution to the formation of O_3 and particulate matter.

- *Sulfur dioxide* (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.

- *PM_{10}* refers to particulate matter less than ten microns in diameter. PM_{10} causes a greater health risk than larger-sized particles, since fine particles can more easily cause respiratory irritation.

The sources and potential health effects of the criteria pollutants are summarized in Table 3-2.

Table 3-2
Primary Sources and Effects of Criteria Pollutants

Pollutants	Emissions Source	Health Effects
Sulfur Dioxide (SO_2)	•Combustion of sulfur fossil fuels •Smelting of sulfur-bearing metal ores •Industrial processes	•Irritation of eyes •Aggravation of respiratory diseases (asthma, emphysema)
Carbon Monoxide (CO)	•Incomplete combustion of fuels and other carbon-containing substances	•Irritation of eyes •Aggravation of respiratory diseases (asthma, emphysema)
Nitrogen Dioxide (NO_2)	•Motor vehicle exhaust •High-temperature stationary combustion	•Aggravation of respiratory illness
Ozone (O_3)	•Atmospheric reaction of organic gases with nitrogen oxides in sunlight	•Irritation of eyes •Aggravation of respiratory & cardiovascular diseases
Fine Particulate Matter (PM_{10})	•Stationary combustion of solid fuels •Construction activities •Industrial processes	•Increased cough and chest discomfort •Aggravation of respiratory and cardio-respiratory diseases

Source: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan

Toxic Air Contaminants

In 1983, the California legislature enacted a program to identify the health effects of toxic air contaminants (TACs) and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code defines a TAC as "an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the Federal CAA (42 United States Code Section 7412[b]) is a TAC. Under State law, the Cal EPA, through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or may present a potential hazard to human health. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines. Because the project is proposing an industrial warehouse requiring daily visits from heavy-duty diesel trucks during operations, it would be a source of diesel particulate matter (DPM) concentrations during project operations

Local Air Quality

The project site is located in the northeastern corner of the City of South Gate that consists of manufacturing and distribution uses. Residential development extends along the northern boundary of the project site within the corporate boundaries of the City of Cudahy. The project site is generally bounded by the Los Angeles River along the eastern side of the project site, Patata Street and the Union Pacific Railroad (Patata Industrial Lead line) is located to the south, in an industrial property and Wilcox Avenue is located to the west, and the aforementioned residential neighborhood is located to the north. Local access to the project site is provided by Patata Street, which connects to Atlantic Avenue, located approximately 0.30 mile to the west of the project site.

The majority of the project site was previously occupied by the former Armstrong World Industries plant with the former improvements having consisted of approximately 239,200 square feet of manufacturing-related floor area. This plant is now closed and there are no operations being conducted at this time. The western portion of the project site was occupied by manufacturing buildings that have since been demolished. The eastern portion of the project

site, located next to the Los Angeles River, is vacant and undeveloped. The previous buildings that occupied the project site included a 5,630-square-foot office building, a 216,600-square-foot concrete building, and a 16,970 square-foot metal building. The only remaining structural improvements include building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping.[52]

The City of South Gate and the project site are located in the SCAB. The SCAB is a 6,645-square mile area bounded by the San Gabriel, San Bernardino, and the San Jacinto Mountains to the north and east, and the Pacific Ocean to the west. The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, along with the San Gorgonio Pass area of Riverside County. The distinctive climate of the SCAB is attributable to its terrain, which is a coastal plain with connecting broad valleys and low hills, and its geographical location, which is bounded by the Pacific Ocean to the west and high mountains to the north, east, and south. The extent and severity of air pollution in the SCAB is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of air pollutants throughout the SCAB, making it an area of high pollution potential.

The project area's climate has been classified as "Mediterranean," implying cool, dry summers and mild winters with moderate rainfall. The region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is infrequently interrupted by periods of extremely hot weather, winter storms, or Santa Ana winds. Wind patterns across the SCAB are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is typically higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation (referred in as an inversion) is one of the critical determinants of air quality conditions on any given day. During winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, result in very strong, downslope Santa Ana winds. These winds normally continue for a few days before predominant meteorological conditions are reestablished.

3.3.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant air quality impact if it would:

- Result in a conflict with or obstruction of the implementation of the applicable air quality plan; or,
- 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; or,
- Expose sensitive receptors to substantial pollutant concentrations; or,
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

[52] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

The SCAQMD has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for criteria pollutants. A project would be considered to have a significant effect on air quality if it violated any AAQS, contributed substantially to an existing air quality violation, or exposed sensitive receptors to substantial pollutant concentrations. In addition to the Federal and State AAQS, there are daily emissions thresholds for construction and operational activities. Projects in the SCAB generating *construction-related* emissions that exceed any of the following daily emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM_{10};
- 55 pounds per day of $PM_{2.5}$; or,
- 150 pounds per day of sulfur oxides.

A project would have a significant effect on air quality if any of the following *operational* daily emissions thresholds for criteria pollutants are exceeded:

- 55 pounds of reactive organic compounds;
- 55 pounds of nitrogen dioxide;
- 550 pounds of carbon monoxide;
- 150 pounds of PM_{10};
- 55 pounds per day of $PM_{2.5}$; or,
- 150 pounds of sulfur oxides.

In addition to the above criteria pollutants, the SCAQMD has established thresholds of significance for toxic air contaminants (TACs). For TACs, the threshold is the maximum incremental cancer risk that is equal to or greater than ten occurrences of cancer in one million.

3.3.4 ENVIRONMENTAL IMPACTS

3.3.4.1 Impact Analysis: The project's potential for resulting in a conflict with or obstruction of the implementation of the applicable air quality plan.

As part of its enforcement responsibilities, the EPA requires each state that are in a non-attainment to prepare and submit a State Implementation Plan (SIP) that demonstrates how the State intends to attain the federal standards. The SIP must integrate both federal, state, and local plan components and regulations so as to identify specific measures to reduce pollution in nonattainment areas. Under State law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date. As indicated previously, the proposed project is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment.

The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. The 2016 AQMP seeks to achieve multiple goals in partnership with other entities promoting reductions in criteria pollutant, greenhouse gases, and toxic risk, as well

as efficiencies in energy use, transportation, and goods movement. The most effective way to reduce air pollution impacts on the health of nearly 17 million residents, including those in disproportionally impacted and environmental justice communities that are concentrated along transportation corridors. For that reason, the SCAQMD worked closely with the CARB and the United States Environmental Protection Agency (U.S. EPA) who have primary responsibility for these sources. The AQMP recognized the critical importance of working with other agencies to develop new regulations, as well as secure funding and other incentives that encourage the accelerated transition of vehicles, buildings, and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy. The 2016 AQMP also includes transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/ Sustainable Communities Strategy. The 2016 AQMP includes the integrated strategies and measures needed to meet the NAAQS. South Coast AQMD recently approved on March 3, 2017, the 2016 AQMP that demonstrates attainment of the 1-hr and 8-hr ozone NAAQS as well as the latest 24-hr and annual PM2.5 standards. Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP:[53]

- *Consistency Criteria 1* refers to a proposed project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.

- *Consistency Criteria 2* refers to a proposed project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.[54]

As indicated in Tables 3-3 and 3-4, the proposed project's criteria pollutant emissions would not exceed the SCAQMD's daily thresholds of significance. (Refer to Impact Analysis 3.2.4.2). Therefore, the project would not contribute to an existing air quality violation. Thus, the project would be consistent with the first criterion. Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Although the proposed project calls for a change in zoning, the change proposed is from M3 to M2. The General Plan designation will remain Industrial. The proposed Project would not result in a direct increase in population since the proposed project is not a residential use and would not accommodate any new residents. The proposed project is a new industrial use that would replace an older obsolete use that has been demolished. As a result, the project would not result in substantial "unplanned growth or unaccounted growth" that would affect job growth projections used by the SCAQMD to develop the AQMP. Thus, a less than significant impact would occur.

Conclusions: The project would not have a potential for resulting in a conflict with or obstruction of the implementation of the applicable air quality plan.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[53] South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

[54] Ibid.

3.3.4.2 Impact Analysis: The project's potential for resulting 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.

The remaining demolition and remediation phases of the proposed project are anticipated to take approximately 6 to 7 months. Construction of the proposed project would take approximately 14 months. The existing cell phone tower on the project site would be protected in place using construction bollards or rails. The key construction phases are outlined below:

- *Remediation*. Construction of the proposed project would result in approximately 52,173 cubic yards of cut, 52,173 cubic yards of fill, and 41,905 cubic yards of over-excavation. A total of 28,660 cubic yards of contaminated soil would be removed from the site, and approximately 100,000 cubic yards of import would be used to replace the contaminated soil.[55] For purposes of analysis, the one-way transport distance for the haul trucks was assumed to be 26 miles (Azusa Landfill). Each truck would haul approximately 20 cubic yards per day per truck with 60 truck trip ends per day.

- *Site Preparation*. The project site would be readied for the construction of the proposed project in this phase. This phase would involve the removal of concrete, trash and vegetation from the development site. Equipment used on-site during this phase would include backhoes, water trucks, haul trucks, and bulldozers. This phase would take approximately one (1) month to complete.

- *Grading*. This phase would involve the grading and excavation of the site and would include the finished grading of the project site. In addition, the building footings, utility lines, and other underground infrastructure would be installed during this phase. Equipment used on-site during this phase would include backhoes, water trucks, haul trucks, graders, trenching equipment, and bulldozers. This phase will take approximately one (1) month to complete.

- *Construction*. The erection of the main structural improvements would occur during this phase. During this phase, the building floor and walls would be constructed and the water lines, sewer lines, and other infrastructure connections would be completed. Equipment used on-site during this phase would include off-road trucks, cranes, fork-lifts, and compressors. This phase would take approximately nine months (9) to complete.

- *Paving*. The roadways and other hardscape areas would be paved during this phase. Equipment used on-site during this phase would include cement and motor mixers, pavers, rollers, and other paving equipment. This phase would take approximately one (1) month to complete.

- *Landscaping and Finishing*. This phase would involve the planting of landscaping, painting of the units, and the completion of the on-site improvements. Equipment used on-site during this phase would include off-road trucks, backhoes, fork-lifts, and compressors. This phase would take approximately two (2) months to complete.

[55] South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2020.4.0). The assumptions regarding the construction phases and the length of construction followed those identified above. As shown in Table 3-3, daily construction emissions would not anticipated to exceed the SCAQMD significance thresholds. The architectural coatings (paint) will be less than significant since they will be required to comply with SCAQMD requirements for low VOC content. The use of low VOC content paints will reduce the architectural coatings emissions by as much as 50%. Even with the use of the default values, the maximum daily emissions (50.27 pounds per day) are less than the daily thresholds (75 pounds per day).

Table 3-3
Estimated Daily Construction Emissions

Construction Phase	ROG	NO_2	CO	SO_2	PM_{10}	$PM_{2.5}$
Site Remediation On-site)	1.57	15.05	10.1	0.02	10.05	5.30
Site Remediation (Off-site)	0.03	0.02	0.34	0.15	0.07	0.02
Total Remediation	1.60	15.7	10.35	0.17	10.12	5.32
Site Preparation (on-site)	3.17	33.08	19.7	0.04	21.27	11.59
Site Preparation (off-site)	0.06	0.04	0.68	--	0.20	0.05
Total Site Preparation	**3.23**	**33.12**	**20.38**	**0.04**	**21.47**	**11.64**
Building Construction (on-site)	1.71	15.61	16.36	0.03	0.81	0.76
Building Construction (off-site)	0.38	1.92	4.05	0.02	1.28	0.36
Total Building Construction	**2.09**	**17.53**	**20.41**	**0.05**	**2.09**	**1.12**
Paving (on-site)	1.03	10.19	14.58	0.02	0.51	0.47
Paving (off-site)	0.05	0.03	0.52	--	0.17	0.04
Total Paving	**1.08**	**10.22**	**15.10**	**0.02**	**0.68**	**0.51**
Architectural Coatings 2023 (on-site)	50.22	1.30	1.81	--	0.07	0.07
Architectural Coatings 2023 (off-site)	0.06	0.04	0.63	--	0.20	0.05
Total Architectural Coatings 2023	**50.27**	**1.34**	**2.44**	**--**	**0.27**	**0.12**
Maximum Daily Emissions	**50.27**	**33.13**	**21.16**	**0.04**	**21.47**	**11.64**
Daily Thresholds	**75**	**100**	**550**	**150**	**150**	**55**

Source: CalEEMod V.2020.4.0.

The long-term air quality impacts associated with the proposed project include area source emissions include those generated by architectural coatings, consumer products, and landscape maintenance equipment. Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed project. 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 Basin, criteria pollutant emissions from off-site generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered. Project related operational air quality impacts are derived predominantly from mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the site vicinity. The analysis of long-term operational impacts summarized in Table 3-4, also used the CalEEMod computer model developed for the SCAQMD. The analysis summarized in Table 3-4 demonstrates that the operational (long-term) emissions will be below the SCAQMD's daily emissions thresholds.

Table 3-4
Estimated Operational Emissions in lbs/day

Emission Source	ROG	NO_2	CO	SO_2	PM_{10}	$PM_{2.5}$
Area-wide (lbs/day)	4.88	--	0.02	0.00	--	--
Energy (lbs/day)	0.11	1.05	0.88	--	0.08	0.08
Mobile (lbs/day)	4.90	5.73	54.90	0.13	13.17	3.57
Total (lbs/day)	**9.89**	**6.78**	**55.8**	**0.13**	**13.25**	**3.65**
Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**

Source: CalEEMod V.2020.4.0

Conclusions: The short-term and long-term air quality impacts would be less than significant.

Mitigation Measures: The analysis determined that the short-term and long-term air quality impacts would be below thresholds that are less than significant. While no specific mitigation is required, there are a number of SCAQMD regulations that were identified in Section 3.3.2.1 that would be adhered to that would further reduce the level of emissions. Conformance to these rules would further reduce impacts to less than significant.

Significance after Mitigation: The impacts would be less than significant.

3.3.4.3 Impact Analysis: The project's potential for exposing sensitive receptors to substantial pollutant concentrations.

The nearest sensitive receptors to the project site are the residential units located to the north of the project site along both sides of Fostoria Street (refer to Exhibit 3-3). To identify impacts to sensitive receptors, the SCAQMD recommends addressing Local Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific emissions. TLSTs only apply to short-term (construction) and long-term (operational) emissions at a fixed location and do not include off-site or area-wide emissions. The approach used in the analysis of the proposed project utilized a number of screening tables that identified maximum allowable emissions (in pounds per day) at a specified distance to a receptor. The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO_2; carbon monoxide (CO) emissions from construction and operations; PM_{10} emissions from construction and operations; and $PM_{2.5}$ emissions from construction and operations. The use of the "look-up tables" is permitted since each of the construction phases was assumed to involve the disturbance of less than five acres of land area on any given construction day. As indicated in the table, the proposed project will not exceed any LSTs based on the information included in the Mass Rate LST Look-up Tables. The analysis assumes that no more than 5 acres of land would be disturbed per day.

As indicated in Table 3-5, the construction LSTs would not be exceed at 25 meters from the property line where the nearest sensitive receptors are located.

EXHIBIT 3-3
AIR SENSITIVE RECEPTORS
Source: Blodgett Baylosis Environmental Planning

Table 3-5

Local Significance Thresholds Exceedance SRA12 for 5-Acres of Disturbance

Emissions	Project Emissions* (lbs/day)	Type	Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)				
			25	50	100	200	500
NO_2	45.63	Construction	**98**	94	101	111	139
NO2	3.29	Operations	**98**	94	111	111	139
CO	23.78	Construction/Operation	**630**	879	1,368	2,514	7,389
CO	9.27	Operations	**1,480**	1,855	2,437	3,897	9,312
PM_{10}	2.76	Operations	**4**	10	14	20	40
PM_{10}	20.65/9.63*	Construction	**13**	41	55	83	166
$PM_{2.5}$	0.76	Operations	**2**	3	4	7	21
$PM_{2.5}$	12.18/2.20*	Construction	**7**	10	15	27	86

*Second number denotes estimated emissions with the use of the aforementioned mitigation measures, such as watering three times per day.

Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards. These areas of high CO concentration are referred to as *hot spots*. Two variables influence the creation of a hot-spot and these variables include traffic volumes and traffic congestion. Typically, a hot spot may occur near an intersection that is experiencing severe congestion (a LOS E or LOS F). The SCAQMD stated in its CEQA Handbook that a CO hot spot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions. This additional peak hour traffic will not degrade any local intersection's level of service (LOS E or F). In addition, project-generated traffic would not result in the creation of a carbon monoxide hot-spot. As a result, no impacts on sensitive receptors are anticipated.

For example, as part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections resulting from 554 additional vehicle trips attributable to the project. Therefore, impacts would be less than significant.

The nearest driveway providing access to the loading areas will be located approximately 350 feet to the south of the nearest sensitive receptor (the homes located along Fostoria Street). In addition, the truck receiving docks and the loading and maneuvering areas will be located on the south side of the building more than 300 feet from the sensitive receptors. The majority of the diesel trucks travelling to and from the site will be employing either clean diesel or EV technology to reduce diesel particulates. The U.S. trucking fleet is transitioning to newer clean diesel technology

which translates into fuel savings, lower greenhouse gas emissions and a reduction in diesel particulate emissions. This newest generation of clean diesel trucks will have NOx emissions that are 99 percent lower than previous generations of larger trucks along with 98 percent fewer diesel particulate emissions, resulting in significant clean air benefits. Beginning in 2011, all heavy-duty diesel trucks sold had to meet NOx emissions of no more than 0.20 grams per brake horsepower hour (g/BHP-hr.). This is in addition to particulate emissions levels of no more than 0.01 g/HP-hr. established in 2007. The new more restrictive emissions requirements, together with the SCAQMD's regulations limiting truck idling times, will reduce potential impacts related to truck diesel emissions.

Conclusions: The project's impacts would be less than significant.

Mitigation Measures: No mitigation measures are required beyond those standard SCAQMD regulations.

Significance after Mitigation: The impacts would be less than significant.

3.3.4.4 Impact Analysis: The project's potential for resulting in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected would include those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. The proposed project would not include any of the land uses that have been identified by the SCAQMD as odor sources. These uses may include waste processing facilities, rendering plants, fiberglass manufacturing uses, chemical plants, and materials recycling facilities.

Once operational, the proposed project will be subject to the SCAQMD's Rule 402 that governs "nuisances, including odors. This rule states, "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The proposed project would not be permitted to generate or be a source of odors.

Conclusions: The project's potential for resulting in other emissions, including odors) would be less than significant.

Mitigation Measures: Once operational, the proposed project will be subject to the SCAQMD's Rule 402 that governs "nuisances, including odors. No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.4 BIOLOGICAL RESOURCES IMPACTS

This section describes the proposed project's impacts with respect to biological resources including the existing environmental setting with respect to existing biological resources, discusses Federal and local regulations and policies pertinent to this issue area, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address those impacts. The tree survey conducted and is provided in Appendix C.

3.4.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for having 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.

- The project's potential for having 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.

- The project's potential for having 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.

- The project's potential for interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors or impeding the use of native wildlife nursery sites.

- The project's potential for conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- The project's potential for conflicting with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.4.2 ENVIRONMENTAL SETTING

3.4.2.1 Regulatory Setting

This section summarizes key State and local regulations and programs related to biological resources impacts that apply to the proposed project.

- *Federal Endangered Species Act of 1973* The Federal Endangered Species Act (FESA) and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. The FESA defines species as "threatened" or "endangered" and provides

regulatory protection for listed species. The FESA provides a program for conservation and recovery of threatened and endangered species, and conservation of designated critical habitat that the USFWS has determined is required for the survival and recovery of these listed species. Section 4 of the FESA requires Federal agencies to prepare recovery plans for newly listed species unless USFWS determines such a plan would not promote the conservation of the species. Section 7 requires Federal agencies, in consultation with, and with the assistance of the Secretary of the Interior or the Secretary of Commerce, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. The USFWS and National Marine Fisheries Service (NMFS) share responsibilities for administering FESA. Regulations governing interagency cooperation under Section 7 are found at 50 CFR Part 402. The opinion issued at the conclusion of consultation would include a statement authorizing a take that may occur incidental to an otherwise legal activity. Section 9 lists those actions that are prohibited under FESA. Take of a species listed in FESA is prohibited. Section 9 of FESA prohibits take (i.e., to harass, harm, pursue, hunt, wound, kill, etc.) of listed species of fish, wildlife, and plants without special exemption. "Harm" is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or shelter. "Harass" is further defined as actions that create the likelihood of injury to listed species, resulting in significantly disrupting normal behavior patterns which include, but are not limited to, breeding, feeding, and shelter. Section 10 provides a means whereby a non-Federal action with a potential to result in the wake of a listed species could be allowed under an incidental take permit

- *Clean Water Act/Rivers and Harbors Act.* Section 401 requires that a project proponent for a Federal license or permit that allows activities resulting in a discharge to Waters of the U. S. (WUS) must obtain a State certification that the discharge complies with other provisions of CWA. The Regional Water Quality Control Boards (RWQCBs) administer the certification program in California. Section 402 establishes a permitting system for the discharge of any pollutant (except dredge or fill material) into WUS, commonly referred to as the National Pollutant Discharge Elimination System (NPDES) Permit process, described further below. Section 404 establishes a permit program, administered by the USACE, regulating the discharge of dredged or fill material into WUS, including wetlands. The extent of WUS is generally defined as the portion that falls within the limits of the OHWM, which typically corresponds to the two-year flood event. Wetlands, including swamps, bogs, seasonal wetlands, seeps, marshes, and similar areas are defined by USACE as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3[c](4)1; 40 CFR 230.3[o](iv)).2 Implementing regulations by USACE are found at 33 CFR Parts 320-330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines and were developed by the U.S. Environmental Protection Agency (U.S. EPA) in conjunction with USACE (40 CFR Parts 230). The Guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts. The Rivers and Harbors Act regulates placement of obstacles or structures within navigable waterways, including the area vertically beneath the ocean floor.

- *Migratory Bird Treaty Act (16 U.S.C. 701 through 719(c))* The Migratory Bird Treaty Act (MBTA) is the domestic law that affirms, or implements, the United States' commitment to four international conventions for the protection of a shared migratory bird resource. The MBTA makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds. The law also applies to the removal of nests occupied by migratory birds during the breeding season. The MBTA makes it unlawful to take, pursue, molest, or disturb these species, their nests, or their eggs anywhere in the United States.

- *California Environmental Quality Act (CEQA).* (Pub. Res. Code §21000 et seq.) (14 Cal.Code Regs. §15000 et seq. ["CEQA Guidelines"]) Section 15380. Although threatened and endangered species are protected by specific federal and State statutes, CEQA Guidelines §15380(b) provides that a species not listed on the federal or State list of protected species may be considered endangered, rare or threatened if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definition in the FESA and the section of the California FGC dealing with rare or endangered plants or animals. This section was included in CEQA primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on, for example, a candidate species that has not been listed by either USFWS or CDFW. Thus, CEQA provides an agency with the ability to protect a species from the potential impacts of a project until the respective government agencies have an opportunity to designate the species as protected, if warranted. CEQA also calls for the protection of other locally or regionally significant resources, including natural communities. Although natural communities have limited legal protection compared to plants and animals, CEQA calls for an assessment of whether any such resources would be affected and requires findings of significance if there would be substantial losses. Natural communities listed by CNDDB as sensitive are considered by CDFW to be significant resources and fall under the CEQA Guidelines for addressing impacts. Local planning documents such as general plans often identify these resources as well.

- *California Endangered Species Act (California State FGC §2050 et seq.)* The California Endangered Species Act (CESA) establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. The CESA mandates that State agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. There are no State agency consultation procedures under the CESA. For projects that affect both a State and Federally listed species, compliance with FESA would satisfy the CESA if the CDFW determines that the Federal incidental take authorization is "consistent" with the CESA under California State FGC §2080.1. For projects that would result in a take of a State-only listed species, the Project proponent must apply for a take permit under §2081(b).

- *California Native Plant Protection Act (California State FGC 1900 through 1913)* The CNPPA requires all State agencies to utilize their authority to carry out programs to conserve endangered and rare native plants. Provisions of the NPPA prohibit the taking of listed plants from the wild and require notification of the CDFW at least 10 days in advance of any change in land use. This allows CDFW to salvage listed plant species that would otherwise be destroyed. A project proponent is required to conduct botanical inventories and consult with CDFW during project planning to comply with the provisions of this Act and sections of CEQA that apply to rare or endangered plants.

- *Regional Water Quality Control Board.* Under Section 401 of the CWA, the RWQCB must certify that actions receiving authorization under Section 404 of the CWA also meet State water quality standards. The RWQCB also regulates waters of the State under the Porter-Cologne Act Water Quality Control Act (Porter-Cologne Act). The RWQCB requires projects to avoid impacts to wetlands if feasible and requires that projects do not result in a net loss of wetland acreage or a net loss of wetland function and values. The RWQCB typically requires compensatory mitigation for impacts on wetlands and/or waters of the State. The RWQCB also has jurisdiction over waters deemed isolated or not subject to Section 404 jurisdiction under the Solid Waste Agency of Northern Cook County v. Army Corps of Engineers decision. Dredging, filling, or excavation of isolated waters constitutes a discharge of waste to waters of the State and prospective dischargers are required to obtain authorization through an Order of Waste Discharge or waiver thereof from the RWQCB and comply with other requirements of Porter-Cologne Act.

- *South Gate General Plan, Green Element*. This Element of the General Plan provides goals, objectives, policies, and implementation actions on making South Gate a "green" city. The Element addresses parks, civic plazas, open space, rivers, trails, equestrian facilities, the conservation of natural resources, energy and climate change, and green building. This Element should be used in conjunction with the South Gate Parks and Recreation Master Plan, the Natural Hazard Mitigation Plan, and Street Tree Master Plan.

3.4.2.2 Existing Physical Setting

Currently, the majority of the site is paved over from the former industrial plant. However, the eastern portion of the site is undeveloped. There is a well-defined vegetated swale, which drains to the southeast corner of the site. The swale accepts runoff from the project site and offsite run-on from the north which drains to the south, then flows southeasterly. The swale ends near the southeast corner of the site where it appears that runoff ponds up then spills out into a landscape strip paralleling the Los Angeles River. This landscape strip has an existing headwall and 24" storm drain which collects the runoff from the site, areas north of the site, the northern portion of the railroad right of way, and the slope/landscape strip west of the Los Angeles River. This open space area is shown in Exhibit 3-4. The South Gate General Plan 2035 states that "there are no known threatened or endangered species and very sparse wildlife, though migratory or native birds may be found in natural areas such as South Gate Park or areas around the Los Angeles River."[56] A review of the California Department of Fish and Wildlife Bios Viewer for the South Gate Quadrangle indicated that there are five threatened or endangered species located or have the potential to occur within the South Gate Quadrangle.[57] These species are identified below and on the following pages along with a discussion of the potential to occur on the project site:

- The *coastal California gnatcatcher* is not likely to be found on-site due to the existing surrounding development and the lack of habitat suitable for the California gnatcatcher. The absence of coastal sage scrub, the coastal California gnatcatcher's primary habitat, further diminishes the likelihood of encountering such birds.[58]

- The *southwestern willow flycatcher* is not likely to be found on-site due to the surrounding urban development and the lack of habitat suitable riparian habitat for this bird species. The adjacent Los Angeles River channel is concrete-lined and is used for flood control.[59]

- The *least Bell's vireo* also lives in a riparian habitat, with a majority of the species living in San Diego County. As a result, it is not likely that any least Bell's vireos will be encountered in the project area due to the lack of riparian natural habitat in the surrounding area.[60]

[56] South Gate, City of. *South Gate General Plan 2035.* Green City Element. December 2009.

[57] California Department of Fish and Wildlife. *Bios Viewer*. https://map.dfg.ca.gov/bios/?tool=cnddbQuick. Website Accessed on December 21, 2018.

[58] Audubon. *California Gnatcatcher (Polioptila californica).* https://www.audubon.org/field-guide/bird/california-gnatcatcher.

[59] United State Geological Survey. *Southwestern Willow Flycatcher Habitat*. http://sbsc.wr.usgs.gov/cprs/research/projects/swwf/wiflhab.asp.

[60] California Partners in Flight Riparian Bird Conservation Plan. *Least Bell's Vireo (Vireo bellii pusillus).* http://www.prbo.org/calpif/htmldocs/species/riparian/least_bell_vireo.htm.

EXHIBIT 3-4
BIOLOGICAL RESOURCES
Source: Blodgett Baylosis Environmental Planning

- The *western yellow-billed cuckoo* is an insect-eating bird found in riparian woodland habitats. The likelihood of encountering a western yellow-billed cuckoo is low due to the level of development present within the City. Furthermore, the lack of riparian natural habitat further diminishes the likelihood of encountering populations of western yellow-billed cuckoos.[61]

- *California Orcutt grass* is found near vernal pools throughout Los Angeles, Riverside, and San Diego Counties.[62] As indicated previously, the project site is located in the midst of an urban area. There are no bodies of water located within the project site that would be capable of supporting populations of California Orcutt grass nor does the site have the capacity to form vernal pools during wet seasons.

3.4.2.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact on biological resources if it would:

- Result in 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;

- Result in 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;

- Result in a potential for having 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;

- Result in a potential for interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impeding the use of native wildlife nursery sites;

- Result in a potential for conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;

- Result in a potential for conflicting with the provisions of an adopted Habitat Conservation Plan, Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.4.2.4 ENVIRONMENTAL IMPACTS

3.4.4.1 Impact Analysis: The project's potential for having 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.

[61] US Fish and Wildlife Service. *Sacramento Fish and Wildlife Office, Public Advisory*. http://www.fws.gov/sacramento/outreach/Public-Advisories/WesternYellow-BilledCuckoo/outreach_PA_Western-Yellow-Billed-Cuckoo.htm.

[62] County of Los Angeles Department of Public Works. *Listed Species in the County of Los Angeles*. *http://dpw.lacounty.gov/pdd/bikepath/bikeplan/docs/App_C_Bio.pdf*.

Due to the current state of the project site and the level of development in the surrounding area, the project site does not offer a suitable habitat for any of the aforementioned rare and/or endangered species. There are no local or regional plans, policies, or regulations that identify any riparian habitat or other sensitive natural community, nor does the California Department of Fish and Wildlife identify any such habitat. The portions of the Los Angeles River that are located near to the project site are concrete-lined and do not offer suitable riparian vegetation for the aforementioned species. A review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper classifies the Los Angeles River as riverine but does not identify any wetlands in the project site.[63]

Conclusions: There would not be any impacts on this issue since there are no 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.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.4.4.2 Impact Analysis: The project's potential for having 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.

Due to the current state of the project site and the level of development in the surrounding area, the project site does not support riparian habitat or other sensitive natural community. There are no local or regional plans, policies, or regulations that identify any riparian habitat or other sensitive natural community, nor does the California Department of Fish and Wildlife identify any such habitat. The portions of the Los Angeles River and the Rio Hondo Channel that are near to the project site are concrete-lined and do not support riparian habitat or other sensitive natural community.

Conclusions: There would not be any impacts on this issue since the project would not result on any 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.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.4.4.3 Impact Analysis: The project's potential for having 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.

The western portion of the project site was formerly occupied by manufacturing buildings that have since been demolished. The eastern portion of the project site, located next to the Los Angeles River, is vacant and though it is a draiage swale. This landscape strip has an existing headwall and 24" storm drain which collects the runoff from the site, areas north of the site, the northern portion of the railroad right of way, and the slope/landscape strip west of the Los Angeles River. This area does not contain any wetland areas including, but not limited to, marsh, vernal pool, or coastal wetland.

[63] United States Fish and Wildlife Service. *National Wetlands Inventory*. https://www.fws.gov/Wetlands/data/Mapper.html.

Conclusions: There would not be any impacts on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.4.4.4 Impact Analysis: Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

As indicated previously, the South Gate General Plan includes the *Green Element*. This Element of the General Plan provides goals, objectives, policies, and implementation actions on making South Gate a "green" city. The Element addresses parks, civic plazas, open space, rivers, trails, equestrian facilities, the conservation of natural resources, energy and climate change, and green building. Key objectives include the following:

- *Objective GC 3.1: Improve access to and use of the Los Angeles River and Rio Hondo Channel. Policies:* The proposed project supports this objective with a new improved connection to the Los Angeles River Trail.

- *Policy 1. The City will capitalize on the Los Angeles River and Rio Hondo Channel as public amenities that can enhance access to open space, create a unique identity for the City and enhance economic development opportunities in the City*. The proposed project supports this policy with a new improved connection to the Los Angeles River Trail.

- *Policy 2. New development along the Los Angeles River and the Rio Hondo Channel should encourage access to and utilization of the rivers.* The proposed project supports this policy with a new improved connection to the Los Angeles River Trail.

- *Policy 3. The City should seek to develop attractive destinations, businesses, and resting points along and in close proximity to the Los Angeles River and Rio Hondo Channel*. The proposed project supports this policy with a new improved connection to the Los Angeles River Trail.

- *Policy 4. New development, redevelopment, landscaping, and infrastructure along the Los Angeles River and the Rio Hondo Channel should utilize xeriscaping and native plants and enhance riparian habitat, wherever feasible*. The proposed project's landscape plan supports this policy.

- *Policy 5. New development that may result in increased water pollution to the Los Angeles River or the Rio Hondo Channel will be required to mitigate the potential sources of pollution, especially pollution from stormwater runoff*. The proposed project's landscape plan supports this policy.

- *Policy 2. The City should protect any rare or endangered plants or wildlife that may be found in the City in the future*. The proposed project's landscape plan supports this policy.

- *Objective GC 5.3: Create "green" parking lots with trees and other landscaping in order to improve visual appearance and to minimize negative effects on the environment.* The proposed project's landscape plan supports this policy.

- *Policy 1. Large parking lots as part of new development or major renovations should be well landscaped with trees and other greenery and designed to hold and filter stormwater runoff, reduce heat island effects and create a comfortable pedestrian environment*. The proposed project's landscape plan supports this policy.

The proposed project would be constructed in compliance with the requirements of the City's General Plan. The City of South Gate General Plan includes goals, objectives, and policies related to the conservation of biological resources. The proposed project will be required to adhere to all pertinent requirements governing landscaping. No impacts would occur in this regard.

Conclusions: There are no Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applicable to the project site.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.4.4.5 Impact Analysis: The project's potential for conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The proposed project's construction would require the removal of the existing on-site trees to accommodate the demolition and subsequent demolition activities. With the site's development, landscaping would be provided along the property lines consistent with the Zoning Code.[64] The front building setback would be 10 feet, and the rear and side building setbacks would be 30 feet. The proposed project would provide 137,655 square feet of landscaping, which would be 10 percent of the project site's total land area. Landscaping would be provided around the perimeter of the project site, along the northern and western sides of the main building, and in the parking lots within the western and northern areas of the project site. The proposed landscaping would include varied tree species, shrubs, groundcover, and vines, with drought-tolerant plant species that would be consistent with the surrounding area. A 10-foot screen wall would be provided along the northern property line to create a barrier between the project site and the City of Cudahy residential area The building will be setback 85 feet from this screen wall. Additionally, the proposed project would include a new bike path connection to the Los Angeles River Trail via the extension of Patata Street to the east, which is located along the western side of the Los Angeles River.[65] Section 5.33.030 (Permit requirements) of the City of South Gate Municipal Code states the following:

> " No person, but for a person undertaking official business for the City of South Gate, shall plant, remove, relocate, damage, excessively prune or cut or encroach into the protected zone or any public tree within the city of South Gate without first obtaining a permit from the director of public works and paying the required fee. No such permit shall be valid for a period greater than ninety days after the date of its issuance and shall thereafter be null and void unless extended in writing by the director of public works."

A site inspection was performed to determine whether the site contains any trees deemed protected under the City of South Gate Municipal Code, Chapter 5.33 – Tree Preservation and Protection (refer to the Arborist Study included in Appendix C). Under that ordinance, the City requires that no person, except for a person undertaking official business for the City of South Gate, shall plant, remove, relocate, damage, excessively prune, or cut or encroach into the protected zone of any public tree within the City of South Gate without first obtaining a permit from the Director of

[64] City of South Gate. 2015. City of South Gate Comprehensive Zoning Code, 11.24.060 Light and Heavy Manufacturing (M2 & M3) Zones. March. Website: https://www.cityofsouthgate.org/DocumentCenter/View/1183. Accessed July 28, 2021.

[65] Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

Public Works and paying the required fee. A "public tree" is defined as any single or multi-stemmed plan normally reaching mature heights of 15 feet or more, regardless of its current level of maturity, with one-half or more of its trunk or branches on or above all public property. Ann Burroughs, associate Registered Consulting Arborist inspected the site on March 4, 2022. There are no trees on the site that met this criterion.[66] None of the trees that will be removed are "public trees".

Conclusions: There would be potentially significant impacts on migratory avian species related to tree removal.

Mitigation Measures: The following mitigation measure would be required to reduce the project's potential impacts related to tree removal impacts and migratory birds:

> *Biological Resources Mitigation Measure No. 1.* If clearing and/or construction activities will occur during the raptor or migratory bird nesting season (February 15–August 15), the project contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before construction activities. The qualified biologist shall survey the construction zone and a 500-foot buffer surrounding the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist.

Significance after Mitigation: The impacts would be less than significant.

3.4.4.6 Impact Analysis: The project's potential conflicting with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The project site is not subject to the provision of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As a result, the proposed project would not result in any impacts on this issue.

Conclusions: There would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[66] Seven Elk Ranch Design, Inc. Memorandum from to Mr. Michael Johnson from Kay J. Greely, Dated March 22, 2022.

3.5 CULTURAL RESOURCES IMPACTS

This section describes the proposed project's impacts with respect to specific cultural resources, specific historic resources, archaeological resources, and burials. This section discusses the existing environmental setting, the relevant Federal and local regulations and policies relative to cultural resources, and the potentially significant impacts that could result from construction and subsequent operation of the proposed project. In addition, this section and provides, where appropriate, mitigation measures to address those impacts that have been identified. A copy of the cultural resources study is provided in Appendix D.

3.5.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for causing a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines.

- The project's potential for causing substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines.

- The project's potential for disturbing human remains, including those interred outside of formal cemeteries.

3.5.2 ENVIRONMENTAL SETTING

3.5.2.1 Regulatory Setting

There are a number of existing regulations applicable to any new development that will be effective in further reducing potential cultural resources impacts. These regulations are considered to be standard conditions in that they are required regardless of whether an impact requires mitigation. Those regulations that will serve as standard conditions with respect to potential cultural resources impacts are listed below.

- *Historic Preservation Act*. Federal regulations for cultural resources are governed primarily by Section 106 of the National Historic Preservation Act (NHPA) of 1966. Section 106 of NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, *Protection of Historic Properties*, are found in 36 Code of Federal Regulations (CFR), Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places. The criteria for determining National Register Eligibility are found in 36 CFR Part 60, Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While Federal agencies must follow Federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations typically come into play in the private sector if a project requires a Federal permit or if it uses Federal money.

- *Public Resources Code Section 5024.1 and the California Register of Historical Resources* Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC §5024.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHL) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest (PHI) program, identified as significant in historical resources surveys or designated by local landmarks programs, may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the SHRC determines that it meets one or more of the following criteria (listed under PRC §5024.1(c)), which are modeled on NRHP criteria:

  Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

  Criterion 2: It is associated with the lives of persons important in our past.

  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.

  Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

  Under PRC §5024.1 and 14 CCR §4852(c), a cultural resource must retain integrity to be considered eligible for the CRHR. Specifically, it must retain sufficient character or appearance to be recognizable as a historical resource and convey reasons of significance. Integrity is evaluated with regard to retention of such factors as location, design, setting, materials, workmanship, feeling, and association. Cultural sites that have been affected by ground-disturbing activities often lack integrity because they have been directly damaged or removed from their original location, among other changes.

- *State Regulations*. The State of California historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA); Public Resources Code. A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, which is historically or archaeologically significant. Section 15064.5 of the CEQA Guidelines specifies criteria for evaluating the importance of cultural resources. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. CEQA, as codified at PRC Sections 21000 et seq., is the principal statute governing the environmental review of projects in the State. As defined in PRC Section 21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

  - Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;

  - Has a special and particular quality such as being the oldest of its type or the best available example of its type; and,

  - Is directly associated with a scientifically recognized important prehistoric or historic event or person.

- *Health and Safety Code, Sections 7050.5 and 7052* State Health and Safety Code (HSC) §7050.5, declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease, and the county coroner must be notified. HSC §7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives. More precisely, if human remains are encountered, State HSC §7050.5 states that: a) "Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.995 of the Public Resources Code. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (l) of Section 5097.946 of the Public Resources Code or to any person authorized to implement Section 5097.987 of the Public Resources Code. b) 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 or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code8 , that the remains are not subject to the provisions of Section 274919 of the Government Code or any other related 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 for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.9810 of the Public Resources Code. 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. c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or 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."

- *City of South Gate Municipal Code*. The Municipal Code, Chapter 7.68, governs cultural resources in the City. The primary purpose of this chapter is to protect, enhance and perpetuate areas, streets, places, buildings, structures, outdoor works of art, natural features and other similar objects which are reminders of past eras, events, and persons important in local, state or national history.

3.5.2.2 Physical Setting

Prehistoric Setting

The first known projectile points in North America have been dated from 13,000 years Before Present (BP), with lanceolate fluted points (referred to as Clovis points) first found in in sites located in central and eastern North America and stemmed projectile points from sites in areas of western North America that were not glaciated. The oldest California radiocarbon date for a site in California (as of 2007) was from archaeological site dated as early as 13,500 years BP. The radiocarbon date corresponds to the period of fluted points that have been found throughout California although projectile points and other chronologically and culturally informative materials are absent from some of the samples. During the early Post-Glacial Period (after 8,500 BP) the Southern California climate became warmer and drier. Groundstone artifacts that include manos and metates correspond to the Early Period. The Early Period in Southern California begins as early or earlier than 8,000 BP and ends by about 2,800 BP. The Early Period corresponds to the earliest known sites in Southern California with year-round habitation and cemeteries. Manos and metates consist of a variety of types. Most annual and biennial wild seed plant types in Southern California are best adapted for warm and dry environments which is a summer seed source). Annual and biennial seed crops are highly reliable, nutritious, and productive. Annual and biennial seed producers are also, diverse and afford reliable seed

production throughout the year. Compared to later periods, utilitarian artifacts are most frequently found with Early Period burials.

Manos and metates are "kitchen tools" and concentrate within Early Period habitation sites in Southern California. Other kinds of lithics that correspond to the Early Period include many kinds of core tools (e.g., hammers, choppers, and scraper planes), knives, bifaces, scrapers (many types), gravers, burins, dart points, and compound bone fishhooks. Sedentism apparently increased in areas with abundant resources that were available for longer periods. Arid inland regions and offshore desert islands (e.g., San Nicolas Island) provided less opportunity for long-term residence without trade and possibly for more mobile subsistence. The Early Period ends about 2,800 BP (King 1990)

The Middle Period lasted from about 2,800 BP to 750 BP (King 1990). Excavated assemblages retain many attributes of the Early Period but with more diverse artifact types. Middle Period sites can contain large-stemmed or notched small projectile points suggestive of bow and arrow use, especially near the end of the Period, and the use of portable grinding tools continued. Intensive use of mortar and pestles signaled processing of acorns as the primary vegetative staple as opposed to a mixed diet of seeds and acorns. Because of a general lack of data, neither the settlement and subsistence systems nor the cultural evolution of this Period are well understood, but it is very likely that the nomadic ways continued. It has been proposed that sedentism increased with the exploitation of storable food resources, such as acorns, but coastal sites from the Period exhibit higher fishing activity than in previous periods. The first permanently occupied villages make their appearance in this Period.

Extending from 750 BP to Spanish Contact in 1769, the Late Prehistoric Period includes changes in trade networks and political and secular economic subsystems. There was also a differentiation of types of political economies. Exploitation of marine resources continued to intensify. Assemblages characteristically contain projectile points, and toward the end of the Period the size of the points decreased and notched and stemmed bases appeared, which implies the use of the bow and arrow. Use of personal ornaments such as shell beads, were widely distributed east of the coast, suggesting well-organized and codified trade networks. Additional assemblages in this Period included steatite bowls, asphaltum, grave goods, and elaborate shell ornaments. The use of bedrock milling stations was widespread during this horizon. Increased hunting efficiency and widespread exploitation of acorns provided reliable and storable food resources. Village size increased during this time, and some of these villages may have held 1,500 or more residents. Analyses of skeletons showed that the first signs of malnutrition appeared in this Period, signaling greater competition for food resources.

The earliest part of this Period may have seen an incursion of Cupan-Takic speakers from the Great Basin may have replaced the Hokan speakers in the area. At the time of Spanish conquest, the Cupan-Takic speakers were distributed throughout Orange County, western Riverside County, and the Los Angeles Basin (Gabrieleño, Juaneño, and Cahuilla peoples). Serrano-Takic speakers are now represented by the Serranos in the San Bernardino Mountains. At the time of Spanish conquest, local indigenous groups were composed of constantly moving and shifting clans and cultures. Early ethnographers applied the concept of territorial boundaries to local indigenous groups purely as a conceptualization device, and the data was based on fragmented information provided to them from second-hand sources. At least one Native American group, the Gabrieleño is known to have occupied or utilized resources within the vicinity of the project site at different points in history.

The Gabrieleño ethnographic accounts of Native Americans indicate that the Gabrieleño once occupied the region that encompasses the project area. At the time of contact with Europeans, the Tongva were the main occupants of the southern Channel Islands, the Los Angeles Basin, much of Orange County, and extended as far east as the western San Bernardino Valley. The term "Gabrieleño" came from the group's association with Mission San Gabriel Arcángel, established in 1771. However, today the group prefers to be known by their ancestral name, Tongva. The Tongva are believed to have been one of the most populous and wealthy Native American tribes in Southern California prior to

European contact, second only to the Chumash. The Tongva occupied numerous villages with populations ranging from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Tongva society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. By the late 18th Century, the Tongva population had significantly dwindled due to the introduction of diseases and dietary deficiencies. Tongva communities near the missions disintegrated as individuals succumbed to Spanish control, fled the region, or died. Later, many of the Tongva fell into indentured servitude to Anglo-Americans. By the early 1900s, few Tongva people had survived and much of their culture had been lost though by the 1970s, a revival of the Tongva culture began which continues today with growing interest and support.

Historic Setting

The first Europeans to pass through the region, what is modern day Los Angeles County, was Captain Gaspar de Portola, during the Portola Expedition. Portola was accompanied by Father Juan Crespi, who played a central role in mapping the early routes of California. Portola and his expedition arrived in present day San Gabriel Valley on July 30, 1769, with a 64-person garrison, before continuing their route to Monterey Bay. In 1771, the region was visited by Father Francisco Garces, who arrived at modern day San Gabriel Valley, in search of mission sites. His trek from Colorado to modern day Los Angeles County became the main overland route during the Spanish Period. On January 8, 1774, Juan Bautista de Anza, accompanied by Father Garces and Father Juan Diaz, engaged in the De Anza Expedition whose goal was to establish a colony and scout locations for Spanish Missions. Reaching Mission San Gabriel Arcángel, de Anza and 30 Spanish families formed one of the first colonies in California (San Diego and San Jose supersede Mission San Gabriel), paving the way for the establishment of El Pueblo de la Reina de Los Angeles Sobre el Rio de la Porciuncula. As the influence of Mission San Gabriel grew, so did the land that it controlled. At its height, Mission San Gabriel controlled roughly 1,500,000 acres of land, extending from the ocean to the San Bernardino Mountains.

In 1821, Mexico overthrew Spanish rule and the monopoly that the missions had in the area began to decline. By 1833, the Mexican government passed The Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings. In an act of rebellion against The Secularization Act, Mission fathers ordered the slaughter of over 100,000 cattle (laalmanac.com 2020). Following The Secularization Act, the Mexican government initially planned to redistribute the land to the Native Americans; instead, they were redistributed to prominent citizens. The large ranchos became important financial and social centers with the focus going toward cattle and agriculture. The prosperity in the region attracted Americans from the east to the region seeking to make their own fortune. The influx of American settlers raised tensions in the region eventually leading to the Mexican American War (1846-1848), with Mexico ceding its northern territories to the United States after the Treaty of Guadalupe Hidalgo.

Los Angeles County was incorporated on February 18, 1850, as one of the original 27 counties that were incorporated following the annexation of California to the United States. Prior to European contact, Los Angeles County was originally inhabited by the Ventureño, Gabrieleño, and Fernandeño tribes. The first European to enter present day Los Angeles County was Captain Gaspar de Portola, who entered the region in 1769 in what is known as the Portola Expedition. The party was on route to Northern California from San Diego in an excursion to claim the Southern and Northern California for Spain (nps.gov 2019). This was followed the establishment of the first community centered around Mission San Gabriel, which was founded by Father Junipero Serra in 1771. 10 years after the establishment of the mission, a group of 10 poblano families, recruited from Mexico, settled in a spot selected by Alta California Governor Felipe de Neve in effort to establish a new pueblo. The name of the new pueblo would be El Pueblo de la Reyna de Los Angeles (lacounty.gov 2020). The new settlement started off small, however, after the establishment of Mission San Fernando Rey de España in 1797 in the northern San Fernando Valley, drew an influx of settlers into the region. After Mexico gained its independence from Spain, trade with the United States became much more frequent

as did the trade with the vessel that docked off San Pedro Harbor. During this Period, the region experienced a growth in commerce and population and by the 1840s, Los Angeles was the largest town in Southern California. After the annexation of California and the discovery of gold in the hills southwest of the Antelope Valley, the population of Los Angeles County grew by the thousands. The exponential growth continued when gold was found in the mountains north of Los Angeles, bringing industry, trade, and commerce to the several communities that had formed. After the end of the Civil War, Los Angeles County had grown to 34,520 square miles, reaching the banks of the Colorado River; however, as counties continued to be established, portions of Los Angeles went to Kern County (1851), San Bernardino (1853), and Orange County (1889). Following the incorporation of Los Angeles County, the City of Los Angles became its first city and its county seat in 1850.

The late 1860s saw a population boom as the marketing to "Go West" caught on. With the completion of the Southern Pacific Railroad in 1880 and the Santa Fe Railroad in 1886, thousands of people came to Los Angeles County, purchased land, and re-sold it thus creating a booming real estate industry. However, after the collapse of financial growth in 1889, many Los Angelenos were forced to sell and/or abandon their homes. The mass exodus was short lived, as the event prompted the creation of the Chamber of Commerce, which campaigned to bring citizens back into the county. The new settlers subsequently benefited from prime real estate as well as fully formed local irrigation districts and numerous civic improvements. As more cities began to form within Los Angeles County, so did industry and population. The first motion picture studio to open was the Nestor Film Company, which opened its doors in 1911 in Hollywood. By 1930, the motion picture industry was a fully established force in the region. The establishment of Long Beach in 1911 and San Pedro Harbor and the several connecting railroad lines, facilitated the distribution of imported and local goods. Today there are 88 cities within the county and an additional 140 unincorporated communities, with a total population of 10,039,107 as of 2019 (census.gov 2020).

Located in southeastern Los Angeles County, the area that would become the City of South Gate was a 30,000-acre land grant given to Antonio Maria Lugo and his father by King Ferdinand VII of Spain in 1810 for their family's military service. Known as Rancho San Antonio, the grant was turned into a ranch focusing on cattle farming and agriculture. The original land grant was passed along and subdivided between descendants of the Lugo family. By 1870, much of the original Rancho San Antonio was parceled into 40-acre tracts. As the size of individual holdings decreased, agriculture, particularly fruit orchards along with cauliflower, beets, barley, beans, and dairy farms replaced cattle ranching by the 1880s. The earlier discovery of gold in Los Angeles County brought an influx of migrants to the region. This combined with the completion of the Southern Pacific Railroad, the Santa Fe Railroad, and a rapidly growing Los Angeles meant that real estate prices in the surrounding communities soared as demand for housing increased. On September 23, 1917, Charles B. Hooper, a realtor, purchased large tracts of agricultural land to develop into housing. From the postwar World War II period to today, the City of South Gate continues to be a vibrant working class community home to 98,633 persons, many of whom work in local industries or commute to the larger Los Angeles metropolitan area.

3.5.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines;

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines; or,

- Cause a substantial disturbance of human remains, including those interred outside of formal cemeteries.

3.5.4 ENVIRONMENTAL IMPACTS

3.5.4.1 Impact Analysis: The project's potential for causing a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines.

On October 12, 2021, a records search for the project site and a 0.5-mile radius beyond the project boundaries was conducted at the SCCIC located at California State University, Fullerton. The current inventories of the NRHP, the CRHR, the CHL list, the PHI list, and the California Built Environment Resource Directory (BERD) for Los Angeles County were also reviewed to determine the existence of previously documented local historical resources. The results of the records search indicate that two historic resources have been recorded within 0.5- mile of the project site. Table 3-6 identified those recorded sites and studies that have been recorded within 0.5 miles of the project site. As indicated in the table, there are no recorded sites within the project boundaries. In addition, seven area-specific survey reports are on file within 0.5-mile radius; one report (LA-11993) addresses the project site, and two reports (LA-08255 and LA-04834) are immediately south of the project boundaries (Table 3-6). This indicates that the project site has previously been surveyed for cultural resources. SCCIC records search results can be found in Appendix C.

Table 3-6
Cultural Studies and Sites in the Vicinity of the Project Site

Report No.	Report Title	Author and Date
LA-08255	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II	Cindy Arrington and Nancy Sikes (2006)
LA-04834	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties	Shahira Ashkar (1999)
LA-07616	Cultural Resource Records Search and Site Visit Results for T-Mobile Telecommunications Facility Candidate La03347a (firestone/Atlantic), 8660 Atlantic Avenue, South Gate, Los Angeles County, California	Wayne H. Bonner (2006)
LA-08255	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II	Cindy Arrington and Nancy Sikes (2006)
LA-10324	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33923C (Cudahy Park), 5220 Santa Ana Street, Cudahy, Los Angeles County, California	Wayne H. Bonner (2006)
LA-11918	Draft Environmental Impact Report for the Firestone Boulevard/Atlantic Avenue Intersection Improvement Project	Gary Schalman (2007)
LA-11993	Finding of No Adverse Effect for the Proposed Interstate 710 Corridor Project Between Ocean Boulevard and the State Route 60 Interchange	Laura O'Neil (2012)

Source: South Central Coastal Information Center (SCCIC) Records Search. October 7, 2021.

A review of 20 historic aerial photographs from 1954 to 2018 indicate that from the earliest aerial in 1954 until the present, the project site was previously developed for industrial use. The areas surrounding the project site consist of industrial and commercial properties and residential neighborhoods to the north of the project. The Los Angeles River is east of the project boundaries and the surroundings areas were developed sometime before 1954. In accordance with CEQA Guidelines, the site was assessed for the project's potential for an adverse impact on known and potential cultural resources at the project site. The NAHC Sacred Lands File search reported negative results for Native American cultural resources.

Conclusions: There would not be any impacts on historic resources since no such resources have been documented within the project site boundaries.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.5.4.2 Impact Analysis: The project's potential for having a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines.

On August 12, 2021, FCS sent a request to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response was received on October 12, 2021, indicating that the Sacred Lands File search failed to locate the presence of Native American cultural resources within the project site. The NAHC included a list of eight tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by implementation of the proposed project are addressed, a letter containing project information and requesting additional information was sent to each tribal representative on October 15, 2021. One response was received on October 15, 2021, from the Gabrieleño Band of Mission Indians-Kizh Nation requesting Lead Agency contact information for the City of South Gate. No additional responses have been received to date. Correspondence related to the NAHC record searches and tribal representatives can be found in Appendix C

The site was surveyed on January 14, 2022 to identify the potential for unrecorded cultural resources to be present onsite. Two-thirds of the project site was developed and was the former location of Armstrong Flooring, Inc which has since been demolished. The remaining section of the project site is composed of undeveloped land. The survey team split the survey into two sections, first surveying the foundations of the demolished structures, followed by surveying the undeveloped section of the project site. The first part of the survey began on the northwestern corner of the project site, using north–south transects spaced at 15-meter intervals, whenever possible, and moving southeast. The southwestern section of the project site was used as a parking lot and access point to the former factory. As the survey moved east, the foundations and scattered debris of a demolished office building and a distribution center remained. The debris was investigated; however, no archaeological resources with visible diagnostic markers were present. The undeveloped section of the project site is bordered by a security fence to the west and the Los Angeles River to the east. The survey in the undeveloped section started in the northwest corner and followed a northeast– southwest transects spaced at 15-meter intervals, whenever possible, and moving southeast. The project site was relatively flat grassy area, with soil visibility of native soils ranging from 5 to 15 percent in areas where bioturbation activities had taken place. Soil composition consisted of dark yellowish brown silty sand. To the extent possible, all areas of the project site were inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. No additional prehistoric or historic resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert, etc.) were found within the project site.

Survey conditions were documented using digital photographs and field notes. During the survey, The survey team examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics. No additional resources were encountered.

Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, the survey considered the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be low to moderate. The results from the NAHC Sacred Lands File search were negative for the presence of TCRs within the project site. No prehistoric resources were identified during the pedestrian survey. The cultural resources study prepared for the proposed project recommends that an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, be present to monitor the site during the initial removal of asphalt, grubbing, and prior to grading and trenching of the site to check for the inadvertent exposure of cultural materials. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist. Full-time archaeological monitoring is not recommended at this time. Standard procedures for the inadvertent discovery of human remains and cultural resources should be followed.

Conclusions: Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, FCS considers the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be low to moderate. The results from the NAHC Sacred Lands File search were negative for the presence of TCRs within the project site. No prehistoric resources were identified during the pedestrian survey; however, the presence of unrecorded building foundations within the project boundaries increase the possibility that subsurface undiscovered cultural resources may be encountered and impacted by construction activities. As a result, the impact would be potentially significant and mitigation is required.

Mitigation Measures: The following mitigation measure would be required to reduce the project's potential impacts related to potential unknown archaeological resources:

Archaeological Resources Mitigation Measure No. 1. an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, be present to monitor the site during the initial removal of asphalt, grubbing, and prior to grading and trenching of the site to check for the inadvertent exposure of cultural materials. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist. Full-time archaeological monitoring is not recommended at this time. Standard procedures for the inadvertent discovery of human remains and cultural resources should be followed. As indicated previously, *Health and Safety Code, Sections 7050.5 and 7052* State Health and Safety Code (HSC) §7050.5, declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease, and the county coroner must be notified.

Significance after Mitigation: The impacts would be less than significant.

3.5.4.3 Impact Analysis: The project's potential for substantial disturbance of human remains, including those interred outside of formal cemeteries.

As indicated previously, the site was formerly developed as an industrial use. The nearest potential cemetery location is located on the east side of the Rio Hondo Channel approximately 2,000 southeast of the project site. This cemetery was affiliated with the "Poor Farm" which did have its own cemetery. Most references indicated the burials had been

moved following a major flood along the Rio Hondo through there was one reference that stated the following, "When many patients died, they were buried in paupers' graves at the southwest corner of what is now Downey, between Garfield Avenue and the Union Pacific Railroad tracks." This area generally includes the Los Angeles County Public Works facility. Two potential village sites are found in the area: Chokiishnga and Huutnga. Often, the Europeans burials were in close proximity to older Indian burial sites. Finally, the 1888 and 1902 topographic maps did not identify any cemetery.

There are no other cemeteries located within or adjacent to the project site project site boundaries.[67] The proposed project will be restricted to the designated project site and will not affect any dedicated cemeteries. In addition, the proposed construction is not likely to neither discover nor disturb any on-site burials due to the level of urbanization present and the amount of disturbance sustained to accommodate the surrounding development. While the project site is situated near the Los Angeles River, its slope, composition, and proximity to known historic sites would suggest a low to moderate potential for unanticipated buried cultural resources to be impacted by project construction.

Conclusions: There is always the possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. Should this occur, Section 7050.5 of the California Health and Safety Code applies, and the following procedures shall be followed. In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required.
2. If the Coroner determines the remains to be Native American, the Coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.
3. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project area in a location not subject to further subsurface disturbance:
4. If the NAHC is unable to identify a most likely descendant, or the most likely descendant failed to make a recommendation within 48 hours after being notified by the Commission or if the descendant identified fails to make a recommendation; or if the landowner or his authorized representative rejects the recommendation of the descendant, a , and the mediation by the NAHC fails to provide measures acceptable to the landowner.

Mitigation Measures: No mitigation measures are required. In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed.

Significance after Mitigation: No significant impacts would result with adherence to the aforementioned standard condition.

[67] Google Earth. Website accessed August 28, 2022.

3.6 ENERGY IMPACTS

This section describes the proposed project's impacts with respect to energy consumption. This section discusses the existing environmental setting, discusses Federal and local regulations and policies pertinent to this issue, assesses the potentially significant impacts that could result from implementation of the proposed project and, where appropriate, provides, where appropriate, mitigation measures to address those impacts.

3.6.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of a NOP to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential impacts for causing a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.
- The project's potential impacts for causing a conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

3.6.2 ENVIRONMENTAL SETTING

3.6.2.1 Regulatory Setting

There are a number of existing regulations applicable to any new development that will be effective in further reducing potential energy-related impacts. These regulations are considered to be standard conditions in that they are required regardless of whether an impact requires mitigation. Those regulations that will serve as standard conditions are listed below.

- *State of California Code of Regulations, Title 24.* The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ design measures to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Future improvements, including the electrical upgrades, will conform to all state and local building code and lighting regulations. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2016 Title 24 standards are 28 percent more efficient than previous standards for residential development. The standards offer developers better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. The 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020, would promote photovoltaic systems in newly constructed residential buildings and additional lighting standards. With rooftop solar electricity generation, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards.5 With the new lighting standards, nonresidential buildings would use 30 percent less energy than buildings built under the 2016 standards.

- *California Green Building Standards* The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a Statewide mandatory

construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2019 and went into effect January 1, 2020.

- *City of South Gate General Plan*. The Green Element of the City's General Plan includes a number of policies that specifically address Green building measures which is a term used to refer to buildings that have a reduced impact on the natural environment. These objectives and policies are listed below:

  Objective GC 6.1: Increase the use of green techniques in new buildings, new building sites and building remodels and retrofits.

  Policy 1. All new municipal buildings should meet or exceed silver in the appropriate LEED Rating System, or a comparable green building standard.

  Policy 2. The City should encourage green building techniques efforts in single-family homes as well as in new municipal, commercial, mixed-use or multifamily residential projects.

  Policy 3. The City should encourage and create incentives for green building techniques in existing building retrofits as well as new buildings.

  Policy 4. The City should emphasize design for water conservation in its green building efforts.

  Policy 5. New buildings should meet or exceed California Title 24 energy efficiency requirements.

  Policy 6. When feasible or required by law, new development should utilize Low Impact Design (LID) features, including infiltration of stormwater, but LID should not interfere with the City's goals of infill development and appropriate densities as defined in the Community Design Element.

  Policy 7. The City should assess all new development's use of green building techniques as a formal stage of design review.

  Policy 8. The City may finance energy efficiency retrofits and on-site renewable energy installation through a local assessment district or provide administrative or financial support in other ways.

  Policy 9. On an ongoing basis, city staff should be trained to implement the green building program and to provide advice and expertise about green building to residents, particularly small-scale developers or homeowners that may have less access to green building expertise.

3.6.2.2 Physical Setting

Southern California Edison (SCE) provides electrical services in the City of South Gate through State-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including

cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, generation of electricity is usually not tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatts (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy produced by a unit; minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours, or gigawatt-hours.

The Southern California Gas Company provides natural gas services to the City of South Gate. Natural gas is a hydrocarbon fuel found in reservoirs beneath the earth's surface and is composed primarily of methane. It is used for space and water heating, process heating and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in coming years because it is a relatively clean alternative to other fossil fuels like oil and coal. In California and throughout the western United States, many new electrical generation plants that are fired by natural gas are being brought online.

Energy usage is typically quantified using the British Thermal Unit (Btu). Total energy usage in California was 7,881 trillion Btus in 2017 (the most recent year for which this specific data is available), which equates to an average of 200 million Btus per capita. Of California's total energy usage, the breakdown by sector is 39.8 percent transportation, 23.2 percent industrial, 18.9 percent commercial, and 18.1 percent residential. Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use. In 2019, taxable gasoline sales (including aviation gasoline) in California accounted for 15,338,758,756 gallons of gasoline.

3.6.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact on energy if it would:

- Cause a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; or,

- Cause a conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

3.6.4 ENVIRONMENTAL IMPACTS

3.6.4.1 Impact Analysis: The project's potential impact for causing a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

The proposed project will have a total floor area of 424,220 square feet of floor area. The main building's footprint would be 435,420 square feet and would consist of corporate offices, a warehouse, storage and cooler space, as well as mezzanine space. There would also be a 45,000-square-foot office located in the southwestern corner of the main building. The warehouse portion of the main building would consist of a loading and storage area, a total of 22,000 square feet of 36° cooler storage, and a total of 134,400 square feet of 60° cooler storage.[68] The second, smaller building would consist of 16,173-square-feet of floor area. This building would be truck maintenance workshop that would be located at the southeast corner of the project site.[69] The project will include 58 EV charging stations for

[68]Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[69] Ibid.

automobiles, 96 EV charging stations will be installed at occupancy and 62 EV charging stations for future zero carbon delivery vehicles. In addition, each dock high loading door would be provided with an electrical source/plug-in installed for EV trucks. Additionally, 69 stalls would be striped for Clean Air Vehicle vanpool/carpool/low-emitting fuel-efficient vehicles.

During construction, the proposed project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Fossil fuels used to power construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment greater than 150 horsepower (hp), shall comply with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 emissions standards and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes.

Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Additionally, construction building materials could include recycled materials and products originating from nearby sources in order to reduce costs of transportation. The proposed project's fuel consumption from construction would be 45,418 gallons. Further, as discussed above, project construction equipment would be required to comply with the latest regulations for engine emissions standards set forth by EPA, CARB, and/or the South Coast Air Quality Management District. It should be noted that construction fuel use is temporary and would cease upon completion of construction. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur.

Table 3-7 provides an estimate of the daily fuel consumed by vehicles traveling to and from the project site. As indicated in Table 3-7, operation of the proposed project is estimated to consume approximately 187,055 gallons of fuel per year.

Table 3-7
Proposed Project's Energy Consumption

Energy Type	Annual Energy Consumption
Electrical Consumption	1,490 MWhrs
Natural Gas Consumption	10,788 Therms
Automotive Fuel Consumption	
Project Construction	45,418 gallons
Project Operations	187,055 gallons

Source: California Emissions Estimator Model (CalEEMod v. 2020.40)

It should be noted that the project would comply with all applicable Federal and State fuel efficiency standards. Furthermore, per the 2019 Title 24 Building Energy Efficiency Standards and 2019 CALGreen Code, the project would include the following that would further reduce transportation-related energy consumption: The project will include 58 EV charging stations for automobiles, 96 EV charging stations will be installed at occupancy and 62 EV charging stations for future zero carbon delivery vehicles. In addition, each dock high loading door would be provided with an electrical source/plug-in installed for EV trucks. Additionally, 69 stalls would be striped for Clean Air Vehicle vanpool/carpool/low-emitting fuel-efficient vehicles. In addition, each dock high loading door, an electrical source/plug-in will be installed for EV trucks. Additionally, 69 stalls would be striped for Clean Air Vehicle vanpool/carpool/low-emitting fuel-efficient vehicles. As a result, the impacts would be less than significant.

Conclusions: The proposed project's impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: The impact would be less than significant.

3.5.4.2 Impact Analysis: The project's potential impacts for causing a conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

The project would comply with the 2019 Title 24 and CALGreen efficiency standards, which would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, water efficient fixtures, photovoltaic panels, as well as green building standards. Adherence to the Title 24 and CALGreen requirements will ensure conformance with the State's goal of promoting energy, water, and lighting efficiency, and the City's goal to purse sustainability and resilience.

Since the proposed project would comply with the 2019 Title 24 and CALGreen efficiency standards, which would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, water efficient fixtures, photovoltaic panels, as well as green building standards. This which would reduce energy usage by 30 percent compared to the 2016 Title 24 standards for the development site and by 52 percent compared to the 2016 Title 24 standard. As a result, the impacts would be less than significant.

Conclusions: The proposed project's impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: The impacts would be less than significant.

3.7 GEOLOGY & SOILS IMPACTS

This section describes the proposed project's impacts with respect to geology, discusses Federal and local regulations and policies pertinent to geology and seismic hazards, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address those impacts. A copy of the geotechnical, grading, and soils studies that were prepared for the project site are provided in Appendix E.

3.7.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential impacts for directly or indirectly, causing potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.

- The project's potential impacts for resulting in substantial soil erosion or the loss of topsoil.

- The project's potential impacts for being 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.

- The project's potential impacts for being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property.

- The project's potential impacts for having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

3.7.2 ENVIRONMENTAL SETTING

3.7.2.1 Regulatory Setting

There are a number of Federal and State agencies involved in the development, implementation, and enforcement of regulations related to geology and seismic safety. The regulatory sources governing geology and soils include the following:

- *City of South Gate General Plan.* The South Gate General Plan, as part of its Safety Element along with the other General Plan Elements established objectives, policies, and implementation actions to reduce the damaging effects of earthquakes. A basic and important responsibility of a local government is to protect the safety and well-being of community members. One of the ways the City of South Gate fulfills this responsibility is through its General Plan. The General Plan, which is required by state law (California Government Code Section 65300), guides the long-term physical development of the city and reflects the community's intentions about land use, pedestrian and vehicular circulation, housing, conservation, open

space, noise, and safety. The Safety Element of the General Plan sets forth long-range city goals, policies, and actions to protect people and property from natural and human-caused hazards.

- *Local Hazard Mitigation Plan*. Public safety planning generally focuses on how an agency or community members will prepare for, respond to, and/or recover from a disaster. Hazard mitigation planning focuses on how the impact of a disaster might be lessened. The City has updated and adopted the South Gate Local Hazard Mitigation Plan (LHMP) alongside this Safety Element. The LHMP includes an assessment of the City's risk related to natural hazard impacts such as drought, seismic events, extreme heat, and flooding. The LHMP also includes a comprehensive set of actions the City will complete to mitigate, or reduce, the impacts of those hazards.

- *The California Building Code (CBC)* The CBC provides procedures for earthquake resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. The seismic design parameters presented below are based on the soil profile and the proximity of known faults with respect to the subject site. Based on standards in place at the time of the various studies, the proposed development is expected to be designed in accordance with the requirements of the 2019 edition of the CBC, which was adopted on January 1, 2020.

3.7.2.2 Physical Setting

The City of South Gate is located in a seismically active region (refer to Exhibit 3-6). Many major and minor local faults traverse the entire Southern California region, posing a threat to millions of residents, including those who reside in the City. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.[70] A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of South Gate is not on the list.[71] The Avalon-Compton Fault is the closest known fault to the project site. This fault is located 4.7 miles to the southwest.[72] The project site is not located within the fault zone of the Avalon-Compton Fault (refer to Exhibit 3-5). According to the United States Geological Survey (USGS), liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. Although the project site is located in an area that is subject to liquefaction (refer to Exhibit 3-5), the proposed project involves modern construction techniques that will reflect the latest building codes.

According to the California Department of Conservation. all of South Gate is considered at an elevated risk for liquefaction due to the soil types that underlie the site (artificial fill and natural alluvium) and a high-water table (less than 40 feet below the surface). The generally flat topography of South Gate indicate that underlie the sites that the City does not have an elevated risk associated with landslides. However, the community faces the possibility of small landslides along the Los Angeles River, drainage channels, or other areas where steep slopes occur.

[70] California Department of Conservation. *What is the Alquist-Priolo Act*. http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx.

[71] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010*. https://www.conservation.ca.gov/cgs/Pages/Earthquakes/affected.aspx.

[72] Toll-Free Airline. *Los Angeles County Public and Private Airports, California.* http://www.tollfreeairline.com/california/losangeles.htm.

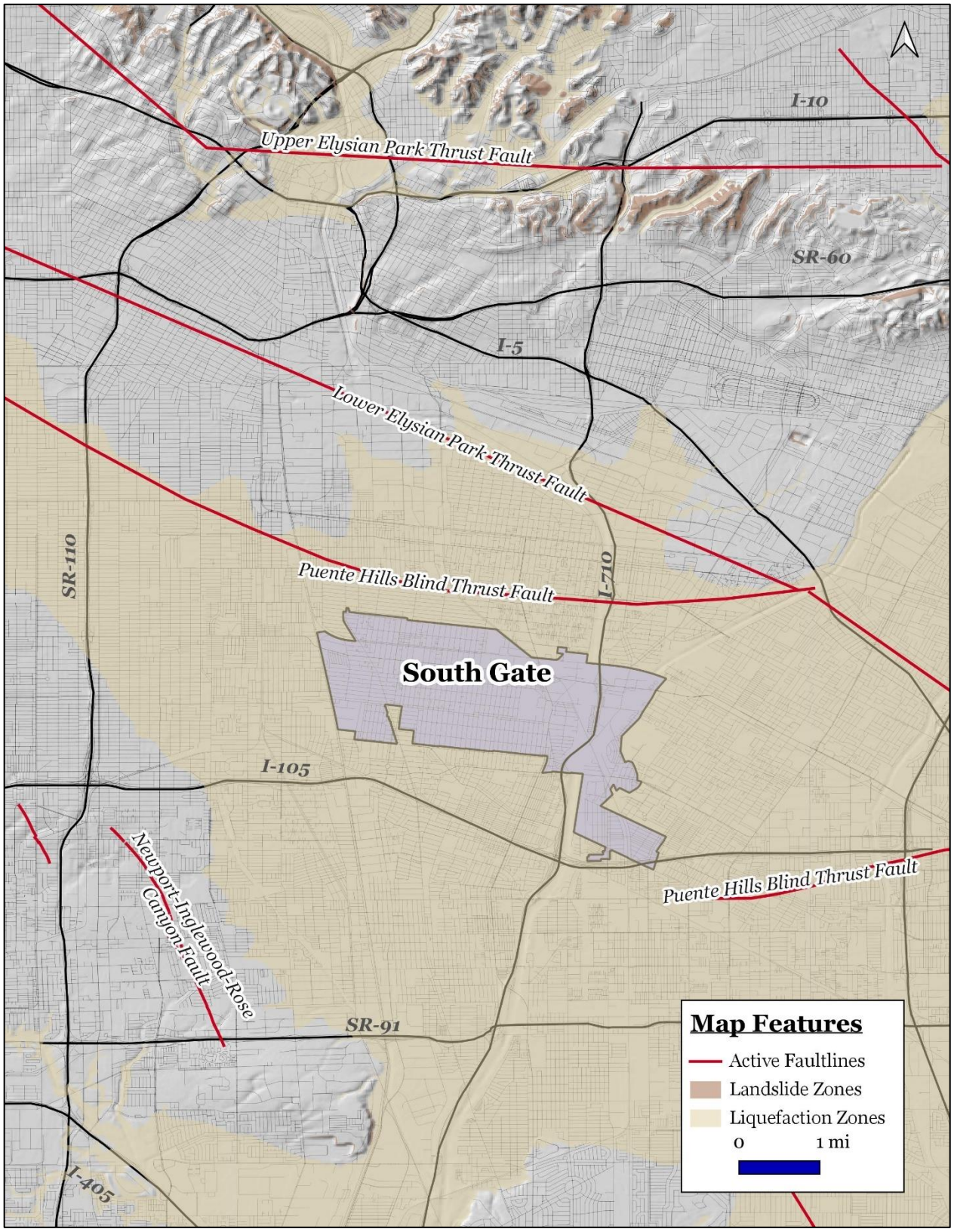

EXHIBIT 3-5
GEOLOGICAL CHARACTERISTICS
Source: CA Geological Survey

3.7.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to geology and soils if it would:

- Directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides; or,

- Result in substantial soil erosion or the loss of topsoil; or,

- 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; or,

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property; or,

- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

3.7.4 ENVIRONMENTAL IMPACTS

3.7.4.1 Impact Analysis: The project's potential impacts for directly or indirectly, causing potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.

As indicated previously, the project site is not located near an active fault trace. The City of South Gate is (and the project site) are not located near an Alquist-Priolo fault zone.[73] The Avalon-Compton Fault is the closest known fault to the project site. This fault is located approximately 4.65 miles to the southwest.[74] As a result, no fault rupture hazards will result from the proposed project's implementation. The geotechnical report prepared for the project indicated that the site is located in an area which is subject to strong ground motion due to earthquakes. However, numerous faults capable of producing significant ground motions are located as shown on Exhibit 3-5. Due to economic considerations, it is not generally considered reasonable to design a structure that is not susceptible to earthquake damage. Therefore, significant damage to structures may be unavoidable during large earthquakes. The proposed structure would, however, be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage and loss of life.[75]

[73] California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* https://www.conservation.ca.gov/cgs/Pages/Earthquakes/affected.aspx.

[74] Toll-Free Airline. *Los Angeles County Public and Private Airports, California.* http://www.tollfreeairline.com/california/losangeles.htm.

[75] *Southern California Geotechnical. Geotechnical Investigation [for the] Proposed Commercial/Industrial Development, 5037 Patata Street South Gate, California For Overton Moore Properties* January 29, 2021.

Conclusions: The proposed project would not be exposed to any fault rupture hazards since no active faults are located in the area. The risk from ground-shaking and liquefaction onsite is no greater than that for the surrounding area..

Mitigation Measures: No mitigation beyond the standard design and structural engineering design measures identified as a means to address potential seismic impacts, would be required.

Significance after Mitigation: Impacts would be less than significant.

3.7.4.2 Impact Analysis: The project's potential impacts for resulting in substantial soil erosion or the loss of topsoil.

Much of the project site is covered over with hardscape from the previous development. Beneath this surface layer is the alluvial and fill soils. Construction activities will remove the existing introduced ruderal vegetation and trees on-site potentially resulting in short-term erosion impacts due to increasing the rate of water runoff and concomitant susceptibility to erosion. Standard County Pollutant Discharge Elimination System Municipal Stormwater Permit requirements will decrease the degree of the proposed project's impacts. In addition, Best Management Practices such as temporary berms, installation of soil stabilizers, installation of bioswales, etc, for the project will minimize soil erosion and loss of topsoil resulting from Project development activities. As a result, the proposed project's impact would be less than significant.

Conclusions: The proposed project's impacts would be less than significant with adherence to the County Pollutant Discharge Elimination System Municipal Stormwater Permit requirements.

Mitigation Measures: No mitigation beyond the standard best available control (BACT) design measures to control erosion during construction would be required. These BACT measures may include, but may not be limited to, keeping water velocities low, minimizing amount of exposed area, scheduling earthwork during the dry season, and deign grading to fit the topography.

Significance after Mitigation: Impacts would be less than significant.

3.7.4.3 Impact Analysis: The project's potential impacts for being 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.

There are no landslides mapped on, or near, the project site. The Geotechnical Investigation states that due to the relatively level topography of the site, landslides are not present at the property or at a location that could impact the subject site. In addition, rock falls are not a design hazard or consideration due to the absence of natural bedrock slopes above and adjacent to the project site. Based on the results of review of the project, the field exploration, laboratory testing and geotechnical analysis, the proposed development is considered feasible from a geotechnical standpoint and would not result in any impacts related to lateral spreading, liquefaction, subsidence, collapse, or landslides.[76]

Conclusions: The proposed project's impacts on this issue would be less than significant.

[76] *Southern California Geotechnical. Geotechnical Investigation [for the] Proposed Commercial/Industrial Development, 5037 Patata Street South Gate, California For Overton Moore Properties* January 29, 2021.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: Impacts would be less than significant.

3.7.4.4 Impact Analysis: The project's potential impacts for being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property.

Southern California Geotechnical, Inc. performed a geotechnical investigation at the site. As part of this investigation, subsurface exploration was performed including eight borings (identified as B-9 through B-16) advanced to depths of 10 to 50± feet. Three borings were advanced to a depth of 50± feet as part of the liquefaction evaluation. In addition to the borings, three Cone Penetration Test (CPT) soundings (identified as CPT1 through CPT-3) were advanced to depths of 66 to 100± feet at the site as part of the liquefaction evaluation. Asphaltic concrete (AC) pavements were encountered at the ground surface at Boring No. B-9, and Boring Nos. B-12 through B-16. These pavements consist of 3 to 4± inches of asphaltic concrete underlain by 3 to 7± inches of aggregate base. Crushed aggregate base, 4± inches thick, was encountered at the ground surface at Boring No. B-10. Artificial fill soils were encountered beneath the pavements (or aggregate base) at Boring Nos. B-9, B-10, and B-12, extending to depths of 2.5 to 5.5± feet below the existing site grades. The artificial fill soils generally consist of loose to medium dense fine to coarse sand and silty fine sand with trace medium to coarse sand and fine to coarse gravel. The fill soils possess a disturbed and mottled appearance, with some samples possessing debris, such as fragments of asphaltic concrete, resulting in their classification as artificial fill. Fill soils were encountered to depths as great a 6.5 ± feet during the previous study SCG Job No. 17G144-1. Native alluvium was encountered at the ground surface or directly beneath the pavements at Boring Nos. B-11, B-13, and B-16, and beneath the artificial fill and/or possible fill soils at the remaining boring locations, extending to at least the maximum depth explored of 50± feet.[77]

In general, the soils at this site vary in composition and consist of interbedded layers of sands, silty sands, sandy silts, with occasional silty clay and clayey silt layers. The near surface native alluvial soils within the upper 8½ to 17± feet generally consist of interbedded layers of loose to medium dense fine sands and silty fine sands and fine sandy silts. At depths greater than 17± feet, the native alluvium generally consists of interbedded layers of loose to medium dense fine sand, silty fine sand and fine sandy silt with occasional medium stiff to very stiff silty clay and clayey silt lenses. These soils possess trace to little amounts of iron oxide staining and calcareous veining and nodules. Free water was not encountered during the drilling of any of the borings. However, water was observed in some of the borings after the completion of drilling and very moist samples were encountered at most of the borings, especially at depths greater than 13½± feet below the ground surface. In general, groundwater appears to be present at shallower depths in the eastern portion of the site, closer to the Los Angeles River. Groundwater was generally encountered at greater depths, if at all, in the western portion of the site (farther from the Los Angeles River). Based on the moisture contents of the recovered soil samples and the water measurement taken within the open borehole, the static groundwater table on the eastern half of the site is considered to have been present at depths of 16 to 18± feet below the existing site grades at the time of subsurface exploration. High moisture content often contributes to expansive soils. In the western portion of the site, the groundwater table is considered to have been present at depths of 43± feet and greater. Based on the results of the geotechnical study, field exploration, laboratory testing and geotechnical analysis, the underlying soils do not present a constraint to development (including expansive soils or liquefiable soils) and the proposed development is considered feasible from a geotechnical standpoint.[78]

[77] *Southern California Geotechnical. Geotechnical Investigation [for the] Proposed Commercial/Industrial Development, 5037 Patata Street South Gate, California For Overton Moore Properties* January 29, 2021.

[78] Ibid.

Conclusions: The proposed project's impacts would be less than significant with adherence to the recommendation outlined in the geotechnical study prepared for the proposed project by Southern California Geotechnical.

Mitigation Measures: No mitigation beyond the recommendations identified in the geotechnical studied prepared for the proposed project by Southern California Geotechnical that will be conditions of approval.

Significance after Mitigation: The impacts would be less than significant.

3.7.4.5 Impact Analysis: The project's potential impacts for having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The proposed project will be required to connect with the City's sanitary sewer system. No septic tank systems will be used.

Conclusions: The proposed project would not have any impacts on this issue since no septic tank systems would be used.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: The impacts would be less than significant.

3.8 GREENHOUSE GAS IMPACTS

This section describes the proposed project's impacts with respect to greenhouse gasses (GHG), discusses Federal and local regulations and policies pertinent to GHG, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address those impacts.

3.8.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential impacts for generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

- The project's potential impacts for conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 provides lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section of CEQA recommends certain factors be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts long as any threshold chosen is supported by substantial evidence (refer to CEQA Guidelines Section 15064.7(c)).The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (refer to CEQA Guidelines Section 15064(h)(3)).

3.8.2 ENVIRONMENTAL SETTING

3.8.2.1 Regulatory Setting

There are a number agencies involved in the development, implementation, and enforcement of regulations related to greenhouse gas emissions. The primary agencies include the United States Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and the Southern California Air Quality Management District (SCAQMD).

- *Environmental Protection Agency (EPA).* The EPA is the lead Federal Agency charged with the implementation and enforcement of the Clean Air Act. As part of this effort, the EPA is responsible for the

establishment of national ambient air quality standards, including those related to greenhouse gas emissions.[79]

- *California Natural Resources Agency*. The California Natural Resources Agency is presently developing the State's Climate Adaptation Strategy. Recently, the U.S. Supreme Court ruled that the effects associated with climate change are serious and the EPA must regulate GHG as pollutants including the development of regulations for GHG emissions from new motor vehicles. A number of states, including California, have set statewide GHG emission targets. The passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, established the California target to achieve reductions in GHG to 1990 GHG emission levels by the year 2020.[80] Senate Bill (SB) 32 was also signed into law on September 8, 2016, by Governor Edmund Gerald "Jerry" Brown Jr. SB-32 sets into law the mandated reduction target in GHG emissions as written into Executive Order B-30-15. The Senate bill requires that there be a reduction in GHG emissions to 40% below the 1990 levels by 2030.

- *California Air Resources Board (CARB)*. The CARB is part of the California Environmental Protection Agency (CALEPA) and is responsible for overseeing the implementation of the California Clean Air Act, meeting State requirements of the Federal Clean Air Act, and the establishment of the State ambient air quality standards. The CARB is responsible for the preparation setting emission standards for vehicles sold in California and for other emission-sources including consumer goods and off-road equipment. The CARB also established vehicle reformulated fuel specifications and the GHG reduction targets identified in SB 375.

- California Code of Regulations, Title 24, Part 11: California Green Building Standards Code (CALGreen). CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011. CALGreen is updated on a regular basis, with the most recent update consisting of the 2019 California Green Building Code Standards. Under State law, local jurisdictions are permitted to adopt more stringent requirements.

- *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, California Code of Regulations. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; to reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and to verify GHG emission reductions.

- *Tractor-Trailer GHG Regulation*. 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 heavy-duty 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

[79] Automobiles sold in California must meet the stricter emission standards established by the California Air Resources Board.

[80] California, State of. OPR Technical Advisory – CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review. June 19, 2008.

requirements for trailers to have low rolling resistance tires and aerodynamic devices. Finally, the CARB is developing the next phase of regulations to transition fuel-based on-road vehicles to Zero Emission technologies, such as battery-electric and hydrogen fuel-cell powered trucks. CARB's Advanced Clean Truck (ACT) regulation requires companies selling trucks in California to meet certain Zero Emission Vehicle (ZEV) or Near-Zero Emission Vehicle (NZEV) sales goals starting in 2024. In addition, larger business operations in California were required to provide a one-time report in 2021 on the trucks that they own or direct in California.

- *Phase 1 and 2 Heavy-Duty Vehicle GHG Standards.* CARB has adopted a new regulation for greenhouse gas (GHG) emissions from heavy-duty trucks and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the U.S. EPA rule for new trucks and engines nationally. Existing heavy-duty 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. CARB staff has worked jointly with the U. S. EPA and the National Highway Traffic Safety Administration (NHTSA) on the next phase of federal greenhouse gas (GHG) emission standards for medium- and heavy-duty 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 heavy-duty vehicles, including trailers.

- *City of South Gate General Plan.* The South Gate General Plan, as part of its Green City Element and the other Elements established objectives, policies, and implementation actions to reduce greenhouse gases by encouraging the use of alternative energy sources, reducing vehicle miles traveled, conserving parks/open space, developing public education programs emphasizing green building practices and promoting innovative approaches to reduce harmful impacts to the atmosphere. The precise effects of climate change on individual communities, such as South Gate, are uncertain. However, increasing fluctuations in temperature and unpredictability of weather patterns are among some of the consequences that are already being experienced in California. While impacts are uncertain, it is clear that South Gate can take steps to reduce its production of greenhouse gas emissions, which lead to climate change. Greenhouse gas emissions are strongly influenced by development patterns, which dictate how energy is used in transportation and buildings. In this context, local development patterns and practices are of both local and global importance and will be increasingly relevant and valuable in the long-term planning horizon of this General Plan. Key objectives and policies related to climate change are listed below:

    - *Objective GC 7.1:* Reduce South Gate's production of greenhouse emissions and contribution to climate change and adapt to the effects of climate change.

    - *Policy 1.* The City will pro-actively cooperate with the State to implement AB 32, which calls for reducing greenhouse gas emissions to 1990 levels by 2020, and Executive Order S-3-05, which calls for 1990 levels by 2020 and 80% below 1990 levels by 2050.

    - *Policy 2.* In cooperation with the State and SCAG, the City will proactively promote implementation of SB 375, in particular utilizing its incentives for transit-oriented development.

    - *Policy 3.* The City will strive to reduce its per capita greenhouse gas emissions to 15% below 2005 levels by 2020 (note: the 2005 levels are presented in the 2005 Greenhouse Gas Inventory, which is located in the Appendix of this General Plan).

- *Policy* 4 The City will reduce greenhouse gas emissions and adapt to climate change with efforts in the following areas:

- *Policy 1*. The City will create a Climate Action Plan to guide city efforts in reducing greenhouse gas emissions and adapting to climate change. Any major city decisions made before the Climate Action Plan is prepared should be consistent with the climate change goals and strategies in the Green City Element.

- *Policy* 2. To the extent feasible, the City should complete a greenhouse gas inventory and review the Climate Action Plan's mitigation strategies every 5 years to ensure they are still appropriate.

- *City of South Gate Resolution 7245*. On April 8, 2008, the City of South Gate passed Resolution 7245 expressing a commitment to conduct periodic greenhouse gas emissions inventories and enact policies and actions that will achieve emissions reductions. Concurrent with the most recent General Plan update, the City oversaw the preparationof a greenhouse gas inventory that provides an overview of the major causes of greenhouse gas emissions that result from activity in the City.

3.8.2.2 Physical Setting

GHG differ from criteria or toxic air pollutants in that the GHG emissions do not cause direct adverse human health effects. Rather, the direct environmental effect of GHG emissions is the increase in global temperatures, which in turn has numerous impacts on the environment and humans. Some examples of observed changes include shrinking glaciers, thawing permafrost, late freezing, early break-up of ice on rivers and lakes, a lengthened growing season, shifts in plant and animal ranges, and earlier flowering of trees. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The major GHG that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant while it remains in the atmosphere, it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. 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 retain 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 facilitating further warming of the atmosphere. 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. This will allow less energy to reach the Earth's surface thereby affecting surface temperatures.

- *Carbon Dioxide (CO2)*. The natural production and absorption of CO2 is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO2 include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities (the burning of fossil fuels) have increased the atmospheric concentrations of CO2. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) emissions of CO2 from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010.

- *Methane (CH4).* CH4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO2. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO2, N2O, and Chlorofluorocarbons (CFCs). CH4 has both natural and anthropogenic 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 human-related sources of methane production include fossil-fuel combustion and biomass burning.

- *Nitrous Oxide (N2O).* Concentrations of N2O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N2O 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. It is also commonly used as an aerosol spray propellant.

- *Chlorofluorocarbons (CFC).* CFCs are gases formed synthetically by replacing all hydrogen atoms in methane 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 have no natural source but were first synthesized in 1928. It was 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 in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

- *Hydrofluorocarbons (HFC).* HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF3), HFC-134a (CF3CH2F), and HFC-152a (CH3CHF2). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.

- *Perfluorocarbons (PFC).* PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF4) and hexafluoroethane (C2F6). Concentrations of CF4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

- *Sulfur Hexafluoride (SF6).* SF6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO2. Concentrations in the 1990s where about 4 ppt. 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.

On April 8, 2008, the City of South Gate passed Resolution 7245 expressing a commitment to conduct periodic greenhouse gas emissions inventories and enact policies and actions that will achieve emissions reductions. Concurrent with the most recent General Plan update, the City oversaw the preparation0f a greenhouse gas inventory that provides an overview of the major causes of greenhouse gas emissions that result from activity in the City.

The Greenhouse Gas Inventory was conducted separately for municipal sources (resulting from City operations) and community sources (resulting from transportation, building energy use, and waste produced by all South Gate residents). Total municipal emissions in South Gate (8,678 metric tons of carbon dioxide equivalent (MTCO2E) are only around 1.5% of the amount of total community emissions (575,206 metric tons MTCO2E.[81] Of community emissions, 51.5% came from residential and commercial building energy use, 41.4% came from transportation within city limits, and 7.1% came from waste produced by residents.

3.8.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to GHG if it would:

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

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

The City of South Gate has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the SCAQMD, OPR, CARB, CAPCOA, or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment. Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the proposed project using recommended air quality models, as described below.

The primary purpose of quantifying the project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good- faith effort to describe and calculate emissions. emissions. The City of South Gate has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. The SCAQMD's adopted numerical threshold of 10,000 MTCO2e per year for industrial stationary source emissions is typically selected as the significance criterion. For the proposed project, the threshold that will be used is 10,000 MTCO2e per year.

[81] Metric tons of carbon dioxide equivalent or MTCO2e is the unit of measurement in this tool. The unit "CO2e" represents an amount of a GHG whose atmospheric impact has been standardized to that of one unit mass of carbon dioxide (CO2), based on the global warming potential (GWP) of the gas.

3.8.4 ENVIRONMENTAL IMPACTS

3.7.4.1 Impact Analysis: The project's potential impacts for generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Project construction activities would generate emissions of CO2, CH4 and N20 and these construction-source emissions are quantified and amortized over the life of the proposed project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational GHG emissions. Accordingly, Project construction-source GHG emissions were amortized over a 30-year period and added to the annual operational-source GHG emissions of the project. The proposed project's operations would result in emissions of CO2, CH4, and N2O from the primary sources including the following: *area sources, energy sources, and mobile sources.* Area sources would include landscape and site maintenance equipment. Landscape and site maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers. Building energy consumption would result in CO2 and other GHG emissions. Natural gas or other fuels consumed at or within the project site would also be direct sources of project-related GHGs. GHGs are also emitted by off-site fuel consumption associated with the production of electricity and these emissions are considered to be indirect GHG emissions. Project traffic (also referred to as mobile sources) would also generate GHGs (CO2, CH4, and N2O). Trip characteristics available from the Traffic Impact Analysis (TIA) were utilized in estimating and modeling mobile source GHG emissions. Indirect GHG emissions would 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. The proposed project and uses will also result in the generation and disposal of solid waste. GHG emissions from landfills are associated with the anaerobic breakdown of solid waste disposed at the land fill.

The SCAQMD has adopted interim GHG thresholds for development projects within the South Coast Air Basin. According to the SCAQMD, the thresholds for industrial projects are 10,000 MTCO2E per year.[82] Table 3-8 summarizes annual greenhouse gas (CO2E) emissions from build-out of the proposed project. Carbon dioxide equivalent, or CO2E, is a term that is used for describing different greenhouse gases in a common and collective unit. As indicated in Table 3-8, the CO2E total GHG emissions for the project is 28,357 pounds per day or 12.66 MTCO2E per day. This translates into an annual emission of 4,621 MTCO2E, which is below the aforementioned threshold of 10,000 MTCO2E for industrial projects.

[82] SCAQMD. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Agenda No. 31.* December 5, 2008. https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf

Table 3-8
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (Lbs/Day)			
	CO_2	CH_4	N_2O	CO_2E
Construction Phase - Demolition	3,746.98	1.05	--	3,773.22
Construction Phase - Site Preparation	3,687.31	1.19	--	3,717.12
Construction Phase - Grading	6,011.48	1.94	--	6,060.1
Construction Phase - Construction	2,555.21	0.61	--	2,570.41
Construction Phase - Paving	2,206.74	0.71	--	2,224.59
Construction Phase - Coatings	281.45	0.01	--	281.83
Long-term Area Emissions	0.10	--	--	0.10
Long-term Energy Emissions	2,551.85	0.05	0.05	2,567.02
Long-term Mobile Emissions	25,458.22	1.47	0.99	25,790.36
Total Long-term Emissions	**28,010.18**	**1.52**	**1.04**	**28,357.48**

Source: CalEEMod V.2020.4.0.

This figure (5,170 MTCO2E) does not take into account the implementation of *low impact development* (LID) requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) and compliance to Transportation Demand Management (TDM) requirements. As indicated in the table, the great majority of the GHG emissions will be generated from mobile sources. For this reason, the project's use of trip reduction incentives (the use of alternative forms of transportation, the installation of electric vehicle charging stations (the project will provide 11 EV stations) and bicycle racks, and other TDM measures will be important). The project is also an infill development within an urban area. Therefore, the project's GHG impacts are less than significant.

Conclusions: The total GHG emissions for the project is 28,357 pounds per day or 12.66 MTCO2E per day. This translates into an annual emission of 4,621 MTCO2E, which is below the aforementioned threshold of 10,000 MTCO2E for industrial projects. The analysis determined that the proposed project's GHG impacts would be less than significant with adherence the low impact development (LID) requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) and compliance to Transportation Demand Management (TDM) requirements.

Mitigation Measures: No mitigation is required beyond the standard design measures.

Significance after Mitigation: Impacts would be less than significant.

3.8.4.2Impact Analysis: The project's potential impacts for conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

The proposed project will have a total floor area of 451,593 square feet of floor area. The main building's footprint would be 435,420 square feet and would consist of corporate offices, a warehouse, storage and cooler space, as well as mezzanine space. There would also be a 45,000-square-foot office located in the southwestern corner of the main building. The warehouse portion of the main building would consist of a loading and storage area, a total of 22,000

square feet of 36° cooler storage, and a total of 134,400 square feet of 60° cooler storage.[83] The second, smaller building would consist of 16,173-square-feet of floor area. This building would be truck maintenance workshop that would be located at the southeast corner of the project site.[84] The project would also provide 58 EV charging stations for automobiles, 96 EV charging stations for future zero carbon delivery vehicles; and 62 future EV charging stations for employee delivery vehicles. In addition, each dock high loading door, an electrical source/plug-in will be installed for EV trucks. Additionally, 69 stalls would be striped for Clean Air Vehicle vanpool/carpool/low-emitting fuel-efficient vehicles.

The parking areas would be concentrated on the west side of the project site, with the majority of parking provided near the office and the remainder provided around the perimeter along the north and east property lines. The dock positions and 163 delivery vehicles and trailer stalls would be located on the south side of the main building, providing separation from the residential properties located to the north of the site in the City of Cudahy. The truck court would be screened due to the project site's natural slope to the south.[85] The project's lighting would be designed to comply with LEED™, Cal Green, and California Title 24 requirements.[86]

During construction, the proposed project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Fossil fuels used to power construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment greater than 150 horsepower (hp), will be required to comply with all pertinent EPA and CARB Tier 3 emissions standards and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Additionally, construction building materials could include recycled materials and products originating from nearby sources in order to reduce costs of transportation. Furthermore, per the 2019 Title 24 Building Energy Efficiency Standards and 2019 CALGreen Code, the project would include the following that would further reduce transportation-related energy consumption:

- Bike lockers (2019 CalGreen Code Chapter 5, Section 5.106.4 Bicycle Parking)
- Charging stations for electric vehicles available for employees and guests (2019 CalGreen Code Chapter 5 Section 5.106.5 Designated parking for clean air vehicles)
- Electric vehicle parking spots (2019 CalGreen Code Chapter 5 Section 5.106.5 Designated parking for clean air vehicles)

The City of South Gate does not presently have an adopted Climate Action Plan. However, the City's General Plan includes a Green City Element that has a global climate change focus. In this section, the following policies related to air quality are identified:

[83]Ware Macomb. *Conceptual Design Plan [Design Package Prepared for Overton Moore Properties]* February 16, 2022.

[84]Ibid.

[86] Ibid.

- *Objective GC 7.1: Reduce South Gate's production of greenhouse emissions and contribution to climate change and adapt to the effects of climate change*. This is a new project that will implement state of the art design features that will reduce GHG emissions. The proposed project is a new building that will employ new LID design measures and employ numerous energy savings features.

- *Policy 1. The City will pro-actively cooperate with the State to implement AB 32, which calls for reducing greenhouse gas emissions to 1990 levels by 2020, and Executive Order S-3-05, which calls for 1990 levels by 2020 and 80% below 1990 levels by 2050*. The project will indirectly benefit the implementation of this policy. The proposed project may be used as a demonstration project to illustrate how new manufacturing development may employ alternative technologies to save energy and reduce GHG emissions.

- *Policy 3. The City will strive to reduce its per capita greenhouse gas emissions to 15% below 2005 levels by 2020 (note: the 2005 levels are presented in the 2005 Greenhouse Gas Inventory, which is located in the Appendix of this General Plan). P.4 The City will reduce greenhouse gas emissions and adapt to climate change with efforts*. The project will indirectly benefit the implementation of this policy. The proposed project may be used as a demonstration project to illustrate how new development may employ alternative technologies to save energy and reduce GHG emissions.

The proposed project will not involve or require any variance from the aforementioned policies. Furthermore, the proposed project will not involve or require any other variance from the adopted plan, policy, or regulation governing GHG emissions. There will also be a regional benefit in terms of a reduction in vehicle miles traveled (VMT) because it is an infill project that is consistent with the regional and State sustainable growth objectives identified in the State's Strategic Growth Council (SGC).[87] As a result, no impacts will occur.

The proposed project would not conflict with any of the following pertinent 2017 Scoping Plan developed by CARB.

- *Energy Efficiency*. The project will include a variety of building, water, and solid waste efficiencies consistent with the most current CALGreen requirements.

- *Million Solar Roofs Consistent*. The MSR program sets a goal for use of solar systems throughout the State as a whole. The project includes solar energy generation, with the building roof structure designed to support the solar panels consistent with Title 24 requirements.

- *Green Building Strategy*. The project will include a variety of building, water, and solid waste efficiencies consistent with the current CALGreen requirements

- *Recycling and Waste*. The project will be required recycle a minimum of 65 percent from construction activities and project operations per State requirements.

- *Sustainable Forests*. The project will increase carbon sequestration by increasing on-site trees per the project landscaping plan.

[87] Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council's member agencies. Focusing growth toward infill areas takes development pressure off conservation lands and working lands; it increases transit ridership and reduces vehicle trips; it requires less per capita energy and water use than less space-efficient development; it improves public health by promoting active transportation and active lifestyles; and it provides a more equitable mix of housing choices, among other benefits. Thus, the SGC has been investigating actions that can be taken to improve the ability of local governments and private developers to successfully plan and build good infill projects.

- *Water*. The project will include use of low-flow fixtures and efficient landscaping per State requirements.

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 percent below 1990 levels by 2030. Additionally, the project would be consistent with the GHG reduction-related actions and strategies outlined in the 2016-2045 RTP/SCS. The project applicant would not actively interfere with any future City-mandated, State-mandated, or Federally mandated retrofit obligations enacted or promulgated to legally require development City-wide, Statewide, or nation-wide to assist in meeting State-adopted GHG emissions reduction targets, including that established under Executive Order S-3-05, Executive Order B-30-15, or SB 32, as well as SB 375. The project does not directly interfere with the State's implementation of (i) Executive Order B-30-15 and SB 32's target of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing Statewide GHG emissions to 80 percent below 1990 levels by 2050.

Conclusions: The proposed project's GHG impacts would be less than significant with adherence the low impact development (LID) requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) and compliance to Transportation Demand Management (TDM) requirements.

Mitigation Measures: No additional mitigation beyond the standard design measures identified as a means to reduce GHG emissions would be required.

Significance after Mitigation: Impacts would be less than significant. .

3.9 HAZARDS & HAZARDOUS MATERIALS IMPACTS

This section describes the proposed project's impacts with respect to hazards and hazardous materials, discusses Federal and local regulations and policies pertinent to these issues, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts. A copy of the Phase I, Phase II Assessment, and Health Risk Assessment are provided in Appendix F.

3.9.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential impacts for creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

- The project's potential impacts for creating 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.

- The project's potential impacts for emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

- The project's potential impacts if the project 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 it create a significant hazard to the public or the environment.

- The project's potential impacts 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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.

- The project's potential impacts for impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- The project's potential impacts for exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.9.2 ENVIRONMENTAL SETTING

3.9.2.1 Regulatory Setting

There are a number of Federal and State agencies involved in the development, implementation, and enforcement of regulations related to hazards and hazardous materials. The primary agencies include the United States Environmental Protection Agency (EPA), the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC), the Southern California Air Quality Management District (SCAQMD), and the Los Angeles County Fire Department.

- *Environmental Protection Agency (EPA).* The EPA maintains a national inventory of all existing chemicals used in U.S. commerce. In 1976, there were more than 60,000 chemicals on the market that had never been comprehensively cataloged. The EPA developed and implemented procedures that have served as a model for Canada, Japan, and the European Union. For the inventory, the EPA also established a baseline for new chemicals that the agency should be notified about before being commercially manufactured. Today, this rule keeps the EPA updated on volumes, uses, and exposures of around 7,000 of the highest-volume chemicals used in industry.

- *Emergency Planning Community Right-to-Know Act*. The Emergency Planning Community Right-to-Know Act requires State or local planning for emergencies resulting from potential release of chemical materials. Any documented information pertaining to a specific release is required to be made public so that interested parties may become informed about potentially dangerous chemicals released in their community. Sections 301 through 312 of the Act are administered by the US Environmental Protection Agency's (EPA) Office of Emergency Management.

- *Hazardous Materials Transportation Act of 1975*. Under Title 49 of the Code of Federal Regulations, the US Department of Transportation is responsible for regulating the transport of hazardous materials. The California Department of Transportation (Caltrans) is responsible for enforcing Federal and State regulations pertaining to such activities and for responding to any related emergencies on California roadways. These agencies are also responsible for necessary permitting for the transport of hazardous materials.

- *Hazardous Materials Transportation Uniform Safety Act of 1990*. The Hazardous Materials Transportation Uniform Safety Act requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce, who also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. This 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.

- *Toxic Substances Control Act*. The Toxic Substances Control Act phased out the use of asbestos and ACMs in new building materials. The act identifies requirements for the use, handling, and disposal of ACMs. Additionally, Section 402(a)(1) of the act establishes disposal standards for LBP.

- *Resource Conservation and Recovery Act*. The Resource Conservation and Recovery Act (RCRA) generally communicates Federal laws pertaining to hazardous waste management. The RCRA requires any entity generating hazardous waste to identify and track such substances from the point of generation to recycling, reuse, or disposal. The DTSC implements the RCRA program in combination with other State hazardous waste laws, collectively known as the Hazardous Waste Control Law.

- *Asbestos Hazard Emergency Response Act* The Asbestos Hazard Emergency Response Act (AHERA) requires the EPA to establish and implement regulations that require local educational agencies to inspect their school buildings for ACMs, prepare asbestos management plans and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA is also tasked EPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

- *California Environmental Protection Agency*. The California Environmental Protection Agency (CalEPA) was created in 1991 by Governor's Executive Order. The six boards, departments, and office were placed under the CalEPA "umbrella" to create a cabinet-level voice for the protection of human health and the environment and to ensure the coordinated deployment of State resources. CalEPA and the State Water Resources Control Board establish rules

- *California Fire Code* The California Fire Code, which is updated every governing the use of hazardous materials and the management of hazardous waste. three years, is included in California Code of Regulations Title 24, Chapter 9 and was created by the California Building Standards Commission. Based on the International Fire Code, the California Fire Code serves as the primary means for authorizing and enforcing procedures and methods to ensure the safe handling and storage of hazardous substances that pose potential public health and safety hazards. The code regulates the use, handling, and storage requirements for hazardous materials at certain facilities. The California Fire Code and the California Building Code apply a classification system in identifying appropriate protective measures relative to fire protection and public safety.

- *Cortese Listing (Government Code Section 65962.5(a)*. As required by Government Code Section 65962.5, CalEPA develops an annual update to the Hazardous Waste and Substances Sites (Cortese) List, which is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. The DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the list. The EnviroStor database constitutes the DTSC's component of Cortese List data by identifying State response sites, The EnviroStor database identifies sites that have known contamination or sites for which further investigation is warranted. It also identifies facilities that are authorized to treat, store, dispose, or transfer hazardous waste.

- *Occupational Safety and Health Act (OSHA)*. OSHA provides for the education of handlers of hazardous materials, employee notification for those working with or in proximity to hazardous materials, acquisition of product safety data sheets and manufacturing data for proper use and handling of hazardous materials, and remediation training for employees for accidental release of hazardous materials. OSHA requires preparation of an "Injury and Illness Prevention Program",

which outlines measures to ensure employee safety such as inspections, how to address unsafe conditions, employee training, and communication protocols.

- *South Coast Air Quality Management District (SCAQMD)*. The SCAQMD works with the California Air Resources Board and is responsible for developing and implementing rules and regulations regarding air toxics on a local level. The SCAQMD establishes permitting requirements, inspects emission sources, and enforces measures through educational programs and/or fines. SCAQMD Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices with the goal of minimizing asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage and disposal requirements for asbestos-containing waste materials. SCAQMD Rule 166 sets the requirements to control the emission of volatile organic compounds (VOCs) from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

- *Los Angeles County Fire Department (LACFD)*. The LACFD Hazardous Materials Division regulates and enforces the provisions of the Uniform Fire Code relating to hazardous materials, including the use and storage of hazardous materials that are ignitable, reactive, corrosive, or toxic. Businesses using such materials are subject to permitting and inspection. The County currently requires any new business that intends to handle hazardous materials to inventory their hazardous materials and requires them to allow SBCFD to review their hazardous materials processes and procedures, prior to the execution of various required business permits. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the LACFD and the State Office of Emergency Services regarding any release or threatened release of a hazardous materials.

- *City of South Gate General Plan*. The South Gate General Plan, as part of its Safety Element and the other Elements established objectives, policies, and implementation actions to reduce the risks related to man-made hazards. Hazardous materials include a range of natural and artificial substances that can be a risk to the public, including toxic metals and chemicals, flammable or explosive materials, corrosive material, infectious substances, and radioactive materials. These materials can create health problems if inhaled, touched, or ingested. Alternatively, these materials can be relatively harmless by themselves but can create dangerous conditions such as explosives. Hazardous materials can also escape from containment vessels and contaminate groundwater, soil, or air, which may result in further impacts. Long-term public health and environmental issues can arise from the sustained use of or exposure to such materials.

3.9.2.2 Physical Setting

Existing Environmental Conditions

A site assessment (an Environmental Due Diligence Assessment) of the site commenced in 2007 and is continuing to the present. The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum

floor tiles. The facility employs approximately 140 full time equivalent staff. The Armstrong facility comprised of approximately 220,000 square feet under roof while manufacturing operations were conducted in a two-story building occupying approximately 120,000-square feet of floor space. The manufacturing and warehouse operations (approximately 54,000-square feet) were conducted within the same building, which is comprised of several building additions constructed over time. Additional structures on site consisted of an approximately 5,000-square foot office building and a small boiler house located to the north of the manufacturing building. All of these structural improvements have been demolished.

The project site was originally used for agricultural purposes from at least 1923 through 1928. In 1938, the Armstrong facility commenced operations at the site. Through the years, the manufacturing plant expanded in the western portion of the site. During this time, the eastern portion of the site continued to be vacant land. For a very short period of time, Armstrong originally used the site to manufacture cork wallboard and wine corks. Soon after construction, the plant was used to manufacture resilient flooring. Chemical use at the site have included asbestos, used as a filler in the vinyl floor tiles, chlorinated volatile organic compounds (VOCs), namely 1,1,1-trichloroethane (1,1,1- TCA) used in the former coating line (discontinued in approximately 1993); nonchlorinated VOCs, including methyl ethel ketone (MEK) used as a cleaning solvent; semi-VOCs (SVOCs), including diisononyl phthalate (DINP) and butyl benzyl phthalate (BBP) in liquid oils used as a plasticizer; polychlorinated biphenyls (PCBs) used in cooking oils in four pad-mounted transformers; and petroleum hydrocarbons used as fuels and lubricating oils. Previous investigations have shown no detectable to low concentrations of non-chlorinated VOCs, petroleum hydrocarbons, SVOCs, PCBs, and metals. Concentrations of chlorinated VOCs in soil gas and groundwater have been discovered at the site, along with asbestos containing soil and buried tile chips, and asbestos-containing building materials (ACBMs).

The project site is also located within a regional VOC groundwater plume, known as the "Northeast 710 (NE710) Study Area." The DTSC is actively pursuing potential responsible parties (PRPs) who may have impacted groundwater with VOCs due to historical land uses. Regional groundwater is reported to be impacted with trichloroethene (TCE), tetrachloroethylene (PCE), 1,1-dichlorothane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), 1,2-dichloroethane (1,2-DCA), cis-1,2- dichloroethene (cis-1,2-DCE), vinyl chloride, chromium, arsenic, and nickel. Due to the regional groundwater issue and reported use of VOCs at the site, Armstrong entered into a Corrective Action Consent Agreement (CACA) in January 2020 with the DTSC to investigate possible on-site sources and determine if Armstrong is a responsible party to this regional issue. During investigations completed at the site, five groundwater monitoring wells were installed and monitored. Groundwater has been measured at a depth of approximately 60 feet below the ground surface (bgs). On-site groundwater flow direction has been variable over the past year, although generally flows in a south to southwesterly direction.

Based on the results of the on-site groundwater investigations, concentrations of 1,1- DCA, 1,1-DCE, and vinyl chloride, and to a lesser extent TCE, 1,2-DCE, and cis-1,2- DCE, have been reported in on-site wells exceeding state drinking water standards (Maximum Contaminate Levels [MCLs]). The highest concentrations of VOCs, namely 1,1-DCE, 1,1-DCA, and vinyl chloride were detected in the groundwater wells in the vicinity of the Existing Clarifier and Sump located in the southwestern portion of the site and along the southern property line. Although concentrations of 1,1-DCE, 1,1-DCA, and vinyl chloride were also noted in soil gas in this area, the concentrations increased with depth, suggesting off-gassing groundwater as a source. Although there has been no evidence of an on-site release of these chemicals, the source of the

groundwater contamination in the southwestern portion of the site is unknown. Properties completing groundwater investigations in the immediate site vicinity have shown low concentrations of 1,1-DCE, 1,1-DCA, and vinyl chloride. Since a source of the groundwater contamination has not yet been identified, the DTSC will likely request additional groundwater and/or soil gas sampling to further evaluate these conditions. The regional VOC impacted groundwater and open case with the DTSC would be considered a recognized environmental condition (REC).

Three former underground storage tanks (USTs) and a former 3,600-gallon clarifier were historically used on-site. Two of the USTs (i.e., a 20,000-gallon diesel fuel UST and a 1,000-gallon UST), as well as the 3,600-gallon clarifier were removed from the site under the direction and oversight of the Los Angeles County Department of Public Works (LACDPW). Laboratory results of confirmation soil samples indicated no detectable to low concentrations of remaining chemicals. Based on these data, the LACDPW issued no further action (NFA) letters. The remaining 500-gallon soy bean oil UST was abandoned in-place under the direction of the LACDPW. Although no confirmation soil samples were collected, based on the type of materials being stored (i.e., soy bean oil), this UST would not be considered an environmental concern to the site. This UST will need to be removed and disposed of as construction debris during redevelopment. No further work is needed associated with the USTs and Former 3,600- Gallon Clarifier.

It should be noted that the 3,600-Gallon Clarifier was replaced at the same location with an aboveground Existing Clarifier and Sump. An underground clarifier is also currently located in the northwestern portion of the site and is was used to clarify discharged wastewater from an adjacent Chiller. Investigations have been completed in the vicinity of the underground clarifier and no elevated concentrations of contaminants have been discovered. This feature would not be considered an environmental concern to the site. As discussed below, concentrations of PCE and 1,1,1-TCA have been detected in soil gas in the vicinity of the Existing Clarifier and Sump. These constituents have not been detected in groundwater.

PCE and 1,1,1-TCA in soil gas has been detected in the vicinity of the existing clarifier and sump though the levels decrease with depth, suggesting an on-site source. Laboratory results of one soil sample collected during the removal of the former 3,600-gallon clarifier in 1996 indicated low concentrations of PCE (at the laboratory reporting limit of 0.005 milligrams per kilogram [mg/kg]) and 1,1,1-TCA at 0.050 mg/kg. The remaining three samples indicated no detectable concentrations of VOCs, including PCE and 1,1,1-TCA. Laboratory results of groundwater samples collected in this area have shown no detectable concentrations of PCE or 1,1,1-TCA. Based on this information, it appears that a very insignificant release of PCE and 1,1,1-TCA may have occurred in the vicinity of the existing clarifier and sump which has not threatened the groundwater.

Soil vapor concentrations throughout the site were further evaluated for possible human health risks through vapor intrusion by completing a human health risk assessment. When using the regulatory accepted 0.001 attenuation factor and 10E-5 cancer risk factor, soil gas concentrations in the 5-foot samples collected throughout the site, including the area of the Existing Clarifier and Sump, do not pose a cancer or noncancer risk to occupants of the property through possible vapor intrusion. Soil results indicate that there is not a risk to potential future commercial or industrial workers in direct contact with soil at the project site. There is a potential risk for future residents, should the site be developed as residential, due to one constituent (benzo(a)pyrene). The relatively low concentrations of constituents detected in the soil do not suggest a localized source exists on the site. Additional risk evaluations and/or engineering controls (e.g., a

cap that would prevent contact with soil) may be needed for any future residential redevelopment of the site.[88] However, since the site will not be developed as residential, this will not apply.

With respect to the residences that are located immediately north of the site, the results of soil gas sampling completed along the northern property line, residual VOCs, likely from off gassing regional groundwater, is present. Based on a human health risk assessment, these concentrations do not pose a human health risk to occupants by possible vapor intrusion using the regulatory accepted attenuation factor of 0.002 and 10E-6 cancer risk factor. However, concentrations of VOCs at 5 feet bgs along the northern property line exceed the human health risk criteria for possible vapor intrusion using the more conservative federal 0.03 attenuation factor and 10E-6 cancer risk factor. Based on this information, a human health risk to the off-site residences through possible vapor intrusion is unlikely. At least four investigations have been completed throughout the site with the collection and analyses of over 703 samples, including some samples collected during a concurrent investigation being completed at this time.

The majority of the asbestos buried on-site is in the form of a non-friable tile chip, however, friable asbestos in discrete soil cannot be completely ruled out. Based on the review of these data, there are four discrete areas on the site with non-friable asbestos containing tile chips and/or friable asbestos containing soil (designated as "Areas 1, 2, 3, and 4"). Areas 1, 2, and 4 are located within the western portion of the site and were the result of accidental spillage of tile chips at times when these areas were unpaved. Investigations in Areas 1, 2, and 4 have shown sporadic tile chips ranging in depth from surface to approximately 2 feet. Area 3 is located in the eastern portion which was used to historically dispose of tile chips. The tile chips were reportedly disposed of on this parcel and spread to the eastern portion of the lot. As would be expected, investigations have shown a continuous layer of tile chips at shallow depths in the eastern portion of the site, with sporadic chips in deeper depths. Based on investigations completed in this area of the site, tile chips have been identified in a small swatch of land along the eastern property line at depths of up to 3 feet bgs. Asbestos containing soil and tile chips would be considered an REC. It should be noted that surficial chips were also noted east of the site, between the eastern property line and the Los Angeles River. Remediation of these soils will also need to be completed with the approval of the adjacent property owner. Based on previous asbestos surveys, ACBMs have been identified at the site. Based on the date of construction of some of the remaining on-site buildings such as the guard shack, lead-based paint (LBP) may also be present.

3.9.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

- 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;

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or

[88] EPS. *Phase II Environmental Site Assessment Armstrong Flooring 5037 Patata Street South Gate, CA 90280*. May 20, 2019.

waste within one-quarter mile of an existing or proposed school;

- 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 it create a significant hazard to the public or the environment;

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

- Impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or,

- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.9.4 ENVIRONMENTAL IMPACTS

3.9.4.1 Impact Analysis: The project's potential impacts for creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The Department of Toxic Substances (DTSC) reviewed the Interim Measures Workplan (Workplan) that was submitted by Ardent Environmental Group, Inc. on behalf of the owner of the property. Hazardous substances documented as having been used and/or stored on the site include, but are not limited to volatile organic compounds (VOCs), such as 1,1,1- trichloroethane, trichloroethylene, and vinyl acetate; semi-volatile organic compounds; metals (primarily lead, mercury, and zinc), and asbestos. Based on site investigation activities conducted at the site, small quantities of broken tile are present on the western part of the Site where manufacturing took place. The eastern portion of the Site is unpaved, and waste floor tile was reportedly disposed in this area.

The Workplan was submitted on April 2, 2021 to present the proposed scope of work and estimated schedule to remediate subsurface asbestos-containing soil and tile chips by excavation and off-site disposal in preparation for future redevelopment of the Site. Based on DTSC's review of the Workplan, DTSC recommended that additional samples be collected in several areas prior to conducting the removal action. Armstrong and the State of California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) entered into a Corrective Action Consent Agreement (CACA) under which Armstrong agreed to investigate potential releases of hazardous materials at the site under the oversight of DTSC.

A Human Health Risk Assessment (HHRA) was performed to evaluate the potential risks to current and future commercial workers at the Site and to residents north of the Site due to the vapor intrusion pathway based on soil vapor samples collected at the Site (Appendix D). The HHRA was performed using results of soil vapor sampling conducted at the Site in 2020 and 2021. The HHRA evaluated potential exposures for current/future onsite commercial/industrial workers, current offsite residents, and hypothetical future onsite residents. The hypothetical future onsite resident scenario was used to be conservative, although the Site will remain commercial/industrial use for the foreseeable future. Potential human health risks were

evaluated by comparing the maximum concentrations detected at each sample location and at each sample depth. The results of this HHRA indicate that vapor intrusion cumulative cancer risks and noncancer hazards for current/future commercial/industrial workers exceed the target risk levels at several locations when using the conservative EPA default AF of 0.03. In contrast, only one location (SVP10) had a cumulative cancer risk exceeding the target risk of 1×10-5 commonly used for managing commercial/industrial sites in California based on the DTSC 2011 default AF 0.001. And although the cumulative risks at SVP-10 for the deeper samples (at 15, 30, and 45 ft bgs) were slightly above 1×10-5 , the cumulative risk for the shallow (5 ft bgs) samples at SVP-10 were below 1×10-5 . Additionally, the adjacent building is a large, poorly sealed, corrugated metal walled warehouse with windows, doors and vents that are open to the outdoors during operations. The planned installation of vapor intrusion mitigation measures (e.g., a vapor barrier) during future construction will result in even lower estimated risks. Therefore, it is unlikely that VOC concentrations in soil vapor at the Site would pose a health risk to current or future onsite workers.

For VOC concentrations detected in soil vapor samples collected from probes SVP-1 though SVP-4 located along the northern boundary of the Site, the cumulative risks for current offsite residents were within the acceptable risk management range of 10-6 to 10-4 using the DTSC default AF of 0.002. Only soil vapor samples collected from 15 and 30 ft bgs at SVP-1 along the northern property slightly exceeded 1×10-6 . Since the 5-ft samples are closer to receptors and vertical attenuation was not accounted for from the deeper intervals to the shallower depths, the greater weight of evidence should be placed on the 5 ft bgs samples, which were below the target cumulative risk of 1×10-6 . Therefore, it is highly unlikely that VOC concentrations in soil vapor at the site would pose a health risk to offsite residents.

Conclusions: The analysis indicated that the project's implementation would not result in any significant adverse impacts with the implementation of the following recommendations:

- The project Applicant must continue completing investigations and monitoring activities requested by DTSC.

- Prior to redevelopment, any remaining asbestos-containing soil and floor tile must be remediated by excavation and off-site disposal. This work will need to be completed under the direction of the DTSC and SCAQMD, and in accordance with any pertinent requirements. The excavation, loading, and transportation of the impacted soil is assumed to be completed over a 76-day period (16 weeks) at a rate of approximately 400 yd3 per day (approximately equivalent to 600 tons per day).[89]

- Prior to finalizing demolition, ACBMs must be removed by a State-licensed contractor. A comprehensive LBP survey should be completed to determine whether LBP is present. If present, LBP should be stabilized prior to demolition.

- Due to the historical industrial use, a Soil Management Plan (SMP) must be prepared and implemented during redevelopment activities to address potential soils contamination.

[89] Ardent Environmental Group, Inc. Characterization of Subsurface Asbestos Armstrong Flooring, Inc. 5037 Patata Street South Gate, California

- Although there is a low likelihood that VOCs in soil vapor will present a human health risk through vapor intrusion, Future buildings must be constructed with vapor control systems (e.g., vapor barrier) for precautionary measures.

- Groundwater monitoring wells and soil vapor probes may be removed with concurrence by DTSC. These need to be protected for future monitoring if DTSC closure has not been obtained before redevelopment.

Mitigation Measures: The following mitigation measure would be required to reduce the project's potential impacts related to potential hazardous materials impacts:

Hazards and Hazardous Materials Mitigation Measure No. 1. The project Applicant must continue completing investigations and monitoring activities requested by DTSC.

Hazards and Hazardous Materials Mitigation Measure No. 2. Prior to redevelopment, any remaining asbestos-containing soil and floor tile must be remediated by excavation and off-site disposal. This work will need to be completed under the direction of the DTSC and SCAQMD, and in accordance with any pertinent requirements.

Hazards and Hazardous Materials Mitigation Measure No. 3. Prior to finalizing demolition, ACBMs should be removed by a State-licensed contractor. A comprehensive LBP survey shall be completed of the remaining buildings (such as the guard shack) to determine whether LBP is present. If present, LBP should be stabilized prior to demolition.

Hazards and Hazardous Materials Mitigation Measure No. 4 Due to the historical industrial use, a Soil Management Plan (SMP) must be prepared and implemented during redevelopment activities to address potential soils contamination. The SMP will focus on the handling, storage, and transport of potentially contaminated soils during grading and excavation activities. The SMP will be reviewed and must be approved by the City of South Gate. The SMP must be approved by the City prior to commencement of any removal of contaminated soils. The SMP mitigation will end once the project's construction activities commence.

Hazards and Hazardous Materials Mitigation Measure No. 5. Although there is a low likelihood that VOCs in soil vapor will present a human health risk through vapor intrusion, Future buildings must be constructed with vapor control systems (e.g., vapor barrier) for precautionary measures.

Hazards and Hazardous Materials Mitigation Measure No. 6. Groundwater monitoring wells and soil vapor probes may be removed with concurrence by DTSC. These need to be protected for future monitoring if DTSC closure has not been obtained before redevelopment.

Significance after Mitigation: Less than significant with mitigation.

3.9.4.2 Impact Analysis: The proposed project's potential for creating 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.

The project's impact analysis is with respect to ongoing demolition and remediation are discussed Section 3.9.4.1. The project site's future development would result in the construction of a new manufacturing/distribution buildings (the proposed project is described herein in Section 2.3). The materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by City of Los Angeles County Fire Department and the City of South Gate during routine inspections during construction activities. This handling of hazardous materials would be a temporary activity coinciding with the short-term construction period.

Any handling of hazardous materials would be limited in both quantity and concentration. During operation of the development site, hazardous materials may be transported and used on-site. However, logistics uses associated with the project typically do not generate, store, or dispose of large quantities of hazardous materials that could be released into the environment. However, as the end use of the buildings is not known at this time, long-term operation of the project may involve the routine transport, use, or disposal of hazardous materials. Because of the nature of the project, hazardous materials used on the development site may vary but are likely to be limited to fertilizers, herbicides, pesticides, lubricants, solvents, cleaning agents, and similar materials used for routine maintenance activities. The types and quantities of hazardous substances utilized by the various types of potential future users at the project site would vary. and, as a result, the nature of potential hazardous materials that could be released into the environment would vary.

Conclusions: The impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: Less than significant impacts.

3.9.4.3 Impact Analysis: The project's potential impacts for emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The proposed project will be located within 0.25 mile of the existing Park Avenue Elementary School in the City of Cudahy. The campus buildings are located approximately 1,175 feet to the north of the project site. The potential environmental impacts are outlined above under Section 3.9.4.1.

Conclusions: The conclusions are outlined above under Section 3.9.4.1.

Mitigation Measures: The mitigation measures identified under Section 3.9.4.1 will be applicable. No additional mitigation measures are required.

Significance after Mitigation: Less than significant impacts with mitigation.

3.9.4.4 Impact Analysis: The project's potential impacts if the project is 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 it create a significant hazard to the public or the environment.

The project site is also located within a regional VOC groundwater plume, known as the "Northeast 710 (NE710) Study Area." The California Department of Toxic Substances Control (DTSC) is actively pursuing potential responsible parties (PRPs) who may have impacted groundwater with VOCs due to historical land uses.

The *Cortese List*, also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the California Department of Toxic Substances Control (DTSC) Brownfields and Environmental Restoration Program referred to as EnviroStor. A search was conducted through the DTSC Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.[90] Therefore, no impacts will occur.[91]

Conclusions: The conclusions are outlined above under Section 3.9.4.1.

Mitigation Measures: The mitigation measures outlined under Section 3.9.4.1 will be applicable.

Significance after Mitigation: Less than significant with mitigation.

3.9.4.5 Impact Analysis: The project's potential impacts 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 a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.

The project site is not located within 2.0 miles of an operational public airport. The Compton-Woodley Airport is located in the City of Compton approximately 4.7 miles to the southwest of the project site. The nearest major airport is located in Long Beach approximately 7.0 miles to the south. The Los Angeles International Airport (LAX) is located approximately 14.5 miles to the west.[92] As a result, the proposed project will not present a safety hazard related to aircraft or airport operations at a public use airport.

Conclusions: The proposed project would not result in any hazards with respect to airport operations.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[90] CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm.

[91] Environmental Protection Agency. Environstor://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&ocieerp

[92] United States Geological Survey. *South Gate 7 ½ Minute Quadrangle*. 1994

3.9.4.6 Impact Analysis: The project's potential impacts for impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan

At no time will the any arterial roadway be completely closed to traffic during the construction phases. The nearest emergency evacuation routes include Firestone Boulevard and Atlantic Avenue. These two roadways will not be completely closed during the project's construction. In the event partial lane closures are required during restriping activities, the City will require the preparation and implementation of a traffic control plan.

Conclusions: The proposed project would not result in any impacts on this issue.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.9.4.7 Impact Analysis: The proposed project's potential for exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The project area is urbanized and the properties surrounding the site are developed. There are no areas of native vegetation found within the project site or in the surrounding properties that could provide a fuel source for a wildfire following development. As a result, there are no impacts associated with potential wildfires from off-site locations.

Conclusions: The proposed project would not result in any impacts on this issue.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.10 HYDROLOGY & WATER QUALITY IMPACTS

This section describes the proposed project's impacts with respect to hydrology and water quality, discusses Federal, State, and local regulations and policies pertinent to these issues, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts. A copy of the preliminary hydrology study and drainage study are provided in Appendix G.

3.10.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential impacts for violating any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

- The project's potential impacts for substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

- The project's potential impacts for substantially altering 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or the project's potential impacts for redirecting flood flows.

- The project's potential impacts for resulting in flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation.

- The project's potential impacts for Would the project conflicting with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.10.2 ENVIRONMENTAL SETTING

3.10.2.1 Regulatory Setting

There are a number of Federal and State agencies involved in the development, implementation, and enforcement of regulations related to hydrology and water quality. The primary laws and regulations involved in hydrology and water quality issues are outlined below.

- *Clean Water Act*. The Clean Water Act is the principal Federal law that addresses water quality. The act's primary objectives are to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The implementation plan for these objectives includes the regulation of pollutant discharges to surface water, financial assistance for public wastewater treatment systems, technology development, and non-point source pollution prevention programs. The Clean Water Act also establishes that states adopt water quality standards to protect public health or welfare and to enhance the quality of water. The use and value of State waters for public water supplies, propagation of fish and wildlife, recreation, agriculture, industrial purposes, and navigation must also be considered by the states.

- *National Pollutant Elimination Discharge System (NPDES).* NCAS5000002 applies to Statewide construction activities including clearing, grading, or excavation that results in the disturbance of at least one acre of total land area, or activity which is part of a larger common plan of development of one acre or greater. In most cases, the NPDES permit program is administered by authorized states. In California, these programs are administered by the nine Regional Water Quality Control Boards (RWQCBs) that issue NPDES permits and enforce regulations in their respective regions. A requirement of the State General Construction Activity NPDES permit is the preparation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must identify and implement best management practices (BMPs) to reduce impacts to surface water from contaminated stormwater discharges during the construction of the proposed action. Required elements of an SWPPP include the following: site description addressing the elements and characteristics specific to the site; descriptions of BMPs for erosion and sediment controls; BMPs for waste handling and disposal; implementation of approved local plans; proposed post-construction control requirements; and non-stormwater management.

- *California Water Code*. The California Water Code is the principal State law regulating water quality in the State. Other State codes contain water quality provisions requiring compliance as they relate to specific activities. The California Water Code regulates water and its uses. Division 7 of the California Water Code, also known as the Porter-Cologne Water Quality Control Act, establishes a program to protect water quality and beneficial uses of the State water resources and includes both ground and surface waters. The SWRCB and the RWQCBs are the principal State agencies responsible for control of water quality. They establish waste discharge requirements, oversee water quality control and monitoring, enforce discharge permits, and set groundwater and surface water quality objectives. They also prevent the waste and unreasonable use of water and adjudicate water rights.

- *Porter-Cologne Water Quality Control Act*. California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act (Water Code Sections 13000, et seq.). The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product. Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that

a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

- *City of South Gate General Plan*. The South Gate General Plan, as part of its Public Facilities and Services Element, promotes managed water use. South Gate, like most communities in Southern California, has limited water resources. Homes and businesses have become accustomed to having access to inexpensive and plentiful water delivered to them from other parts of the state but increasing development and demand for water resources has diminished the water available per capita. In recent years, water use, storage, recycling and distribution have become major issues for California. The City of South Gate will need to continue to create innovative approaches to managing stormwater flows to meet existing and expected future stormwater regulations.

- *City of South Gate Municipal Code*. Title 6 – Health and Sanitation, Chapter 6.67 – Storm Drains of the City of South Gate Municipal Code regulates the discharge of stormwater within the City. According to the aforementioned chapter, the project Applicant shall submit an LID plan to the department of community development prior to the submittal of an application for the first planning or building approval for a new planning priority project development project. The LID plan shall include measures designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapo-transpiration, bio-retention and/or rainfall harvest and use. The project applicant will be required to prepare a LID plan which implements set LID standards and practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal NPDES permit on the plans and permit application submitted to the City.

3.10.2.2 Physical Setting

The project site is underlain by Holocene-age alluvial deposits consisting of silt, clay, and discontinuous lenses of sand. These sediments represent river system deposits derived from the ancestral Los Angeles and Rio Hondo Rivers. The Upper Pleistocene-age Lakewood Formation consists predominantly of fine-grained silt and clay while the lower portion of the Lakewood formation contains greater percentages of sand with some gravel lenses. The Lower Pleistocene-age San Pedro Formation extends from a depth of approximately 275 to 1,200 feet below ground surface (bgs) and consists of marine and continental gravel, sand, sandy silt, silt, and clay.[93] Water supply in the city is derived from local groundwater wells operated and maintained by the California Water Service Company and imported water from the Metropolitan Water District (MWD). The regional ground water flow direction is to the west (LA-DPW, *Coastal Plain Deep Aquifer Groundwater Contour Map for Fall of 1994).*

In the existing condition, the majority of the site is paved and was previously over as a manufacturing use. The former manufacturing building has been demolished and the site is now undeveloped land. There is a well-defined vegetated swale, which appears to drain the site. The swale accepts runoff from the project site and conveys south, then southeasterly towards the southeast corner of the site. The swale dead ends near the southeast corner. The runoff must pond up then it spills out into the landscape strip paralleling the

[93] United States Geological Survey. *South Gate 7 ½ Minute Quadrangle*. 1994.

Los Angeles River. This landscape strip has a headwall with a 24" storm drain which collects the runoff from the site, from the northern portion of the railroad right of way, and the landscape strip west of the Los Angeles River. The total 50-year peak flow rate from the site including the offsite runoff tributary to the 24" pipe downstream is approximately 21.5 cfs. (20.0 cfs. + 1.5 cfs.). which is less than the allowable discharge (27.1 cfs). Therefore, runoff from the site at proposed condition does not adversely affect the runoff discharge that drains to the existing 24" pipe downstream.

3.10.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to hazards and hazardous materials if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or the project's potential impacts for redirecting flood flows;
- Result in flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation; or,
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.10.4 ENVIRONMENTAL IMPACTS

3.10.4.1 Impact Analysis: The project's potential impacts for violating any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Title 6 – Health and Sanitation, Chapter 6.67 – Storm Drains of the City of South Gate Municipal Code regulates the discharge of stormwater within the City. According to the aforementioned chapter, the project Applicant shall submit an LID plan to the department of community development prior to the submittal of an application for the first planning or building approval for a new planning priority project development project. The LID plan shall include measures designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapo-transpiration, bio-retention and/or rainfall harvest and use. The project applicant will be required to prepare a LID plan which implements set LID standards and

practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal NPDES permit on the plans and permit application submitted to the City.

The site is proposed to be developed with a single warehouse type building. There will be a truck yard along the east and south sides of the building, vehicle parking will be along the west and north of the building. The runoff will be collected in a series of catch basins. The site is being developed with a single warehouse type building. There will be a truck yard along the east and south sides of the building, vehicle parking will be along the west and north of the building. The runoff will be collected in a series of catch basins. The storm drain will convey the runoff towards the southeast corner of the site. The 50-year storm event flow rate for the site is approximately 65 cfs. which is higher than the allowable condition (27.1 cfs.). Detention is required onsite to limit discharge from the site. An offsite runoff (Area 1C 1.85 acres) north of the site will drain easterly and traverses south to a proposed swale adjacent to the easterly property and conveyed to an 24" pipe southeast of the site and ultimately discharged to Los Angeles River. The 50-year peak flow rate at this location is approximately 1.5 cfs. undetained. Adherence to the construction BMPs identified in the Low Impact Development (LID) will reduce potential construction related impacts to levels that are less than significant. These BMPs may include but not be limited to the use of bioswales, bioretention areas, organic filters, and sandbags to control water velocity. The implementation of the proposed project will not result in a violation in water quality standards or discharge requirements because the project Applicant will be required to implement the construction and operational Best Management Practices (BMPs) identified in the mandatory LID plan. As a result, the potential impacts are considered to be less than significant.

Conclusions: The analysis determined that adherence to the construction BMPs identified in the Low Impact Development (LID), will reduce potential construction related impacts to levels that are less than significant. Furthermore, the implementation of the proposed project will not result in a violation in water quality standards or discharge requirements since the project Applicant will be required to implement the construction and operational BMPs identified in the mandatory LID plan. As a result, the potential impacts are considered to be less than significant.

Mitigation Measures: No additional mitigation is required beyond the adherence of Title 6 – Health and Sanitation, Chapter 6.67 – Storm Drains of the City of South Gate Municipal Code regulates the discharge of stormwater within the City. The project applicant will be required to prepare a LID plan which implements set LID standards and practices for stormwater pollution mitigation and provides documentation to demonstrate compliance with the municipal NPDES permit on the plans and permit application submitted to the City.

Significance after Mitigation: The impacts would be less than significant.

3.10.4.2 Impact Analysis: The project's potential impacts for substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

The project site is underlain by Holocene-age alluvial deposits consisting of silt, clay, and discontinuous lenses of sand. These sediments represent river system deposits derived from the ancestral Los Angeles and Rio Hondo Rivers. The Upper Pleistocene-age Lakewood Formation consists predominantly of fine-grained

silt and clay while the lower portion of the Lakewood formation contains greater percentages of sand with some gravel lenses. The Lower Pleistocene-age San Pedro Formation extends from a depth of approximately 275 to 1,200 feet below ground surface (bgs) and consists of marine and continental gravel, sand, sandy silt, silt, and clay.[94] Water supply in the city is derived from local groundwater wells operated and maintained by the California Water Service Company and imported water from the Metropolitan Water District (MWD). The regional ground water flow direction is to the west.[95]

Grading related activities are not anticipated to deplete groundwater supplies from any underlying aquifer or interfere with any groundwater recharge activities. Groundwater was encountered during the drilling at two of the boring locations. Water was encountered at 47± feet below existing site grades at one boring and at 37½± feet below existing site grades at a second boring. The boreholes were dry at the time of completion of drilling. Very moist samples were also encountered at all of the borings, especially at depths greater than 12± feet below the ground surface. Using information from previous reports, along with the groundwater readings taken during this subsurface exploration, groundwater appears to be present at shallower depths in the eastern portion of the site, closer to the Los Angeles River. Groundwater was generally encountered at greater depths, if at all, in the western portion of the site (farther from the Los Angeles River). Based on the moisture contents of the recovered soil samples and the water measurement taken within the open boreholes, the static groundwater table on the eastern half of the site is considered to have been present at depths of 37½± feet below the existing site grades at the time of this subsurface exploration. In the western portion of the site, the groundwater table is considered to have been present at depths of 47± feet and greater. In the central portion of the sites, the depth to groundwater is assumed to vary between these depths. For this reason, grading impacts are anticipated to be less than significant.

Conclusions: Grading related activities are not anticipated to deplete groundwater supplies from any underlying aquifer or interfere with any groundwater recharge activities. In addition, the proposed project will be connected to the City's water lines and is not anticipated to deplete groundwater supplies through the consumption of the water. The impacts would be less than significant on this issue.

Mitigation Measures: No mitigation was required.

Significance after Mitigation: The impacts would be less than significant.

3.10.4.3 Impact Analysis: The project's potential impacts for substantially altering 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; 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, impede or the project's potential impacts for redirecting flood flows.

[94] United States Geological Survey. South Gate 7 ½ Minute Quadrangle. 1994.

[95] LA-DPW, Coastal Plain Deep Aquifer Groundwater Contour Map for Fall of 1994.

The site is being developed with a single warehouse type building. There will be a truck yard along the east and south sides of the building, vehicle parking will be along the west and north of the building. There will be a truck yard along the east and south sides of the building, vehicle parking will be along the west and north of the building. The runoff will be collected in a series of catch basins. The storm drain will convey the runoff towards the southeast corner of the site. The 50-year storm event flow rate for the site is approximately 65 cfs. which is higher than the allowable condition (27.1 cfs.). Detention is required onsite to limit discharge from the site. An offsite runoff (Area 1C 1.85 acres) north of the site will drain easterly and traverses south to a proposed swale adjacent to the easterly property and conveyed to an 24" pipe southeast of the site and ultimately discharged to Los Angeles River. The 50-year peak flow rate at this location is approximately 1.5 cfs. undetained.

An offsite runoff (Area 1C 1.85 acres) north of the site will drain easterly and traverses south to a proposed swale adjacent to the easterly property and conveyed to an 24" pipe southeast of the site and ultimately discharged to Los Angeles River. The 50-year peak flow rate at this location is approximately 1.5 cfs. undetained. The discharge from the site will be limited to less than 27.1 cfs. The additional flow will be temporarily detained below ground in the south truck yard. This will require approximately 11,800 cf of storage. The runoff will then be allowed to drain into a small detention basin at the south east corner of the site. This detention basin will have a spillway into the landscape strip west of the river. The pipe into the detention basin will control the flow to the basin and limit it to 20 cfs, which is less than the allowable maximum flood flow (referred to as the maximum Q). From there the runoff will continue to the existing 24" storm drain, which will mimic the existing condition. All improvements will be within the project limits and not encroaching into Flood Control Right-of-Way. The total 50-year peak flow rate from the site including the offsite runoff tributary to the 24" pipe downstream is approximately 21.5 cfs. (20.0 cfs. + 1.5 cfs.). which is less than the allowable discharge (27.1 cfs). Therefore, runoff from the site at proposed condition does not adversely affect the runoff discharge that drains to the existing 24" pipe downstream.

Conclusions: The total 50-year peak flow rate from the site including the offsite runoff tributary to the 24" pipe downstream is approximately 21.5 cfs. (20.0 cfs. + 1.5 cfs.). which is less than the allowable discharge (27.1 cfs). Therefore, runoff from the site at proposed condition does not adversely affect the runoff discharge that drains to the existing 24" pipe downstream.

Mitigation Measures: No additional mitigation beyond the standard design measure (on-site detention) would be required.

Significance after Mitigation: Less than significant impact.

3.10.4.4 Impact Analysis: The project's potential impacts for resulting in flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation.

According to maps obtained at the Federal Emergency Management System Map Service Center, the project site is not located within a 100-year flood plain. The project site is located within Zone X.[96] This flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year

[96] Los Angeles County Department of Public Works. *Flood Zone Determination Website*. http://dpw.lacounty.gov/wmd/floodzone/

flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain.[97] There are no standing bodies of water that could contribute to a seiche. Finally, the project site is located outside of any designated tsunami risk zone; the site is located approximately 16 miles from the Pacific Ocean. As a result, no impacts related to flood flows are associated with the proposed project's implementation.

Conclusions: The proposed project is not located in a designated flood or inundation zone and, as a result, no impacts would result from the proposed project's implementation.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.10.4.5 Impact Analysis: The project's potential impacts for Would the project conflicting with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The proposed project would be subject to the current Clean Water Act (CWA) requirements and would apply for an NPDES permit, which would include BMPs to prevent water quality impacts during construction and operation, as well as prepare and implement a site-specific Water Quality Management Plan (WQMP), which would include recommendations for BMPs to redirect, infiltrate and/or capture stormwater runoff on-site, and address water quality concerns, and construct project-specific drainage features in accordance with the provisions of the City's Master Drainage Plan. Prior to issuance of any grading permit for the project that would result in soil disturbance of one or more acres of land, the contractors will be required to demonstrate that coverage has been obtained under California's General Permit for Storm Water Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board, and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing shall be provided to the Chief Building Official and the City Engineer. Therefore, the impacts related to hydrology and water quality would be less than significant.

Conclusions: The proposed project would be subject to the current CWA requirements and the contractors would be required to apply for an NPDES permit, which would include BMPs to prevent water quality impacts during construction and operation. In addition, the contractors would be required to prepare and implement a site-specific WQMP. As a result, the proposed project's impacts related to hydrology and water quality would be less than significant.

Mitigation Measures: No mitigation measures beyond adherence to the requisite standard conditions would be required.

Significance after Mitigation: The impacts would be less than significant.

[97] FEMA. *Flood Zones, Definition/Description*. http://www.fema.gov/floodplain-management/flood-zones

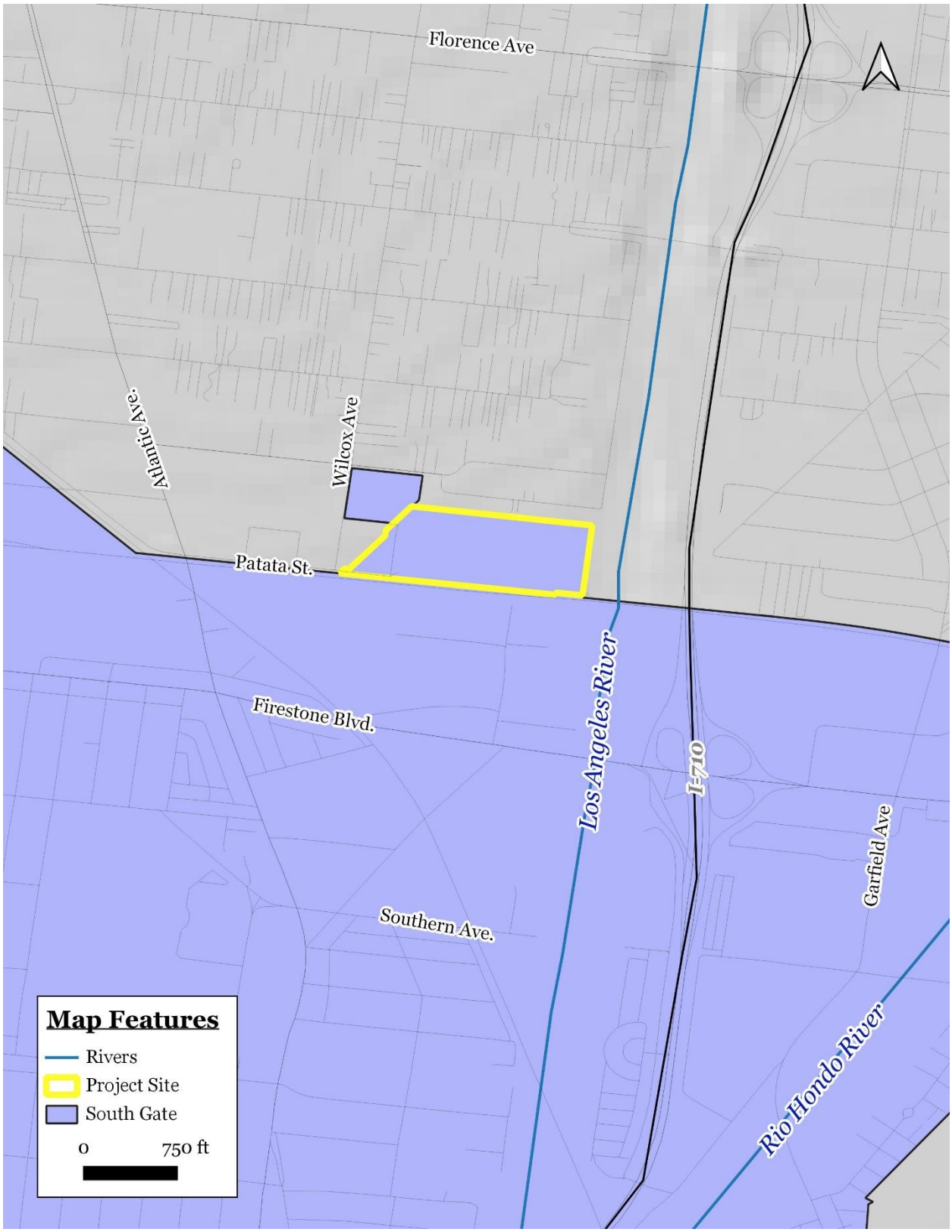

EXHIBIT 3-6
HYDROLOGY MAP
Source: NFHL

3.11 LAND USE & PLANNING IMPACTS

This section describes the proposed project's impacts with respect to land use and planning, discusses local land use requirements and policies pertinent to these issues, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts.

3.11.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for physically dividing an established community.

- The project's potential causing 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.

3.11.2 ENVIRONMENTAL SETTING

3.11.2.1 Regulatory Setting

There are a number of State, regional, and local agencies involved in the development, implementation, and enforcement of regulations related to land use and planning and these are outlined below.

- *California Planning and Zoning Law*. The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000–66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law provides cities and counties wide latitude in how a jurisdiction may create a general plan, There are certain requirements that must be met including the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

- *Southern California Association of Governments (SCAG)*. SCAG is the regional planning organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The region encompasses a population exceeding 19 million in an area of more than 38,000 square miles. As the designated Council of Governments (COG), the Federal government mandates SCAG to research and develop plans for transportation, growth management, hazardous waste management, and air quality. These mandates led SCAG to prepare comprehensive regional plans to address these concerns. SCAG is responsible for the maintenance of a continuous, comprehensive, and coordinated planning process resulting in a regional transportation plan. SCAG is also responsible for the development of demographic projections and the integrated land use, housing, employment, transportation programs, measures, and strategies for the Air Quality Management Plan (AQMP).

- *Regional Transportation Plan/Sustainable Communities Strategy*. The Connect SoCal plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS) represents the vision for Southern California's future, including policies, strategies, and projects for advancing the region's mobility, economy, and sustainability through 2040. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

- *City of South Gate General Plan*. The South Gate General Plan, as part of its Community Design Element, regulates land use and development in the City. The State of California law (Government Code Section 65302(a)) requires that a City's General Plan include a land use element which designates the proposed general location and extent of uses of the land for housing, business, industry and open space (including agriculture, natural resources, recreation), public facilities, solid waste disposal facilities and other categories of public and private uses of land. The land use element must include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan. The land use element has the broadest scope of the General Plan elements required by law. Since it regulates how land is to be used, many of the issues and policies contained in all other General Plan elements are impacted by and/or impact the land use element (Community Design Element).

- *City of South Gate Zoning Ordinance*. The purpose of the Zoning Ordinance is to protect and promote the public health, safety and general welfare of the South Gate community and to implement the policies of the General Plan. The key functions of the Zoning Ordinance are to provide specific development standards and guidelines to facilitate the continuing growth and development of the City. The zoning ordinance and zoning map will also direct development of existing corridors and districts to strengthen the economic base, provide services, and strengthen the identity of the community. Enable flexibility in development type and scale by location to provide for emerging economic and social trends. Finally, the zoning ordinance will ensure compatibility between different types of development and land uses.

3.11.2.2 Physical Setting

According to the City of South Gate General Plan, industrial development accounts for approximately 15.5 percent of the land in the City of South Gate. Industrial uses account for the third-largest land use after residential uses and transportation. The major concentration is north and east of the Firestone/Atlantic Intersection. The project site is located in the midst of this concentration. Another large concentration is located to the east of I-710 and the Los Angeles River. There are smaller concentrations of industrial uses in the northwest and southwest corners of the City. An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4. Photographs of the project site and the surrounding area are shown in Exhibits 2-5 through 2-10. Surrounding land uses in the vicinity of the project site are described below:

- *North of the Project Site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street.[98]

[98] Google Maps. Website accessed on February 22, 2022

- *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate.[99]

- *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site.[100] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site.[101]

- *West of the Project Site*. Wilcox Avenue generally extends along the project site's west side. Various commercial and industrial land uses are located to the west of the project site. Wilcox Avenue is located to the west of the site The Azalea Shopping Center is located along the west side of Atlantic Avenue. An Alta-Med medical office also occupies frontage along the west side of Atlantic Avenue.[102]

The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum floor tiles. The facility employed approximately 140 full time equivalent staff when the business was operational. The Armstrong facility comprised of approximately 220,000 square feet under roof while manufacturing operations were conducted in a two-story building occupying approximately 120,000-square feet of floor space. The manufacturing and warehouse operations (approximately 54,000-square feet) were conducted within the same building, which is comprised of several building additions constructed over time. Additional structures on site consisted of an approximately 5,000-square foot office building and a small boiler house located to the north of the manufacturing building. All of these structural improvements have been demolished.

The only remaining structural improvements located wthin the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site. Historic aerial photographs show that the project site contained structures on the western half of the project site dating back to 1954.[103] The project site has no street frontage and has a single point of ingress and egress that is located at the eastern terminus of Patata Street. The project site is currently zoned as Heavy Manufacturing (M-3)and is designated as Heavy Industrial in the General Plan. The M3 zone district permits a wide range of heavy industrial land uses and is intended to implement the manufacturing/distribution place type designation of the general plan. This zone includes uses such as industrial, manufacturing, large-scale warehouse, distribution, or logistics facilities. The heavy manufacturing M3 zone is intended to provide a setting for the most intensive industrial and manufacturing activities, providing an employment and export base for the community. Heavy industrial activities are intended to be the primary land use in this zone, and should be designed to protect the productivity of the industrial activities and minimize impacts on surrounding uses. Finally, the M3 zone is intended to implement, and is consistent with, the manufacturing/distribution place type designation of the South Gate General Plan.[104]

[99] Google Maps. Website accessed on February 22, 2022

[100] Ibid.

[101] Ibid.

[102] Ibid.

[103] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

[104] South Gate, City of. South Gate Municipal Code. Title 11 Zoning. Chapter11.24 Commercial and Industrial Zones.

3.11.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to land use and planning if it would:

- Physically dividing an established community; or,
- 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.

3.11.4 ENVIRONMENTAL IMPACTS

3.11.4.1 Impact Analysis: The project's potential for physically dividing an established community.

The proposed project would consist of 451,593 square feet. This floor area would include 435,420 square feet for the main building and a 16,173 square foot truck maintenance building. building.[105] The former Armstrong manufacturing facility consisted of approximately 394,000 square feet of floor area in the main buildings. These former improvements have been demolished and will be replaced by the proposed project. The proposed project will occupy the site that was formerly occupied by the former Armstrong plant. The proposed project will be confined to the current property and, as a result, the project would not divide an existing community.

Conclusions: The proposed project would be confined to the current property and, as a result, the project would not divide an existing community. As a result, no impacts would result from the proposed project's implementation.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.11.4.2 Impact Analysis: The project's potential causing 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.

As indicated in the previous section, the site's existing zoning is Heavy Manufacturing (M-3)and it is designated as Heavy Industrial in the General Plan. As part of the proposed project's implementation, the City will consider following discretionary approvals:

- The approval of a height variance to permit the building to exceed 50 feet in certain areas and would permit the new building's height to be extended to 60-feet, 6-inches in some areas, or an additional 10 feet, 6-inches above the 50 foot height limit. This additional height will not result in any significant aesthetic or land use compatibility impacts given the building's proposed setbacks.
- The approval of a parking count variance will be requested to allow for a reduction in the nu8mber of parking spaces (123 spaces). A total of 644 parking spaces are required while 521 parking spaces will be provided. This variance will only be applicable to the proposed use. Future uses and/or tenants may be required to prepared supplemental parking studies. No offsite or on-street parking will be permitted.
- The approval of a Conditional Use Permit;

[105] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

- The approval of a General Plan Amendment for modifications to the Mobility Element to extend the designated truck routes to the project site would not impact any other areas since the designation would only apply to Patata Street. This would ensure that trucks travelling to and from the site would remain on Patata Street.
- The approval General Plan Amendment to change the street designation for Patata Street in order to extend Patata Street at the proposed cul-de-sac on the southwestern corner of the project site would not impact any other areas since the designation would only apply to Patata Street. Patata Street would still terminate within the project site and no traffic would be diverted to off-site locations.
- The approval of a Development Agreement that would limit the City's consideration to a single user with outlined employment and economic benefits to the community.

The proposed project would involve the elimination of the existing blighted state of the site and its replacement with a new industrial development that would total 451,593 square-feet of floor area. The City of South Gate General Plan (Community Design Element) includes the following goals, objectives, and policies that are applicable to manufacturing uses:

- *Goal CD 8: An improved visual appearance throughout the City*. The proposed project's implementation is consistent with this goal. The existing blighted conditions would be eliminated and the site would be occupied with a modern development that conforms to the City's current development requirements.

- *Objective CD 8.1: Ensure high quality architecture and urban design throughout the City*. The proposed project's implementation is consistent with this objective. The existing blighted conditions would be eliminated and the site would be occupied with a The existing blighted conditions would be eliminated and the site would be occupied with a new building that consists of a modern state of the art design.

- *Policy.1 The City will encourage innovative and quality architecture in the City with all new public and private projects*. The proposed project's implementation is consistent with this policy. The existing blighted conditions would be eliminated and the site would be redeveloped with a new building that consists of a modern new building.

- *Policy 2 New buildings will be constructed to create attractive, pedestrian-friendly places*. The proposed project's implementation is consistent with this policy. Sidewalks and internal walkway would be provided throughout the new development. The existing Los Angeles River Trail connection will be maintained and improved.

- Policy 3 *High-quality and long-lasting building materials will be required on all new non-residential and multi-family Policy housing projects*. The proposed project's implementation is consistent with this policy. The existing blighted conditions would be eliminated and the site would be redeveloped with a new modern state-of-the art building.

- *Policy 4 New non-residential and multi-family buildings will be designed with attractive and inviting frontage on all public streets.* The existing blighted conditions would be eliminated and the site would be occupied with a modern development that conforms to the City's current development requirements.

- *Policy 1 Neighborhoods should be protected from incompatible non-residential uses and disruptive traffic and other Policy noise generating uses to the greatest extent feasible*. The proposed project's

implementation is consistent with this policy. The site plan calls for a generous separation between the proposed use and the adjacent homes located to the north in the City of Cudahy. All vehicular circulation will be directed to Patata Street and then to Atlantic Avenue. No traffic on local streets are envisioned.

- *Policy 2 The consideration and mitigation of noise, light, vehicular and other impact on residential properties will be considered when Manufacturing/Distribution or Light Industrial/Flex are proposed.* The proposed project's implementation is consistent with this policy. The City oversaw `the preparation of an EIR to evaluate the proposed project's environmental impacts and to identify any requisite mitigation. This EIR both identified the potential impacts and address the required mitigation.

- *Policy 3 Existing, non-conforming industrial uses should be phased out during the course of the General Plan. The proposed project's implementation is consistent with this policy.* The existing blighted and nonconforming conditions would be eliminated and the site would be occupied with a modern development that conforms to the City's current development requirements.

- *Policy 4 The City will not permit existing, non-conforming industrial uses to significantly expand their facilities except to rectify building code violations and maintain the appearance of the building.* The proposed project's implementation is consistent with this policy. The existing blighted conditions would nonconforming conditions would be eliminated.

- *Policy 5 Industrial uses should be regulated to minimize smoke, pollution, glare, excessive noise and other adverse impact on employees and on adjoining uses and areas.* The proposed project's implementation is consistent with this policy. The existing blighted conditions would be eliminated and the site would be occupied with a modern development that conforms to the City's current development requirements. The City oversaw the preparation of this EIR to evaluate the proposed project's environmental impacts and to identify any requisite mitigation. This EIR both identified the potential impacts and address the required mitigation.

- *Policy 6 Industrial uses should be adequately fenced and landscaped so as to minimize the potential impact on adjoining uses. The proposed project's implementation is consistent with this policy.* This policy is addressed in the Site Plan and Landscape Plan. Abundant plant materials are used as buffers along the site's north side adjacent to the homes.

- *Policy 7 Truck and employee traffic generated by industrial uses should be restricted to designated truck routes as specified in the Mobility Element of the General Plan.* The proposed project's implementation is consistent with this policy. All of the proposed project's trucks travelling to and from the project site will be required to use the designated truck routes.

- *Policy 8 Truck parking on public streets in non-industrial areas will be prohibited.* The proposed project's implementation is consistent with this policy. All of the proposed project's truck parking areas will be located on-site. No off-site or on-street parking of trucks will be permitted.

- *Policy 9* The *City will limit the development of industrial and other uses that use, store, produce or transport toxic substances, generate unacceptable levels of noise or air pollution, or produce other pollutants*. The City will require adequate mitigation measures, confirmed by environmental review and monitoring, for all such uses that are developed. The proposed project's implementation is consistent with this policy. The City

oversaw the preparation of this EIR to evaluate the proposed project's environmental impacts and to identify any requisite mitigation. This EIR both identified the potential impacts and address the required mitigation.

Conclusions: The analysis determined that the proposed project would not result in a significant environmental impact related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

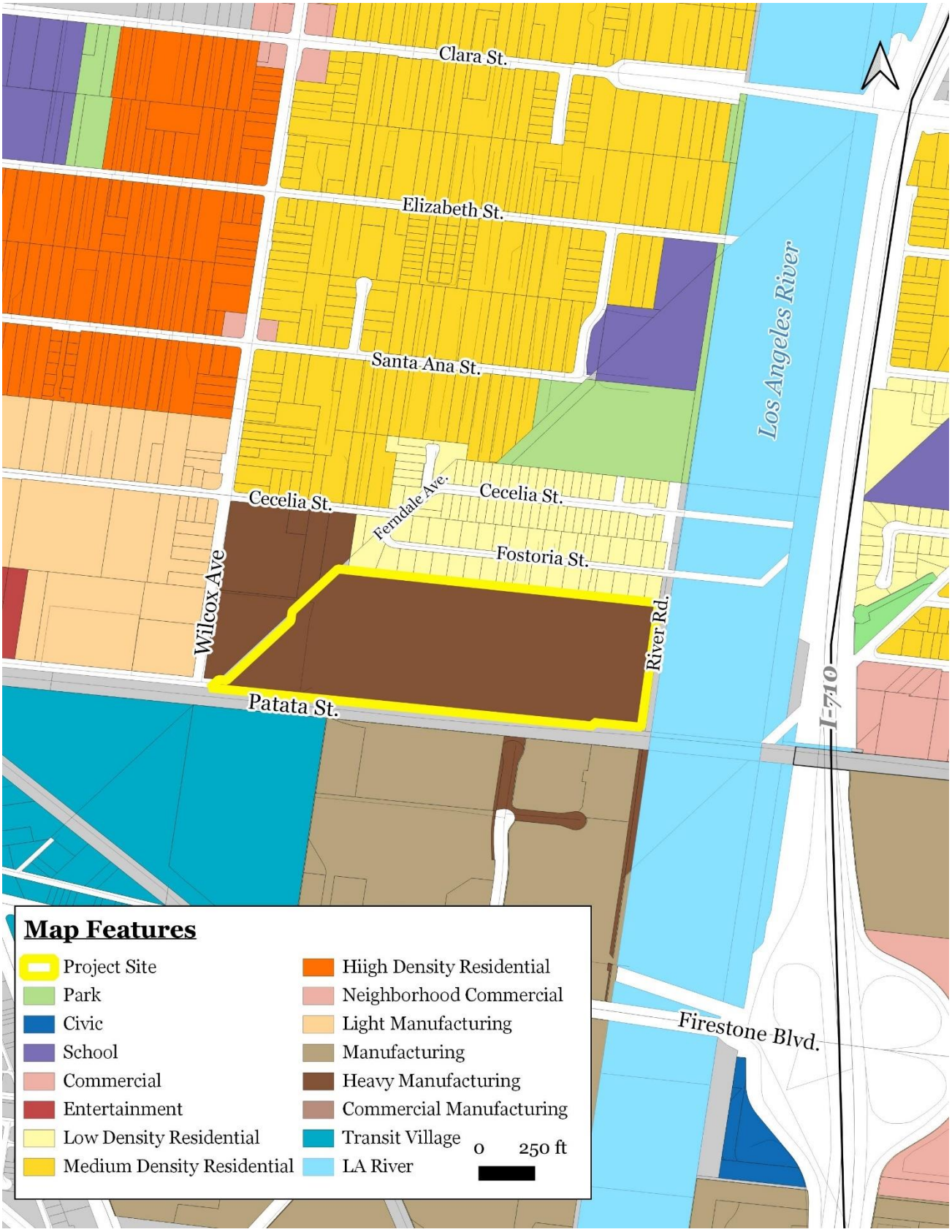

EXHIBIT 3-7
LAND USE MAP
Source: City of South Gate

3.12 MINERAL RESOURCES IMPACTS

This section describes the proposed project's impacts with respect to mineral resources, This section discusses scope of the analysis, pertinent regulations, the environmental setting with respect tom mineral resources, and thew environmental impacts.

3.12.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for resulting in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

- The project's potential for substantially resulting 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.

3.12.2 ENVIRONMENTAL SETTING

3.12.2.1 Regulatory Setting

There is a State agency and local plan involved in the development, implementation, and enforcement of regulations related to mineral resources. The primary agencies involved in mineral resources issues are outlined below.

- *Surface Mining and Reclamation Act*. The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

  - *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

  - *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.

  - *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.

- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities.

- *California Department of Conservation (CDOC).* The CDOC is responsible for conducting rulemakings to adopt and amend regulations covering a variety of issue areas. On March 20, 2019, the Office of Administrative Law approved the Idle Well Testing and Management Regulations. The CDOC also maintains the "CalGEM" well-finder mapping site.

- *City of South Gate General Plan.* The South Gate General Plan, as part of its Green City Element, promotes managed use and conservation of local resources. Additionally, the City can conserve and enhance global natural resources, including mineral resources, by purchasing environmentally preferable products and making informed consumer choices. In an increasingly globalized economy, and in the absence of major natural resources within the City, this is one of South Gate's best opportunities to have a positive effect on natural and biological resources.

3.12.2.2 Physical Setting

According to the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder, there are no existing or former oil wells and/or mineral extraction activities located within the project site (refer to Exhibit 3-8).[106]

3.12.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to mineral resources if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality; or,

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

3.12.4 ENVIRONMENTAL IMPACTS

3.12.4.1 Impact Analysis: The project's potential for project resulting in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. As a result, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

[106] California Department of Conservation. *Division of Oil, Gas & Geothermal Resources Well Finder*. http://maps.conservation.ca.gov/doggr/index.html#close. Website accessed January 18, 2022.

Conclusions: The project's implementation would not result in any impact related to mineral extraction activities. As a result, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.12.4.2 Impact Analysis: The project's potential for substantially resulting in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[36]

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.[107] As indicated previously, there are no active mineral extraction activities located on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

Conclusions: There are no active mineral extraction activities occurring on-site or in the adjacent properties and no impacts to mineral resources will occur.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[36] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*. *https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14*.

[107] California, State of. Department of Conservation. California *Oil, Gas, and Geothermal Resources Well Finder*. *https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.41448/34.56284/14*

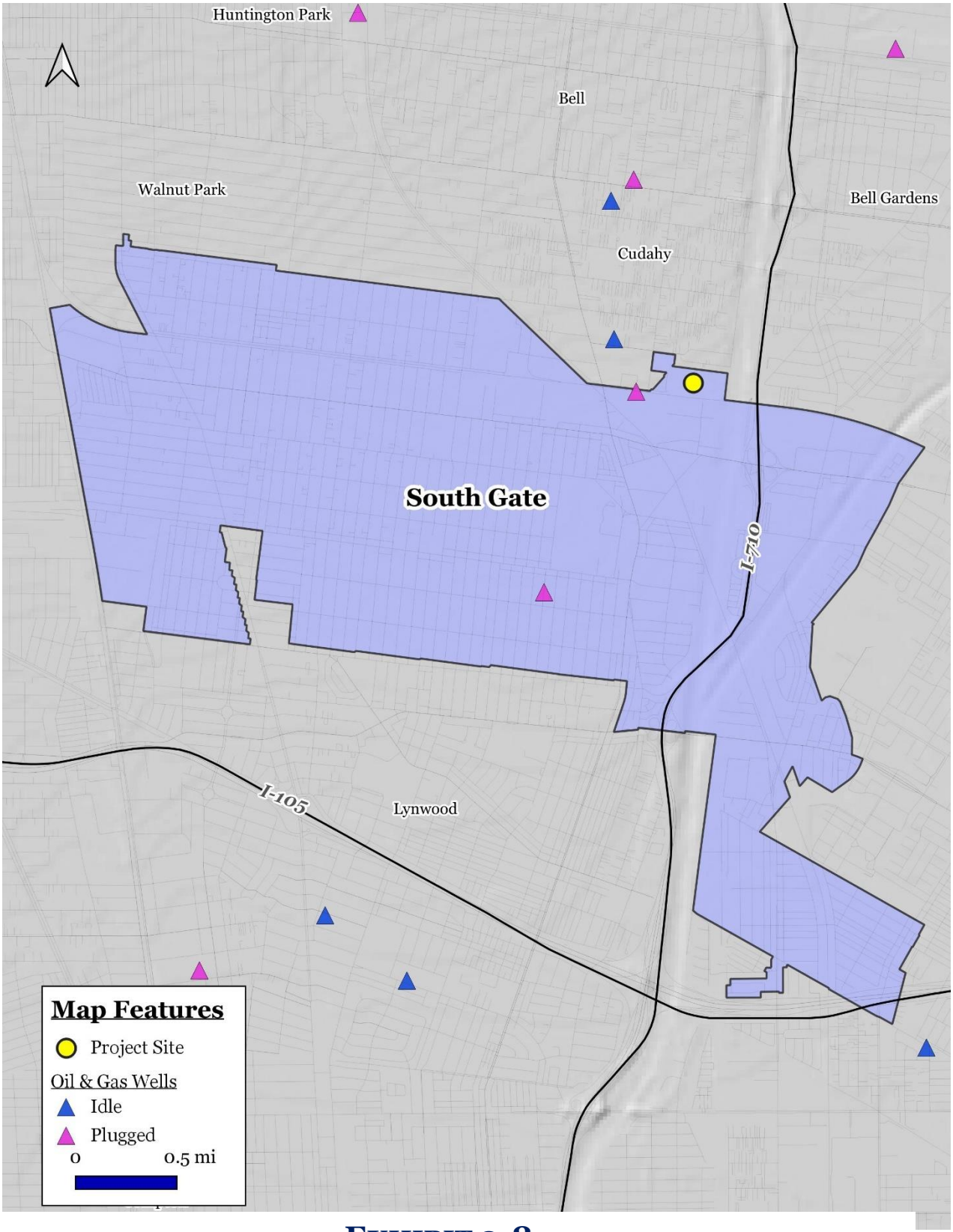

EXHIBIT 3-8
MINERAL RESOURCES MAP
Source: WellFinder

3.13 NOISE IMPACTS

This section describes the proposed project's impacts with respect to noise. This section discusses Federal, State, and local regulations and policies pertinent to these issues, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential noise and vibration impacts.

3.13.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for resulting in the generation of a substantial temporary or permanent increase in the 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 project's potential for resulting in the generation of excessive ground-borne vibration or ground-borne noise levels.

- 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, the project's potential for exposing people residing or working in the project area to excessive noise levels

3.13.2 ENVIRONMENTAL SETTING

3.13.2.1 Regulatory Setting

There are a number of Federal and State agencies involved in the development, implementation, and enforcement of regulations related to noise. The primary agencies and regulations involved in noise generation and/or noise exposure and these are outlined below.

- The *Federal Highway Administration (FHWA)*. The FHWA has established noise exposure standards for different land uses that apply to the planning and design of Federally funded highway projects.

- The *Federal Transportation Administration (FTA)*. The FTA has established ground borne vibration levels resulting from construction activities. Construction equipment vibration levels were published by the FTA. Using this vibration construction equipment data published by the FTA, it is possible to estimate a project's vibration impacts.

- The *Noise Control Act of 1972*. This Act authorized the Environmental Protection Agency (EPA) to publish descriptive data on the effects of noise and establish levels of sound requisite to protect public welfare with an adequate margin of safety.

- The *California Department of Transportation (CALTRANS) has established* policies and procedures for traffic noise studies in conformance with 23 CFR 772. The Protocol is required in order to obtain FHWA

approval for transportation projects authorized under title 23, United States Code. The 2011 Protocol, came into effect on July 13, 2011. The 2011 Protocol has since been superseded by the 2020 Protocol.

- The *California Motor Vehicle Code*. The California Motor Vehicle Code establishes noise standards for those areas not regulated by the Federal government. State standards regulate the noise levels of motor vehicles and motorboats; establish noise impact boundaries around airports; regulate freeway noise affecting classrooms, sound transmission control and occupational noise control; and identify noise insulation standards.

- *California Administrative Code, Title 24, Building Standards, Chapter 2.35*, Title 24 outlines noise insulation performance standards to protect persons within new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings.

- The *California Occupational Noise Control Standards*. These standards are contained in the California Code of Regulations, Title 8, Industrial Relations, Chapter 4, indicates permissible noise exposure at a workplace. According to these regulations, employees should not be exposed to noise levels of 90 dBA for more than eight hours in any workday.

- *The State of California Recommended Noise and Land Use Compatibility Guidelines*. The State of California Office of Planning and Research (OPR) Noise Element Guidelines include recommended interior and exterior level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The OPR Guidelines describe the compatibility of various land uses with a range of environmental noise levels in terms of dBA CNEL (Community Noise Equivalent Level). For example, a noise environment of 50 dBA CNEL to 60 dBA CNEL is considered to be "normally acceptable" for residential uses. The State indicates that locating residential units, parks, and institutions (such as churches, schools, libraries, and hospitals) in areas where exterior ambient noise levels exceed 65 dBA CNEL is undesirable. The OPR recommendations also note that, under certain conditions, more restrictive standards than the maximum levels cited may be appropriate. As an example, the standards for quiet suburban and rural communities may be reduced by 5 dBA to 10 dBA to reflect their lower existing outdoor noise levels in comparison with urban environments.

- The *City of South Gate Noise Control Ordinance*. The City of South Gate maintains a comprehensive Noise Ordinance within its Municipal Code that establishes citywide interior and exterior noise level standards. The City's Noise Ordinance (Municipal Code Chapter 11.29, Noise Emissions) establishes daytime and nighttime noise standards. For the project site, the maximum permissible noise level is 65 dBA for both the daytime and night time periods. The ordinance is designed to "control unnecessary, excessive and annoying sounds generated from a stationary source impacting an adjacent property." It differentiates between environmental and nuisance noise. Environmental noise is measured under a time average period while nuisance noise cannot exceed the established Noise Ordinance levels at any time.

- The *City of South Gate General Plan, Noise Element*. The State of California, in recognition of the relationship between noise and noise-sensitive uses and the public health concerns associated with noise, has adopted very specific guidelines for Noise Elements in both the Government Code (Section 65302[f]) and the Health and Safety Code (Section 46050.1). These guidelines include a requirement for defining projected future noise conditions in the form of noise exposure contours, which present information in a manner similar to topographic map contours. The South Gate General Plan includes a noise element that includes noise-related information to serves as the basis for developing guidelines for identifying compatible land uses as well as the proper distribution of land uses and establishing appropriate

development standards. The General Plan also includes goals, objectives, and policies that are designed to address noise in the City. Those policies that are relevant to the proposed project include the following:

P.1 Construction activities will be prohibited between the hours of 7:00 PM to 8: 00 AM Monday through Saturday and on Sundays and Federal holidays.

P.2 Construction noise reduction methods will be employed to the maximum extent feasible. These measures may include, but not limited to, shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied sensitive receptor areas, and use of electric air compressors and similar power tools, rather than diesel equipment.

P.3 Prior to approval of project plans and specifications by the City, project applicants and/or construction contractors will identify construction equipment and noise reducing measures, and the anticipated noise reduction.

P.1 The City Community Development Department and/or City Council will consider noise impacts of proposed developments.

P.6 The City will require noise mitigation as conditions of approval (COA) on major development projects, including a clear description of mitigation on subdivision maps, site plans, and building plans for inspection purposes.

P.7 The City will review development plans for the identification of sound attenuation measures, including but not limited to, double-glazed windows, sound insulation, sound walls, landscaping, use of low walls and landscaped slopes, enclose courtyards, rubberized asphalt, or relocation of driveways.

P.1 Truck deliveries to non-residential uses abutting residential or noise sensitive uses will be limited to the hours between 7:00 AM and 10:00 PM.

P.2 New non-residential projects adjacent to residential uses will be required to incorporate noise reducing features into the project design to minimize impacts to nearby residential uses and other noise sensitive land uses.

P.4 The City will prohibit the siting of loading and shipping facilities for commercial and industrial operations adjacent to existing or planned residential uses.

P.5 New buildings being developed adjacent to existing and/or planned residential uses or other noise-sensitive land uses will be required to site and operate heating, ventilating, and air conditioning generators in a manner that limits adverse noise impacts to the greatest extent feasible.

P.6 Wherever feasible, parking areas for new or redeveloped non-residential uses should be buffered and shielded by, but not limited to, walls, fences, and/or adequate landscaping.

P.2 Businesses in industrial areas will be required to manage heavy truck and vehicle access to minimize noise and vibration impacts on adjoining uses.

3.13.2.2 Physical Setting

Characteristics of Sound

Sound is mechanical energy transmitted by pressure waves through the air and is characterized by various parameters that include sound frequency, the speed of propagation, and the pressure level or energy content (amplitude). Noise is most often defined as unwanted sound. Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. At the other extreme, the eardrum may rupture at 140 dB. The noise levels associated with everyday activities are noted in Exhibit 3-10.

The human ear can detect changes in sound levels greater than 3.0 dBA under normal ambient conditions. Changes of less than 3.0 dB are noticeable to some people under quiet conditions while changes of less than 1.0 dB are only discernible by few people under controlled, extremely quiet conditions. Though in general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Noise levels may also be expressed as dBA where an "A" weighting has been incorporated into the measurement metric to account for increased human sensitivity to noise. The A-weightedmeasurements correlate well with the perceived nose levels at lower frequencies.

Noise may be generated from a point source, such as machinery, or from a line source, such as a roadway segment containing moving vehicles. Because the area of the sound wave increases as the sound gets furtherand further from the source, less energy strikes any given point over the surface area of the wave. This phenomenon is known as "spreading loss." Due to spreading loss, noise attenuates (decreases) with distance. Stationary, or point, noise subject to spreading loss experiences a 6.0 dBA reduction for every doubling of the distance beginning with the initial 50-foot distance. Noise emanating from travelling vehicles, also referred to as a line source, decreases by approximately 3.0 dBA 50 feet from a source over a hard, unobstructed surface such as asphalt, and by approximately 4.5 dBA over a soft surface, such as vegetation. For every doubling of distance thereafter, noise levels drop another 3.0 dBA over a hard surfaceand 4.5 dBA over a soft surface.

Time variation in noise exposure is typically expressed in terms of the average energy over time (called Leq), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50% of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level.Other values that are typically noted during a noise survey include the L_{min} and L_{max} that represent the minimum and maximum noise levels obtained over a given period, respectively.

Vibration Noise

Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernible in areas located near the construction site. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground borne vibration associated with the proposed project's construction would cause only intermittent, localized intrusion.

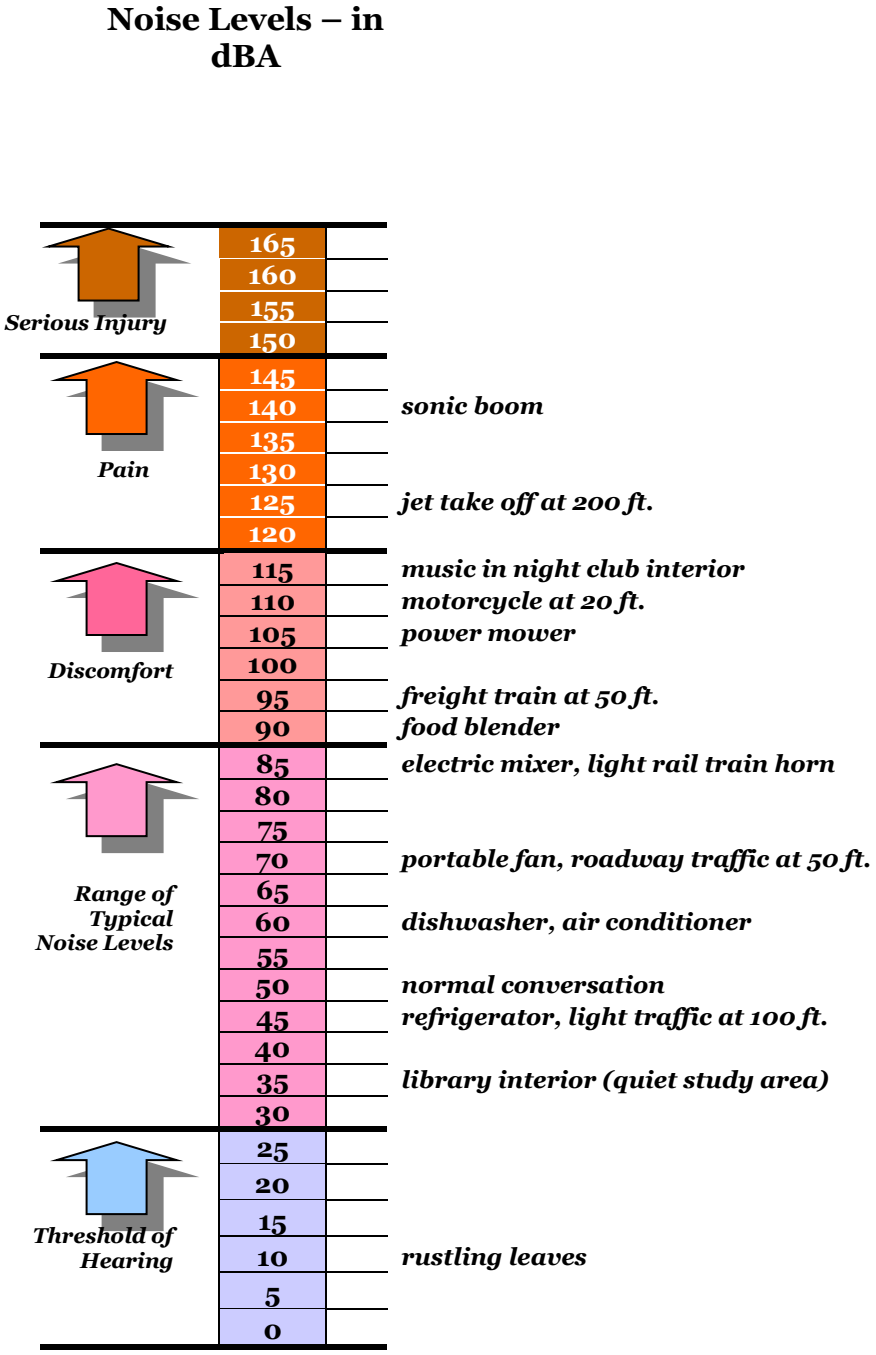

EXHIBIT 3-9
TYPICAL NOISE SOURCES AND LOUDNESS SCALE
Source: Blodgett Baylosis Environmental Planning

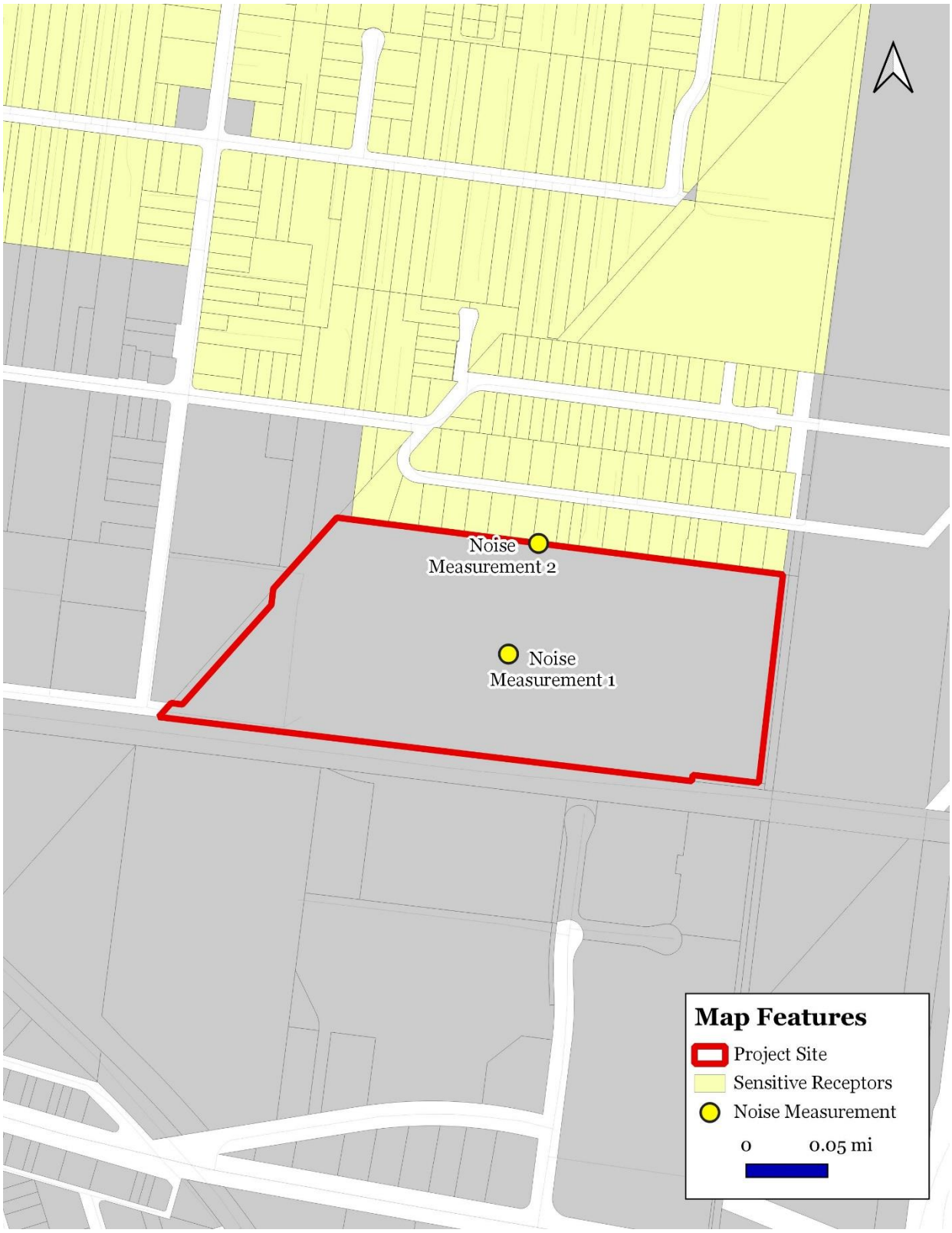

EXHIBIT 3-10
NOISE SENSITIVE RECEPTORS
Source: Blodgett Baylosis Environmental Planning

Construction activities most likely to cause vibration impacts include heavy mobile construction equipment has the potential of causing at least some perceptible vibration, the vibration is usually short-term and is not of sufficient magnitude to cause building damage. Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

The Existing Noise Environment

The project site is located in the midst of an urbanized area. The site was formerly developed in industrial uses. Surrounding uses in the vicinity of the project site are described below:

- *North of the Project Site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street. These home are located approximately 50 feet north of the proposed building's north elevation. These homes are considered to be noise sensitive.[108]

- *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate.[109]

- *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site.[110] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site.[111]

- *West of the Project Site*. Wilcox Avenue generally extends along the project site's west side. Various commercial and industrial land uses are located further west. The Azalea Shopping Center is located along the west side of Atlantic Avenue. An Alta-Med medical office also occupies frontage along the west side of Atlantic Avenue.[112]

To characterize the existing noise environment, a series of onsite noise measurements were taken during a weekday period (Monday, June 27) at two locations shown in Exhibit 3-10. The noise measurements were taken during the late afternoon (5:30 PM) and night-time (9:00 PM) periods. The late afternoon period represented the time when background commute traffic was the greatest while the night-time measurement period reflected a work periods for the nearby industrial uses. An *Extech Model 407730* Digital Sound Meter was used to conduct the noise measurements. A series of 100 discrete intervals were recorded at two separate locations (referred to herein as Location 1 and Location 2). Location 1 was located in the southern portion of the site and Location 2 was positioned within the central portion of the site. The measurements were captured five feet above the ground surface. The measurements taken at Locations 1 and 2 were collected free from any obstructions. Table 3-9 indicates the variation in noise levels over time during the measurement period. As indicated previously, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. The average noise levels during the measurement period were 66.5 dBA for Location 1 and 60.5 dBA for Location 2.

[108] Google Maps. Website accessed on February 22, 2022

[109] Ibid.

[110] Google Maps. Website accessed on February 22, 2022

[111] Ibid.

[112] Ibid.

The ambient noise environment was dominated by machinery noise from the nearby Shultz Steel facility and a business located to the northwest of the site. Traffic noise from Atlantic Avenue, the adjacent roadways, and overflying aircraft were secondary sources of noise. Backup alarms from equipment at Shultz Steel were a continuous source of noise during the daytime period. Compressor noise from the nearby truck yard was the dominant and continuous noise source at location 2.

Table 3-9
Noise Measurement Results

Noise Metric	Noise Level (dBA) for Location 1	Noise Level (dBA) for Location 2
L_{max} (Maximum Noise Level)	79.4 dBA	72.1 dBA
L_{99} (Noise levels <99% of time)	79.1 dBA	69.6 dBA
L_{90} (Noise levels <90% of time)	70.5 dBA	63.9 dBA
L_{75} (Noise levels <75% of time)	61.9 dBA	62.3 dBA
L_{50} (Noise levels <50% of time)	57.8 dBA	58.2 dBA
L_{min} (Minimum Noise Level)	53.3 dBA	48.3 dBA
Average Noise Level	58.9 dBA	58.7 dBA

Source: Blodgett Baylosis Environmental Planning.
Measurements were taken in February 22, 2022.

3.13.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to noise if it would:

- Result in the result in the generation of a substantial temporary (construction) or permanent increase in ambient noise levels (stationary noise) 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; or,
- Result in the generation of excessive ground-borne vibration or ground-borne (mobile) noise levels; or,
- 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, the project's potential for exposing people residing or working in the project area to excessive noise levels

3.13.4 ENVIRONMENTAL IMPACTS

3.13.4.1 Impact Analysis: The project's potential for resulting in the result in the 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.

Short-term Construction Noise

During the building construction phases, relatively high ground borne noise levels noise levels would be generated by the operation of heavy-duty trucks, backhoes, bulldozers, excavators, front-end loaders, scrapers, and other heavy duty construction equipment. Table 3-10, Maximum Noise Levels Generated by Construction

Equipment, indicates the anticipated noise levels from specific types of construction equipment. Point sources of noise emissions are attenuated by a factor of 6 dBA per a doubling of distance from the noise source. Construction is prohibited from taking place between the hours of 8:00 PM and 7:00 AM on weekdays, including Saturday, or at any time on Sunday or a Federal holiday.

Table 3-10 then indicates the anticipated construction noise levels for the selected construction equipment types at the sensitive receptors discussed previously. As indicated in the Table, As indicated previously, the construction noise thresholds were taken from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment. A significant construction noise threshold impact if construction noise exceeds 80 dBA at a sensitive receptor. These noise levels could intermittently occur for a few days when construction equipment is operating closest to the residential uses. The remainder of the time, the construction noise levels would be much less because the equipment would be working further away from the existing sensitive uses.

Table 3-10
Maximum Noise Levels Generated by Construction Equipment

Construction Equipment	Actual L_{max} @27 ft.	Actual L_{max} @50 ft.	Actual L_{max} @100 ft.	Receptor #1 L_{max} 84 ft.	Receptor #2 L_{max} 95 ft.
Backhoe	83 dBA	78 dBA	72 dBA	75 dBA	73 dBA
Bulldozer/Compactor	87 dBA	82 dBA	76 dBA	79 dBA	77 dBA
Concrete Mixer	84 dBA	79 dBA	73 dBA	77 dBA	74 dBA
Concrete Pump	86 dBA	79 dBA	73 dBA	77 dBA	74 dBA
Crane, Mobile	86 dBA	81 dBA	75 dBA	79 dBA	76 dBA
Dump Truck	81 dBA	76 dBA	70 dBA	73 dBA	71 dBA
Excavator	86 dBA	81 dBA	75 dBA	79 dBA	76 dBA
Grader	90 dBA	85 dBA	79 dBA	82 dBA	80 dBA
Loader	84 dBA	79 dBA	73 dBA	76 dBA	74 dBA
Paver	82 dBA	77 dBA	71 dBA	74 dBA	72 dBA
Roller	85 dBA	80 dBA	76 dBA	77 dBA	77 dBA
Tractor	89 dBA	84 dBA	78 dBA	81 dBA	79 dBA
Truck, Flatbed	79 dBA	74 dBA	68 dBA	71 dBA	69 dBA

Source: Bugliarello, et. al., *The Impact of Noise Pollution,* Chapter 127, 1976

The following mitigation measures focus on ways to reduce construction noise levels at the nearest sensitive receptors so that the impacts would be less than significant:

- Construction staging areas must be located within the southern portion of the project site, at least 500 feet south of the project site's northern boundary away from the noise sensitive receptors.

- The use of Tier IV rated construction equipment must be used during demolition, site preparation, and construction activities. Virtually all Tier 4 machines are quieter than their predecessors, especially the equipment that were referred to in Table 3-10. For example, one company's equipment (JCB), Tier 4 equipment realized reductions from 87 dBA to 72 dBA. The Tier 4 diesel construction equipment utilizes advanced technology that adjusts maximum engine output and that translated into both improved fuel economy, lower air emissions, and reduced noise and vibration. In general, the Tier 4 requirements took effect in 2015. This Tier 4 requirement will apply to all equipment shown in Table 3-9 that will potentially exceed 80 dBA near a sensitive receptor, namely graders and tractors. Overall, the use of this equipment will reduce the noise levels by 17% which will enable the 80 dBA

threshold be met.

- The Applicant must notify local residents regarding construction times and local contact information by placing a notice in the form of a sign alongthe project site's boundaries in prominent locations. The notice shall include the name and phone number of the contact person at both the construction site and at the City's Code Enforcement office where residents may call to register a complaint about noise. Upon receipt of a complaint, the contractors must stop work to inspect their equipment to ensure that they are properly tuned and muffled. Construction activities may not resume until the equipment is replaced and/or repair with newer and quieter Tier 4 equipment. In addition, copies of all complaints and subsequent communication between the affected residents and contractors must be forwarded to the City's Community Development Director.

Long Term Loading Dock Operations

The proposed project would involve the operation of a new warehouse and industrial development that would total 435,420 square-feet of floor area. The proposed development would include a new main building consisting of 435,420 square feet and a smaller truck maintenance building consisting of 16,173 square feet. The new tilt-up main building would consist of corporate offices, a warehouse, cooler space, as well as mezzanine space. The main building would also include a two-level office area consisting of 30,000-square-feet of floor area located in the southwestern corner of the main building. The warehouse portion of the main building would include a loading and storage area, a total of 30,000 square feet of 36° cooler storage, and 134,400 square feet of 60° cooler storage.

A reference noise level measurement for cold storage loading dock activities was collected to represent the truck idling/reefer activity at a neighboring receiving dock next to the offices of Blodgett Baylosis Environmental Planning. The truck idling activity reference noise level measurement was taken adjacent to the parking position with a direct line of site. During the measurement period, the recorded noise levels were 65.2 dBA at a uniform distance of 50 feet. This represents a worst case since the line of sight between the proposed project's loading docks and the homes will be obstructed by the new building. In addition, the distance between the receiving area and the homes will be at least 200 feet with no direct line of sight. The new building will be located between the new receiving areas (loading docks and truck maneuvering area) and the existing homes. As a result, the new building will attenuate the loading dock noise impacts on the existing homes. Finally, no trucks would be permitted to use the northerly drive aisle located between the building's north elevation and the project site's northern property line after normal business hours.

Truck Movement Noise and Entry Gate Operation

Another area of potential impact is related to truck traffic entering the facility after hours. Since the existing and proposed facility is not currently in operation, a reference measurement was taken at a distribution facility located adjacent to Gale Avenue in the City of Industry. The measurements occurred over a 15-minute period and represents multiple noise sources producing a reference noise level of 58.0 dBA at 50 feet. The noise sources included at this measurement location account for the rattling and squeaking during normal opening and closing operations, the gate closure equipment, truck engines idling outside the entry gate, truck movements through the entry gate, and background truck court activities and forklift backup alarm noise. Further, the entry gate and tuck movements operational interior noise volumes at the sensitive receptors would range from 30.5 dB during the daytime and up to 21.7 dBA during the nighttime, which would not exceed the City's 45 dBA daytime and nighttime interior noise standards. In addition, the distance between the entry area and the homes will be at least 200 feet with no direct line of sight. Thus, operational noise levels from the entry gate and on-site truck moments would be less than significant.

Air Conditioning Equipment Noise

To assess the noise levels from rooftop air conditioning units within the proposed use, reference noise levels measurements were taken for a single mechanical rooftop air conditioning unit. The reference noise level represents a Lennox SCA120 series 10-ton model packaged air conditioning unit which is one of the most common units currently in use. At 5 feet from the rooftop air conditioning unit, the exterior noise levels were measured at 77.2 dBA. At the uniform reference distance of 50 feet, the reference noise levels are 57.2 dBA. Based on the typical operating conditions observed over a four-day measurement period, the rooftop air conditioning units are estimated to operate for and average 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit (°F) with average daytime temperatures of 82°F. This equipment will not be visible to any of the sensitive receptors due to the 12-foot high parapet. Mitigation has been included herein (Mitigation Measure No. 5) calling for the roof top air conditioning equipment to be fully enclosed.

Parking Lot Noise

A majority of the exterior noise that will be generated from operation of the proposed project will originate from the open (unenclosed) parking areas. Noise generated within the open parking area would include people shouting/laughing, which averages 64.5 dBA; car door slamming, which averages 62.5 dBA; car idling, which averages 61 dBA;car starting, which averages 59.5 dBA; and people talking, which averages 41 dBA. All of these averages were taken at a distance of 50 feet from the source. This information is based on actual parking lot noise measurements taken by Blodgett Baylosis Environmental Planning. These noise levels are well below 65 dBA at the source. In addition, the parking areas will be separated for the homes located to the north of the project site by the proposed building which will further attenuate the project noise.
Conclusions: The analysis determined that during construction phases, mitigation would be required to reduce construction noise levels. The analysis determined that the proposed project's operational noise impacts would require mitigation to address roof top equipment and after hour truck movements along the north side of the building. As indicated previously, no trucks would be permitted to use the northerly drive aisle located between the building's north elevation and the project site's northern property line after normal business hours. These noise levels are well below 65 dBA at the source. As a result, the impacts will be less than significant.

Mitigation Measures: The following mitigation measures focus on ways to further reduce construction noise levels at the nearest sensitive receptors so that the impacts would be less than significant:

- *Noise Mitigation Measure No. 1.* Construction staging areas must be located within the southern portion of the project site, at least 500 feet south of the project site's northern boundary of the project site's northern boundary away from the noise sensitive receptors.

- *Noise Mitigation Measure No. 2.* The use of Tier IV rated construction equipment must be used during demolition, site preparation, and construction activities. Virtually all Tier 4 machines are quieter than their predecessors, especially the equipment that were referred to in Table 3-9. For example, one company's equipment (JCB), Tier 4 equipment realized reductions from 87 dBA to 72 dBA. The Tier 4 diesel construction equipment utilizes advanced technology that adjusts maximum engine output and that translated into both improved fuel economy, lower air emissions, and reduced noise and vibration. In general, the Tier 4 requirements took effect in 2015. Overall, the use of this equipment will reduce the noise levels by 17% which will enable the 80 dBA threshold be met.

- *Noise Mitigation Measure No. 3.* The Applicant must notify local residents regarding construction times and local contact information by placing a notice in the form of a sign alongthe project site's boundaries in prominent locations. The notice shall include the name and phone number of the contact person at both the construction site and at the City's Code Enforcement office where residents may call to register a complaint about noise. Upon receipt of a complaint, the contractors must stop work to inspect their equipment to ensure that they are properly tuned and muffled. Construction activities may not resume until the equipment is replaced and/or repair with newer and quieter Tier 4 equipment. In addition, copies of all complaints and subsequent communication between the affected residents and contractors must be forwarded to the City's Community Development Director.

  Noise Mitigation Measure No. 4. All building equipment located on the roof areas (air conditioning, compressors, and other stationary noise sources) shall be fully enclosed.

- *Noise Mitigation Measure No. 5.* Truck traffic will not be permitted to use the drive aisle located to the north of the new building between 7:00 PM and 7:00 AM.

Significance after Mitigation: No impacts would result.

3.13.4.2 Impact Analysis: The project's potential for substantially resulting Result in the generation of excessive ground-borne vibration or ground-borne noise levels.

Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernible in areas located near the construction site. Table 3-11 summarizes the levels of vibration and the usual effect on people and buildings. The U.S. Department of Transportation (U.S. DOT) has guidelines for vibration levels from construction related to their activities and recommends that the maximum peak-particle-velocity levels remain below 0.05 inches per second at the nearest structures. Vibration levels above 0.5 inches per second have the potential to cause architectural damage to normal dwellings. The U.S. DOT also states that vibration levels above 0.015 inches per second (in/sec) are sometimes perceptible to people, and the level at which vibration becomes an irritation to people is 0.64 inches per second.

Table 3-11
Common Effects of Construction Vibration

Peak Particle Velocity (in/sec)	Effects on Humans	Effects on Buildings
<0.005	Imperceptible	No effect on buildings
0.005 to 0.015	Barely perceptible	No effect on buildings
0.02 to 0.05	Level at which continuous vibrations begin to annoy occupants of nearby buildings	No effect on buildings
0.1 to 0.5	Vibrations considered unacceptable for persons exposed to continuous or long-term vibration.	Minimal potential for damage to weak or sensitive structures
0.5 to 1.0	Vibrations considered bothersome by most people, however tolerable if short-term in length	Threshold at which there is a risk of architectural damage to buildings with plastered ceilings and walls. Some risk to ancient monuments and ruins.
>3.0	Vibration is unpleasant	Potential for architectural damage and possible minor structural damage

Source: U.S. Department of Transportation

Typical levels from vibration generally do not have the potential for any structural damage. Some construction activities, such as pile driving and blasting, can produce vibration levels that may have the potential to damage some vibration sensitive structures if performed within 50 to 100 feet of the structure. The reason that normal construction vibration does not result in structural damage has to do with several issues, including the frequency vibration and magnitude of construction related vibration. Unlike earthquakes, which produce vibration at very low frequencies and have a high potential for structural damage, most construction vibration is in the mid- to upper-frequency range, and therefore has a lower potential for structural damage. Various types of construction equipment have been measured under a wide variety of construction activities with an average of source levels reported in terms of velocity levels as shown in Table 3-11.

Table 3-12
Vibration Source Levels for Construction Equipment

Construction Equipment		PPV @25 ft. (inches/sec)	Vibration Levels (VdB) @ 25 ft.
Pile Driver (impact)	Upper range	1.58	112
	Typical	0.644	104
Pile Drive (Sonic)	Upper range	0.734	105
	Typical	0.170	93
Clam Shovel Drop (Excavator)		0.202	94
Large Bulldozer		0.089	87
Caisson Drilling		0.089	87
Loaded Trucks		0.076	86
Small Bulldozer		0.035	79

Source: Noise and Vibration During Construction

Although the table gives one level for each piece of equipment, it should be noted that there is a considerable variation in reported ground vibration levels from construction activities. The data in Table 3-12 does provide a reasonable estimate for a wide range of soil conditions. Based on Transit Noise and Vibration Impact Assessment (FTA, May 2006), a vibration level of 102 VdB (velocity in decibels 0.5 inches per second [inches/sec]) or higher (FTA, May 2006) is considered safe and would not result in any construction vibration damage. No pile driving equipment will be used during the project's construction. As shown in Table 3-12, the use of excavators will produce the greatest vibration at 0.202 inches per second at a distance of 25 feet. The U.S. Department of Transportation (U.S. DOT) recommends that the maximum peak-particle-velocity levels remain below 0.05 inches per second at the nearest structures. Vibration levels above 0.5 inches per second have the potential to cause architectural damage to normal dwellings. As a result, the potential vibration impacts from construction equipment will be less than significant.

Conclusions: Although the table gives one level for each piece of equipment, it should be noted that there is a considerable variation in reported ground vibration levels from construction activities. The peak-particle-velocity levels would remain below 0.05 inches per second at the nearest structures. Vibration levels above 0.5 inches per second have the potential to cause architectural damage to normal dwellings. As a result, the potential vibration impacts from construction equipment will be less than significant.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.13.4.3 Impact Analysis: 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, the project's potential for exposing people residing or working in the project area to excessive noise levels

The project site is not located within two miles of an operational public airport. The Compton-Woodley Airport is located in the City of Compton approximately 4.7 miles to the southwest of the project site. The nearest major airport is located in Long Beach approximately seven miles to the south. The Los Angeles International Airport (LAX) is located approximately 14.5 miles to the west.[113] The project site is not located within a 65 dBA noi8se contour associated with the airport's operations.

Conclusions: The proposed project would not result in any noise exposure related to airport operations.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

[113] United States Geological Survey. *South Gate 7 ½ Minute Quadrangle*. 1994

3.14 POPULATION & HOUSING IMPACTS

This section describes the proposed project's impacts with respect to population and housing impacts. This section discusses scope of the environmental analysis, regulations and policies pertinent to population and housing, assesses the impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts.

3.14.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for inducing 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).

- The project's potential for displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.14.2 ENVIRONMENTAL SETTING

3.14.2.1 Regulatory Setting

There are a number of agencies involved in the development, implementation, and enforcement of regulations related to population and housing. The primary agencies and regulations involved in in this issue are outlined below.

- *California Planning and Zoning Law*. The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000–66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law provides cities and counties wide latitude in how a jurisdiction may create a general plan, There are certain requirements that must be met including the inclusion of seven mandatory elements described in the Government Code, including a section on land use and housing. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

- *Southern California Association of Governments (SCAG).* SCAG is the regional planning organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The region encompasses a population exceeding 19 million in an area of more than 38,000 square miles. As the designated Council of Governments (COG), the Federal government mandates SCAG to research and develop plans for transportation, growth management, hazardous waste management, and air quality. These mandates led SCAG to prepare comprehensive regional plans to address these concerns. SCAG is responsible for the maintenance of a continuous, comprehensive, and coordinated planning process resulting in a regional transportation plan. SCAG is also responsible for the development of demographic

projections and the integrated land use, housing, employment, transportation programs, measures, and strategies for the Air Quality Management Plan (AQMP).

- *Regional Transportation Plan/Sustainable Communities Strategy*. The Connect SoCal plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS) represents the vision for Southern California's future, including policies, strategies, and projects for advancing the region's mobility, economy, and sustainability through 2040. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

- *City of South Gate General Plan.* The South Gate General Plan, as part of its Community Design Element and Housing Element, regulates land use and residential development in the City. The State of California land use and housing law (Government Code Section 65302(a)) requires that a City's General Plan include a land use and housing element which designates the proposed general location and extent of uses of the land for housing, business, industry and open space (including agriculture, natural resources, recreation), public facilities, solid waste disposal facilities and other categories of public and private uses of land. The land use element must include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan.

- *City of South Gate Zoning Ordinance.* The purpose of the Zoning Ordinance is to protect and promote the public health, safety and general welfare of the South Gate community and to implement the policies of the General Plan. The key functions of the Zoning Ordinance are to provide specific development standards and guidelines to facilitate the continuing growth and development of the City. The zoning ordinance and zoning map will also direct development of existing corridors and districts to strengthen the economic base, provide services, and strengthen the identity of the community. Enable flexibility in development type and scale by location to provide for emerging economic and social trends. Finally, the zoning ordinance will ensure compatibility between different types of development and land uses.

3.14.2.2 Physical Setting

The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). Armstrong's operations involved the production of commercial and residential linoleum floor tiles. The Armstrong facility comprised of approximately 220,000 square feet under roof while manufacturing operations were conducted in a two-story building occupying approximately 120,000-square feet of floor space. When the facility was operational, it employed 140 full-time employees. The project site is currently zoned as Heavy Manufacturing (M-3)and is designated as Heavy Industrial in the General Plan. Surrounding land uses in the vicinity of the project site are described below:

- *North of the Project Site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street.[114]

[114] Google Maps. Website accessed on February 22, 2022

- *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate.[115]

- *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site.[116] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site.[117]

- *West of the Project Site*. Wilcox Avenue generally extends along the project site's west side.

There are no housing units located within the project site. No such uses are permitted under the site's current zoning.

3.14.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to population and housing if it would:

- 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).; or,

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.14.4 ENVIRONMENTAL IMPACTS

3.14.4.1 Impact Analysis: The project's potential for inducing 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).

The proposed project would consist of 451,593 square feet. This floor area would include 435,420 square feet for the main building and a 16,173 square foot truck maintenance building.[118] No housing units are located within the project site. The former Armstrong manufacturing facility consisted of approximately 394,000 square feet of floor area in the main buildings. These former improvements have been demolished and would be replaced by the proposed project. The proposed project will occupy the site that was formerly occupied by the former Armstrong plant. The proposed improvements will be confined to the current property. Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area and include the following:

- *New development in an area presently undeveloped and economic factors which may influence development*. The parcels surrounding the project site have been previously developed.

[115] Google Maps. Website accessed on February 22, 2022

[116] Ibid.

[117] Ibid.

[118] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

- *Extension of roadways and other transportation facilities.* The future Patata Street extension will serve the proposed project site only.
- *Extension of infrastructure and other improvements*. The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants. The project's potential utility impacts are further analyzed in Section 3.19.
- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will The proposed project would employ between 250 to 300 employees. The projected employment which can be accommodated by the local labor market given the County's current unemployment rate of 7.1%.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase. Again, this projected short-term employment which can be accommodated by the local labor market given the County's current unemployment rate.

The Armstrong facility employed 140 full-time employees when it was operational. As indicated previously, the proposed project is anticipated to employ between 250 and 300 persons once it is operational. It is also important to note that the City's current unemployment rate as of July 2022 is 5.3% which means that 2,200 persons are actively seeking work. As a result, there are more than adequate numbers of local members of the lo0cal workforce available to meet the anticipated employment demand for the proposed project. Based on the above analysis, the proposed project would not result in any growth inducing impacts. As a result, no impacts would occur.

Conclusions: The proposed project's implementation would not result in any growth-inducing impacts. As a result, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

3.14.4.2 Impact Analysis: The project's potential for displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

There are no housing units located within the project site. No such uses are permitted under the site's current zoning. As a result, no displacement impacts would result from the proposed project's implementation.

Conclusions: There are no housing units on-site and, as a result, no displacement impacts would result.

Mitigation Measures: No mitigation measures are required.

Significance after Mitigation: No impacts would result.

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3.15 PUBLIC SERVICES IMPACTS

This section describes the proposed project's impacts with respect to public services. This section also discusses the regulatory and environmental setting for this issue, evaluates the environmental impacts, and provides, where appropriate, mitigation measures to address and potentially significant impacts that have been identified.

3.15.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for resulting 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 would cause significant environmental impacts, in fire protection; police protection; schools; parks; or other public facilities.

3.15.2 ENVIRONMENTAL SETTING

3.15.2.1 Regulatory Setting

There are a number of local agencies involved in the development, implementation, and enforcement of regulations related to public services. The primary agencies involved in the provision of public services outlined below.

- *California Code of Regulations Title 24 – Fire Codes*. California Code of Regulations Title 24 refers to the California Building Standards Code (CBSC), which contains complete regulations and general construction building standards of State agencies, including administrative, fire and life safety and field inspection provisions. Part 2, the California Building Code (CBC), was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. In particular, CBC Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, addresses fire safety standards for new construction. CBC Chapter 33, Safeguards During Construction, includes emergency access requirements for new construction. CBSC Part 9 refers to the California Fire Code, which contains other fire safety-related building standards.

- *Senate Bill 50. Senate Bill (SB) 50* Senate Bill 50 (the Leroy F. Greene School Facilities Act of 1998), adopted in 1998, defined the school impact fee needs analysis process in Government Code Sections 65995.5– 65998. Pursuant to its provisions, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. By statute, payment of a statutory fee by developers serves as the total mitigation of the potential impact of a development on school facilities pursuant to the California Environmental Quality Act (CEQA).

- *City of South Gate General Plan*. The South Gate General Plan, as part of its Public Facilities and Services Element, provides information and policy guidance to ensure the provision of public facilities and services will support existing and new development in the City of South Gate. The Element addresses the changing public service and infrastructure needs of South Gate and provides for their logical and timely expansion to keep pace with growth. Policies supporting quality schools, excellent police and fire services,

and well-maintained infrastructure are essential to achieve broader development objectives and support the future envisioned by the residents of South Gate. The Element covers the following topics: police services, fire services, schools and educational facilities.

- *City of South Gate Zoning Ordinance.* The purpose of the Zoning Ordinance is to protect and promote the public health, safety and general welfare of the South Gate community and to implement the policies of the General Plan. The key functions of the Zoning Ordinance are to provide specific development standards and guidelines to facilitate the continuing growth and development of the City. The zoning ordinance will ensure compatibility between different types of development and land uses.

- *Government Code Sections 65995.5– 65998*. Pursuant to Government Code Sections 65995.5– 65998, school districts may collect fees to offset the costs associated with increasing school capacity. The provisions of SB-50, by statute, the payment of a statutory fee by developers serves as the total mitigation of the potential impact of a development on school facilities pursuant to CEQA.

3.15.2.2 Physical Setting

Fire Department

The Los Angeles County Fire Department (LACFD) provides fire protection and first responder emergency medical services to the City of South Gate. There are two fire stations within the City of South Gate in close proximity to the project site. Fire Station 54 is located at 4867 Southern Avenue and is staffed at all times by one captain, one engineer, one firefighter, and three paramedics. This station is located approximately 1.0 miles from the site. Fire Station 57 is located at 5720 Gardendale Street, and is staffed by one captain, one engineer and two firefighters. These facilities are shown in Exhibit 3-11. A battalion chief oversees both fire stations. This station is located approximately 4.1 miles from the project site. According to the South Gate General Plan, there are 35 fire department personnel distributed over three shifts. The average response time is 4 minutes and 58 seconds for emergency calls, and 7 minutes and 6 seconds for non-emergency calls. The average response times for the LACFD Countywide for EMS calls is 7 minutes, 13 minutes and 5 mnutes,23 seconds for structural fires.

Law Enforcement

The South Gate Police Department (SGPD) provides law enforcement services in the City of South Gate. The Department operates out of its headquarters at 8620 California Avenue, as well as a substation in the El Paseo Shopping Center. The Police Station is located approximately 1.5 miles to the west of the site. This facility is shown in Exhibit 3-11. The City is considering a “City Hall Annex” to include a Police Department substation adjacent to the proposed Gateway Development near the intersection of Atlantic Avenue and Firestone Boulevard. The According to the South Gate General Plan, the SGPD has 97 sworn officers, including 1 chief, 3 captains, 5 lieutenants, 11 sergeants and 77 police officers. Currently, the ratio of police per thousand people is 0.9. The national average target staffing ratio is 2.0 officers per thousand. The SGPD has a goal of achieving a ratio of 1.0 officers per thousand residents. The Department also has 45 unsworn positions, which includes administrators, dispatchers, and public safety officers.

Education

Approximately 30,000 students attend some type of educational facility in the City. The City and the project site are located within the attendance boundaries of the Los Angeles Unified School District. The nearest school

campus to the project site is Park Elementary School located in the City of Cudahy. The school facilities in South Gate are shown in Exhibit 3-11.This campus is located approximately 700 feet to the north of the project site.

3.15.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to public services if it would:

- 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 would cause significant environmental impacts, in fire protection; police protection; schools; or other public facilities.

3.15.4 ENVIRONMENTAL IMPACTS

3.15.4.1 Impact Analysis: The project's potential for resulting 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 would cause significant environmental impacts, in fire protection; police protection; schools; or other public facilities.

Fire Department

The project site is currently blighted and is largely unmaintained. Construction activities associated with the development site may result in a temporarily increased demand for fire protections services to the construction site by introducing more occupants onto the site. The Armstrong facility employed 140 full-time employees when it was operational. As indicated previously, the proposed project is anticipated to employ between 250 and 300 persons once it is operational. Because of the development site's proximity to an existing fire station, and the existing response time maintained by the LACFD, the project would receive adequate protection services in the event of an emergency. All construction activities would be subject to compliance with all applicable State and local regulations in order to reduce the risk of construction-related fire, such as installation of temporary construction fencing to restrict site access and maintenance of a clean construction site. As a result, project's construction would be consistent with accepted standards and applicable City regulations. As a result, the construction activities would not require new or physically altered fire services facilities. Therefore, the proposed project's construction would not result in any construction related impacts on fire protection services.

Once occupied, the proposed use may result in an incremental increase in calls for service. This increased demand is due to the introduction of more occupants The Armstrong facility employed 140 full-time employees when it was operational. As indicated previously, the proposed project is anticipated to employ between 250 and 300 persons once it is operational) onto the site upon project completion. Under CEQA, service demand in and of itself does not constitute an environmental impact unless such demand causes a physical change to the environment. The increase in occupants (250 to 300 new employees) on the site is not anticipated to result in an increase in demand for fire protection services high enough to trigger the need to physically construct new fire protection facilities given that the new facility would replace an older obsolete plant facility. As a condition of City approval, the development project would be required to meet all access, water, and fire protection system requirements, per the Building Code, and the California Fire Code as well as all other applicable City Codes.

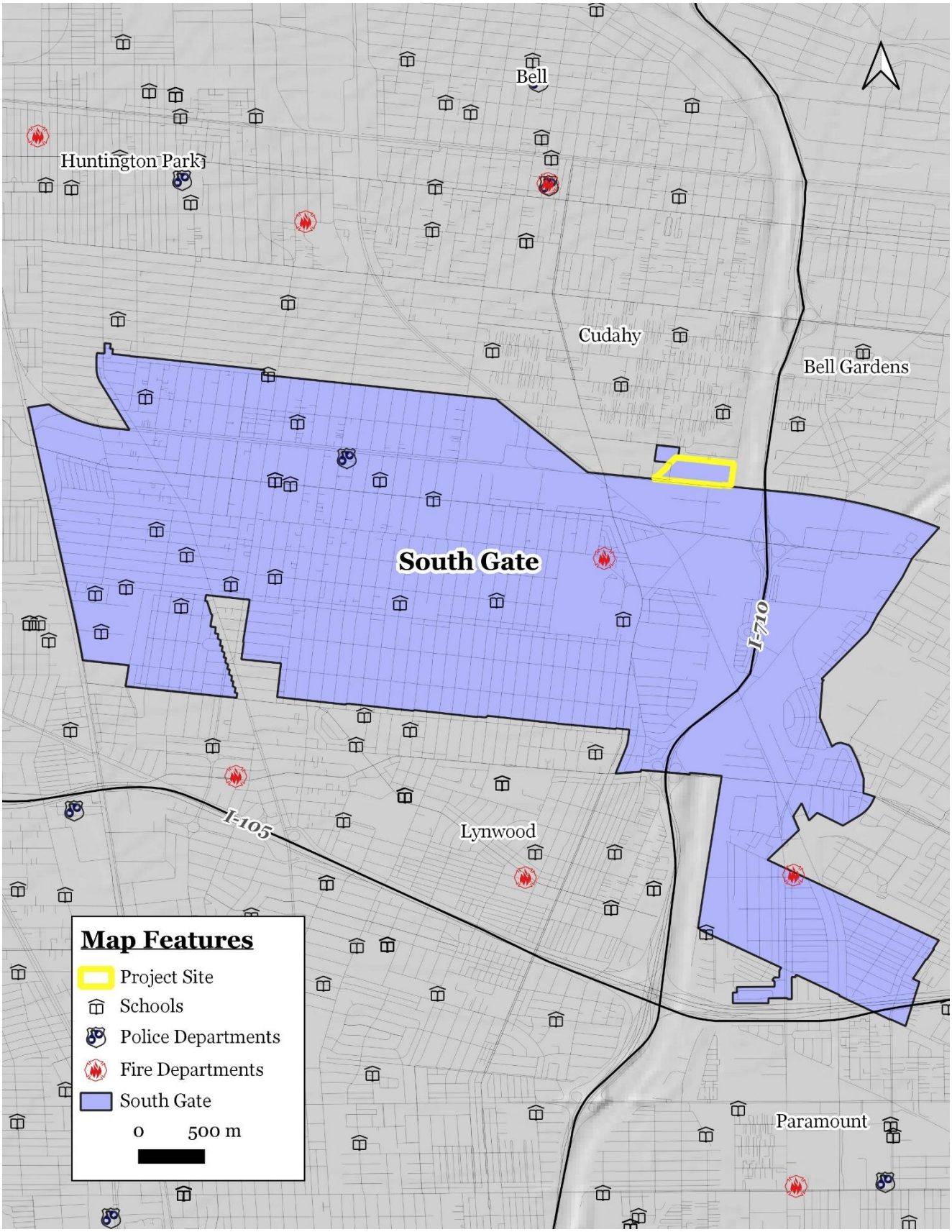


EXHIBIT 3-11
PUBLIC SERVICES MAP
Source: City of South Gate

Required provisions would include meeting the minimum standards for fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes. The new buildings on the development site would be tilt-up concrete with fire alarm systems installed, which would tend to reduce the risk to persons or property from substantial fires. Also, fire prevention systems included at the warehouse facility could include, but not be limited to, provisions for smoke alarms; sprinklers; building and emergency access; adequate emergency notification; and hydrant sizing, pressure, and siting. Adherence to applicable design standards would reduce the project's potential fire-related impacts. Compliance with other measures established by Federal, State, and local regulations would also maintain acceptable service ratios and response times for fire protection services. Therefore, implementation of the proposed project would not require the provision of new or physically altered fire services facilities.

Law Enforcement

Construction associated with the development site may create a negligible temporary increase in demand for police protection services to the site once operations commence since the proposed project would introduce 250 to 300 new employees onto the site. The contractors will have a construction office on-site and will maintain 24-hour security. There are no project elements that would result in the need to construct new police protection facilities. Because of the development site's proximity to the SGPD main station, and the existing service level maintained by the Department, the project would receive adequate protection services in the event of an emergency. The South Gate Police Department has a goal of achieving a ratio of 1.0 officers per thousand residents. The proposed project is an infill development that would replace a former manufacturing use and no residential units would be constructed. As a result, the proposed project would not affect this standard.

All construction activities would be subject to compliance with the Building Code, which adopts by reference the CBSC. Chapter 33, Safeguards During Construction, the CBC includes emergency access requirements which would minimize site safety hazards and potential construction-related impacts to police services. As a result, construction of the proposed project would not result in the need for additional police protection facilities and would not adversely impact SGPD performance standards. Therefore, construction would not trigger the need to construct new facilities that could result in a significant impact. Once operational, the site will be secured by a gate and security personnel will secure the property. No general public access will be permitted. Therefore, the proposed project would no result in any impacts on police protection services.

Under CEQA, service demand in and of itself does not constitute an environmental impact unless such demand causes a physical change to the environment, and there is no aspect of the project's design or operation that would result in the need to construct new police protection facilities. There are no elements related to the proposed project's design and operation that would cause the need to construct new police protection facilities as operation of the development would not result in an increased demand for police protection services. The development site would be designed in compliance with the City of South Gate Building Code, which adopts by reference the CBSC. The CBSC includes emergency access requirements which would minimize site safety hazards and potential operational impacts to police services. The increase in the commuting workforce associated with the new warehouse could result in increased vehicle accidents, calls for emergency medical service, and reported crimes in the area, all of which may lead to an increase in the demand for police services on the site and in the surrounding area. However, the warehouse is expected to operate 24/7 which would help reduce the overall potential for crime on the site (i.e., installation of alarm systems, full time security and monitoring) especially with on-site activities at night.

Thus, project implementation is not anticipated to result in physical impacts associated with the need for, or provision of, new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. In addition, development of the development site would be required to comply

with the provisions of the City's Development Impact Fee program, which requires a fee payment to assist the City in providing police protection services. Development of the development site would increase property tax revenues to provide a source of funding that is sufficient to offset any increases in the anticipated demands for public services generated by this project, including police protection services. The proposed project would be designed per applicable standards required by the SGPD for new development. Additionally, the project proponent would be required to pay required fees to offset law enforcement impacts that may result from the development and occupation of the proposed industrial uses. Therefore, this impact would be less than significant.

Education

Under CEQA, service demand in and of itself does not constitute an environmental impact unless such demand causes a physical change to the environment. There is no aspect of the project's design or operation that would result in the need to construct new school facilities Pursuant to Government Code Sections 65995.5– 65998, school districts may collect fees to offset the costs associated with increasing school capacity. The provisions of SB-50, by statute, the payment of a statutory fee by developers serves as the total mitigation of the potential impact of a development on school facilities pursuant to CEQA.

Conclusions: The analysis determined that the proposed project's implementation the impacts would be less than significant related fire protection, law enforcement, schools, or other public facilities.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: Less than significant Impacts.

3.16 TRANSPORTATION IMPACTS

This section describes the proposed project's impacts with respect to transportation. This section discusses Federal and local regulations and policies pertinent to these issues, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts. The Traffic Study is included in Appendix H.

3.16.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for conflicting with a program plan (such as a general plan or specific plan), ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- The project's potential for conflicting or be inconsistent with CEQA Guidelines §15064.3 subdivision (b).
- The project's potential for substantially increasing 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 for resulting in inadequate emergency access.
- The project's potential for traffic delays, queuing, and lack of signal coordination.
- The project's potential to the roadway pavement and striping.

According to the approved Scoping Agreement prepared for this project, the following intersections are studied for level of service analysis to evaluate potential traffic impacts:

1. Wilcox Avenue at Santa Ana Street (Cudahy);
2. Wilcox Avenue at Cecelia Street (Cudahy) ;
3. Wilcox Avenue at Patata Street (Cudahy);
4. Atlantic Avenue at Santa Ana Street (Cudahy);
5. Atlantic Avenue at Cecelia Street (Cudahy);
6. Atlantic Avenue at Patata Street /Salt Lake Avenue (Cudahy/South Gate);
7. Atlantic Avenue at Azelea West (South Gate);
8. Atlantic Avenue at Firestone Boulevard (South Gate);
9. Atlantic Avenue at Southern Avenue (South Gate);
10. Firestone Boulevard at Mason Street (South Gate);

11. Firestone Boulevard at Firestone Place (South Gate); and,
12. Firestone Boulevard at Rayo Avenue (South Gate).

3.16.2 ENVIRONMENTAL SETTING

3.16.2.1 Regulatory Setting

There are a number of local agencies involved in the development, implementation, and enforcement of regulations related to transportation. The primary regulations and agencies involved in transportation issues are outlined below.

- *Senate Bill 743 (Steinberg*). SB 743 requires the California Governor's Office of Planning and Research to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to LOS as the metric for evaluating transportation impacts under CEQA. SB 743 requires the alternative criteria to promote the reduction of greenhouse gas emissions, development of multimodal transportation networks, and diversity of land uses. The alternative metric for transportation impacts detailed in the CEQA Guidelines is VMT. Jurisdictions had until July 1, 2020 to adopt and begin implementing Vehicle Miles Travelled (VMT) thresholds for traffic analysis. Prior to July 1, 2020, jurisdictions had the option to continue using LOS analysis or converting to VMT analysis once such thresholds were adopted. Technical Advisory on Evaluating Transportation Impacts in CEQA The Governor's Office of Planning and Research (OPR) released the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) in December 2018. The Technical Advisory aids in the transition from LOS to VMT methodology for transportation impact analysis under CEQA. The advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

- *Regional Transportation Plan/Sustainable Communities Strategy*. The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the Federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2020-2050 Connect SoCal 2050. The Plan integrates transportation planning with economic development and sustainability planning and aims to comply with State greenhouse gas emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates, in the RTP/SCS, that the six-county region will have to accommodate 22 million residents, an increase of nearly four million people by 2040, while also meeting the greenhouse gas emissions reduction targets set by the California Air Resources Board. SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. In addition, SCAG has taken on the role of planning for regional growth management.

- *City of South Gate General Plan, Mobility Element*. The purpose of the Mobility Element is to provide a safe, efficient, and adequate circulation system in the City. The Mobility Element is one of the General Plan Elements that is components required by state law (State of California's General Plan Guidelines (Government Code Section 65300- 65307). These guidelines require that a circulation element "…consist of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other public utilities and facilities, all correlated with the land use element of the plan." The Mobility Element meets all of the requirements of state law and provides a comprehensive approach

to local transportation by providing specific goals, policies and plans for multi-modal transportation in the City. Public utilities and facilities are addressed separately in the Public Facilities and Services Element of the General Plan.

3.16.2.2 Physical Setting

Level of Service Metrics

Vehicle delay deficiencies, measured as level of service, are no longer considered as environmental impacts under CEQA. *CEQA Guidelines* Section 15064.3, effective January 1, 2019, "describes specific considerations for evaluating a project's transportation impacts" and provides that, except for roadway capacity projects, "a project's effect on automobile delay (or LOS) shall not constitute a significant environmental impact." (*CEQA Guidelines*, § 15064.3, subd. (a).). However, in over to provide the public and decisionmakers with supplementary information, vehicle delay has been analyzed. Traffic analysis and level of service (LOS) parameters, such as LOS and intersection performance metrics, significant impact thresholds, saturation flow rates for lane groups, and other factors were applied in accordance with the City's currently adopted methods for traffic studies. Intersection operating conditions are defined in terms of "Level of Service" (LOS), a grading scale used to represent the quality of traffic flow at an intersection. Level of Service ranges from LOS "A," representing free-flow conditions, to LOS "F," which indicates failing or severely congested traffic flow. LOS D is the minimum threshold at all key intersections in the urbanized areas. The traffic study guidelines require that traffic mitigation measures be identified to provide for operations at the minimum threshold levels.

To determine the above peak-hour intersection LOS values for each intersection, the intersection capacity utilization (ICU) methodology was used. ICU methodology calculates the efficiency of an intersection to handle certain traffic conditions by summing the volume-to-capacity (V/C) of critical east/west and north/south conflicting movement combinations, which are determined from the volume and direction of entering traffic, and the capacity and configuration of the approach lanes serving this traffic. The resulting ICU is expressed in terms of the overall V/C of the intersection, and adapted to a simplistic grading scale in terms of level of service (LOS), where LOS "A" represents free-flow activity and LOS "F" represents overcapacity operation. Classifications of the six levels of service for signalized intersections are shown in Table 3-13.[119]

Table 3-13
Level of Service Definitions

Level of Service	V/C Ratio or ICU (signalized)
A	0.00 – 0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	1.01 or greater

Table 3-14, included below, provides a description of each specific level of service grade (LOS A through LOS F).

[119] Blodgett Baylosis Environmental Planning. December 2, 2020.

Table 3-14
Level of Service Description

LOS	Description
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.

Existing Traffic Conditions

The proposed site is situated at the northeast corner of Patata Street and Wilcox Avenue in the City of South Gate. The site borders residential areas in the City of Cudahy to the north, Los Angeles River to the east, a Union Pacific Railroad (UPRR) line to the south, and industrial areas in the City of Cudahy to the west. The project site provides its access via three truck routes: Patata Street, Atlantic Avenue, and Firestone Boulevard.

- *Patata Street* is designated as a Collector Street in the Baseline Street Circulation System of Cudahy General Plan 2040, Patata Street is an east- westerly truck route with one lane in each direction. On-street parking is permitted except near the intersection with Atlantic Avenue. The posted speed limit is 35 mph.

- *Atlantic Avenue* is designated as a Boulevard (Primary Arterial) in the Mobility Element of South Gate General Plan 2035, as shown in 3-12 Within the City of South Gate limits, Atlantic Avenue has three northbound lanes and two southbound lanes, separated by raised medians. Multiple left-turn lanes are provided at major intersections along with on-street parking. Atlantic Avenue has been identified as a truck route within City of South Gate boundaries. The posted speed limit is 35 mph. South Gate General Plan 2035 has identified in the Implementation Actions that Atlantic Avenue should be widened from four lanes to six lanes throughout the City.

- *Atlantic Avenue* is designated as a Major Highway (Arterial) north of Patata Street in Cudahy General Plan 2040. Within the City of Cudahy limits, Atlantic Avenue has two lanes in each direction separated by painted islands and two-way-left-turn lanes. The posted speed limit is 35 mph in the project vicinity. On-street parking is generally permitted for both approaches on Atlantic Avenue south of Firestone Boulevard. Onstreet parking is permitted on Atlantic Avenue for the northbound approach only between Mason Street and the railroad tracks with the following restrictions: No parking Proposed 10 from 3 PM to 6 PM Monday through Friday; 20-minute parking from 9 AM to 3 PM Monday through Friday. Within the City of Cudahy, on-street parking is generally permitted on Atlantic Avenue for the southbound approach only.

- *Firestone Boulevard* is designated as a Boulevard (Primary Arterial) and an Enhanced Corridor in South Gate General Plan 2035, running east-westerly currently with three lanes in each direction, separated by raised medians. This roadway is a designated truck route. The speed limit is 35 mph in the project vicinity. South Gate General Plan 2035 has identified in the Implementation Actions that Firestone Boulevard should be widened to a minimum of eight lanes (excluding left turns) between Atlantic Avenue and Garfield Avenue. On-street parking is permitted for both approaches on Firestone Boulevard between Atlantic Avenue and the railroad tracks with the following restrictions: No parking from 6 AM to 9 AM and from 3 PM to 6 PM; 2-hour parking from 9 AM to 3 PM except Sundays; No Parking Friday from 3 AM to 8 AM. Additional on-street parking is provided on Firestone Boulevard at selected areas west of Atlantic Boulevard for the eastbound approach.

- *Rayo Avenue* is designated as a Collector Street and a truck route. The roadway runs north-southerly with one lane in each direction except just south of Firestone Boulevard where two lanes are provided in each direction merging to one lane in each direction along with on-street parking on both sides. The posted speed limit is 35 mph. RayoAvenue is a designated truck route in the City of South Gate General Plan.

- *Wilcox Avenue* is designated as a Collector Street, running north-southerly with one lane in each direction. The posted speed limit is 30 mph in the project vicinity. On-street parking is generally allowed except near intersections. The intersection of Wilcox Avenue and Patata Street is controlled by stop signs on all three approaches.

- *Salt Lake Avenue* is designated as a Collector Street, running east-westerly with one lane in each direction and on-street parking on both sides of the street. The posted speed limit is 35 mph in the project vicinity.

Turning movement counts in the AM and PM peak hours were collected on Tuesday, March 1, 2022. The existing lane configuration is shown in Exhibit 3-12 Existing traffic volumes at the study intersections in the AM and PM peak hours are shown in Exhibits 3-12 and 3-13, respectively.

Table 3-15
Existing Conditions

No.	Study Intersection	Control Type	AM Peak		PM Peak	
			LOS	Delay	LOS	Delay
1	Wilcox Ave at Santa Ana St	AWSC	C	20.9	C	17.0
2	Wilcox Ave at Cecelia St	AWSC	A	9.0	`A	9.2
3	Wilcox Ave at Patata St	AWSC	A	8.3	A	8.5
4	Atlantic Ave at Santa Ana St	TS	C	27.1	C	25.2
5A	Atlantic Ave at Cecelia St	TS	B	11.0	A	6.5
5B	Atlantic Ave at Cecelia St	TS	A	3.2	A	3.8
6	Atlantic Ave at Patata St/Salt Lake Ave	TS	D	50.0	**E**	**63.5**
7	Atlantic Ave at Azalea West	TS	A	3.5	B	10.8
8	Atlantic Ave at Firestone Blvd	TS	**E**	**59.2**	D	53.2
9	Atlantic Ave at Southern Ave	TS	B	17.6	C	22.5
10	Firestone Blvd at Mason St	TS	A	9.9	B	11.5
11	Firestone Blvd at Firestone Pl	TS	A	7.4	B	10.2
12	Firestone Blvd at Rayo Ave	TS	**E**	**68.8**	D	50.5

Note: AWSC = All-way-stop control; TS = Traffic Signal; Delay in seconds

The study intersections operate at LOS D or better in the AM and PM peak hours except for the following intersections:

- #6 Atlantic Ave at Patata St/Salt Lake Ave: LOS E in the PM peak hour
- #8 Atlantic Ave at Firestone Blvd: LOS E in the AM peak hour
- #12 Firestone Ave at Rayon Ave: LOS E in the AM peak hour

3.16.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to transportation if it would:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or,
- Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b);
- Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and,
- Result in inadequate emergency access.

3.16.4 ENVIRONMENTAL IMPACTS

3.16.4.1 Impact Analysis: The project's potential for conflicting with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

The proposed project would involves the construction and subsequent operation of a new warehouse and industrial development that would total 435,420 square-feet of floor area. The proposed development would include a new main building consisting of 435,420 square feet and a smaller truck maintenance building consisting of 16,173 square feet.[120]

Trip Generation

Passenger vehicle trips are estimated utilizing the rates and methodologies outlined in "*Trip Generation, 11th Edition*", published by the Institute of Transportation Engineers (ITE). Truck trips generated by the project are converted into passenger car equivalents(PCE) utilizing the methodology of Recommended Large Truck Mix Percentages as provided in the "*City of Fontana Truck Trip Generation Study*", which is the widely accepted by most transportation authorities in Southern California. With the application of PCEs, the project is expected to generate 82 inbound and 23 outbound trips in the AM peak hour, 31 inbound and 81 outbound trips in the PM peak hour, and 2,002 daily trips. The applicable ITE rates and the project's trip generation are shown in Table 3-15. The proposed project, a high cube storage warehouse (ITE Code 157) represents a maximum worst case, compared to a conventional warehouse (ITE Code 150). The total daily trip rate for a high cube storage warehouse used in Table 3-16 was 2.12 trips per 1,000 square feet of floor area compared to 0.19 trips per day for a conventional warehouse.

[120] California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions.* As Amended 2001. §21067.

Table 3-16
Trip Generation

Land Use	Unit	AM Peak			PM Peak			Daily
		In[2]	Out[2]	Total	In[2]	Out[2]	Total	
Total Vehicle Rates								
High-Cube Cold Storage Warehouse (157)[1]	TSF	0.085	0.025	0.110	0.034	0.086	0.12	2.12
PCE Inbound/Outbound Splits		77%	23%	100%	28%	72%	100%	50%/50%
Passenger Car Equivalent Rate Calculations								
Passenger Cars								
Recommended Mix (%)[3]		79.57%	79.57%	79.57%	79.57%	79.57%	79.57%	79.57%
PCE Factor[3]		1.0	1.0	1.0	1.0	1.0	1.0	1.0
PCE Rates		0.067	0.021	0.088	0.027	0.069	0.095	1.687
2-Axel Trucks								
Recommended Mix (%)[3]		3.46%	3.46%	3.46%	3.46%	3.46%	3.46%	3.46%
PCE Factor[3]		1.5	1.5	1.5	1.5	1.5	1.5	1.5
PCE Rates		0.004	0.001	0.006	0.002	0.005	0.006	0.110
3-Axel Trucks								
Recommended Mix (%)[3]		4.64%	4.64%	4.64%	4.64%	4.64%	4.64%	4.64%
PCE Factor[3]		2.0	2.0	2.0	2.0	2.0	2.0	2.0
PCE Rates		0.008	0.002	0.010	0.003	0.008	0.011	0.197
4+ Axel Trucks		12.33%	12.33%	12.33%	12.33%	12.33%	12.33%	12.33%
Recommended Mix (%)[3]		3.0	3.0	3.0	3.0	3.0	3.0	3.0
PCE Factor		0.031	0.009	0.041	0.012	0.032	0.044	0.784
PCE Rates		0.110	0.033	0.145	0.044	0.114	0.156	2.778
Warehouse NET PCE Rate								
Total Project Trip Generation (Trips, By Vehicle Type)								
High-Cube Cold Storage Warehouse (157) 435.42 TSF								
Passenger Cars		29	9	38	12	30	41	735
2-Axel Trucks		2	0	3	1	2	3	48
3-Axel Trucks		4	1	4	1	3	5	86
4+ Axel Trucks		14	4	18	5	14	19	341
Total Trucks		20	5	25	7	19	27	475
Total Vehicles		49	14	63	19	49	68	1,210
Total Project Trip Generation (Passenger Car Equivalent Trips, By Vehicle Type)								
Passenger Cars		29	9	38	12	30	41	735
Truck PCE								
2-Axel Trucks		3	0	5	2	3	4	72
3-Axel Trucks		8	2	8	2	6	10	172
4+ Axel Trucks		42	12	54	15	42	57	1,023
Total Truck PCE		53	14	67	19	51	71	1,267
Total PCE		**82**	**23**	**105**	**31**	**81**	**112**	**2,002**

TSF = Thousand Square Feet
1. Source: Institute of Transportation Engineers (ITE) Trip Generation, 11th Edition.
2. Directional distribution is based on Warehousing use (LU: 150)
3. Recommended Large Truck Mix Percentages per City of Fontana Truck Trip Generation Study for Heavy Warehouse uses, August 2003.

Trip Distribution and Assignment

Trip distribution represents the directional orientation of traffic to and from the proposed project. Directional orientation is largely influenced by the geographical location of the site, among many other factors.

Traffic Assignment

The traffic assignment to and from the site has been based upon the results of trip generation, trip distribution, and access layouts. The combined traffic assignment, including passenger car and truck trips with PCE conversion, in the AM and PM peak hours are illustrated in Exhibits 3-12 and 3-13, respectively.

Existing Conditions Plus Project

Traffic volumes at the study intersections for existing conditions plus project are shown in Exhibits 3-14 and 3-15,respectively. The level of service and delays are shown in Table 3-15. The analysis worksheets can be found in Appendix C of the Traffic Study. All study intersections operateat LOS D or better in the AM and PM peak hours except for the following intersection:

- Atlantic Ave at Patata St/Salt Lake Ave (#6): LOS F in the PM peak hour
- Atlantic Ave at Firestone Blvd (#8): LOS E in the AM and PM peak hour
- Firestone Blvd at Rayo Ave (#12): LOS E in the AM and PM peak hour

Table 3-17
Existing Plus Project Conditions

No.	Study Intersection	Control Type	AM Peak		PM Peak	
			LOS	Delay	LOS	Delay
1	Wilcox Ave at Santa Ana St	AWSC	C	21.4	C	17.2
2	Wilcox Ave at Cecelia St	AWSC	A	9.1	A	9.2
3	Wilcox Ave at Patata St	AWSC	A	9.1	A	9.3
4	Atlantic Ave at Santa Ana St	TS	C	27.1	C	25.1
5A	Atlantic Ave at Cecelia St	TS	B	11.0	A	6.5
5B	Atlantic Ave at Cecelia St	TS	A	3.2	A	3.8
6	Atlantic Ave at Patata St/Salt Lake Ave	TS	D	52.8	**F**	**82.2**
7	Atlantic Ave at Azalea West	TS	A	3.4	B	10.5
8	Atlantic Ave at Firestone Blvd	TS	**E**	**62.7**	**E**	**55.9**
9	Atlantic Ave at Southern Ave	TS	B	17.6	C	22.6
10	Firestone Blvd at Mason St	TS	A	9.6	B	11.5
11	Firestone Blvd at Firestone Pl	TS	A	7.5	A	7.4
12	Firestone Blvd at Rayo Ave	TS	**E**	**69.6**	E	55.1

Note: AWSC = All-way-stop control; TS = Traffic Signal; Delay in seconds

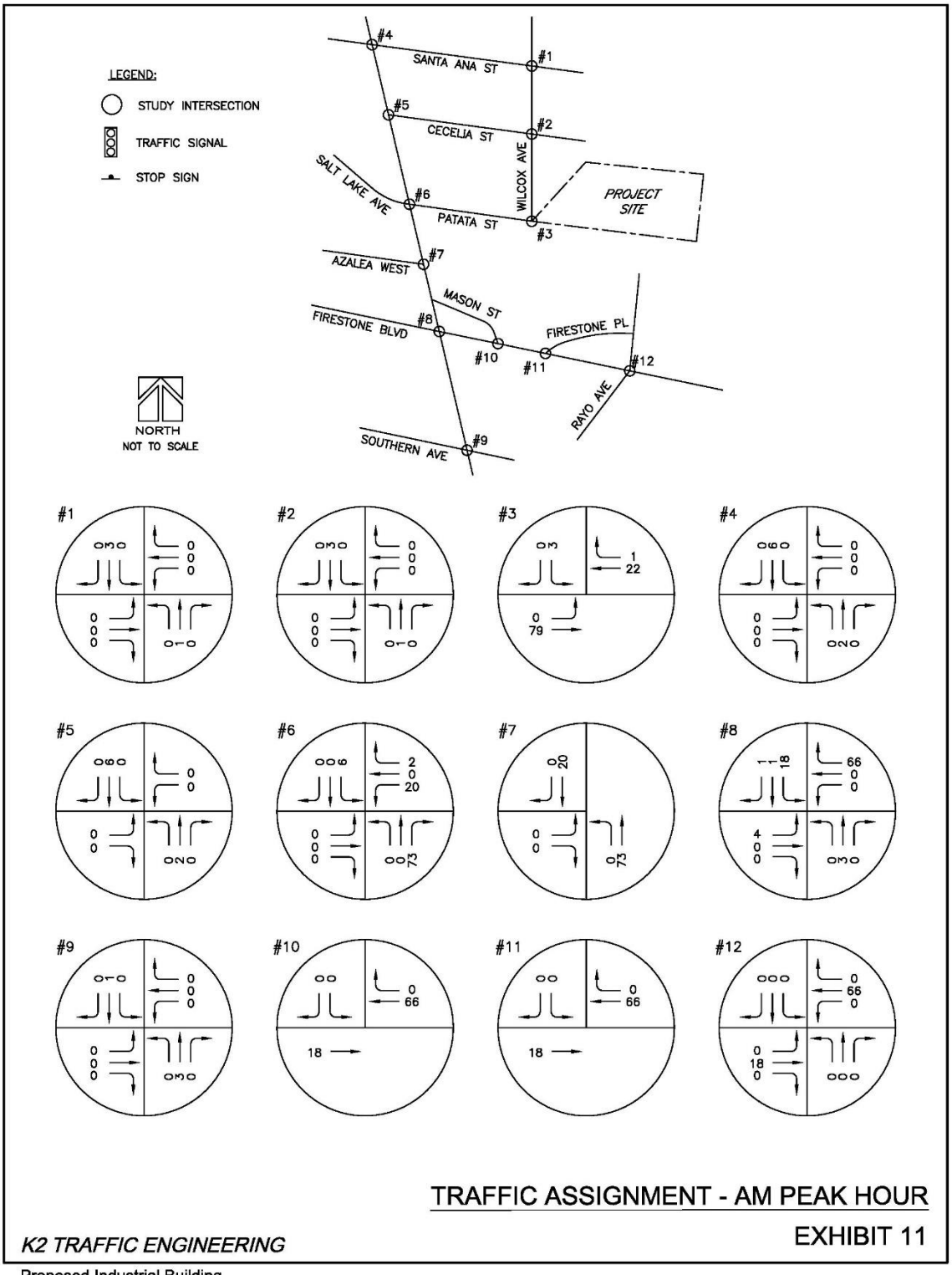


EXHIBIT 3-12
TRAFFIC ASSIGNMENT-AM PEAK HOUR

Source: K2 Traffic Planners

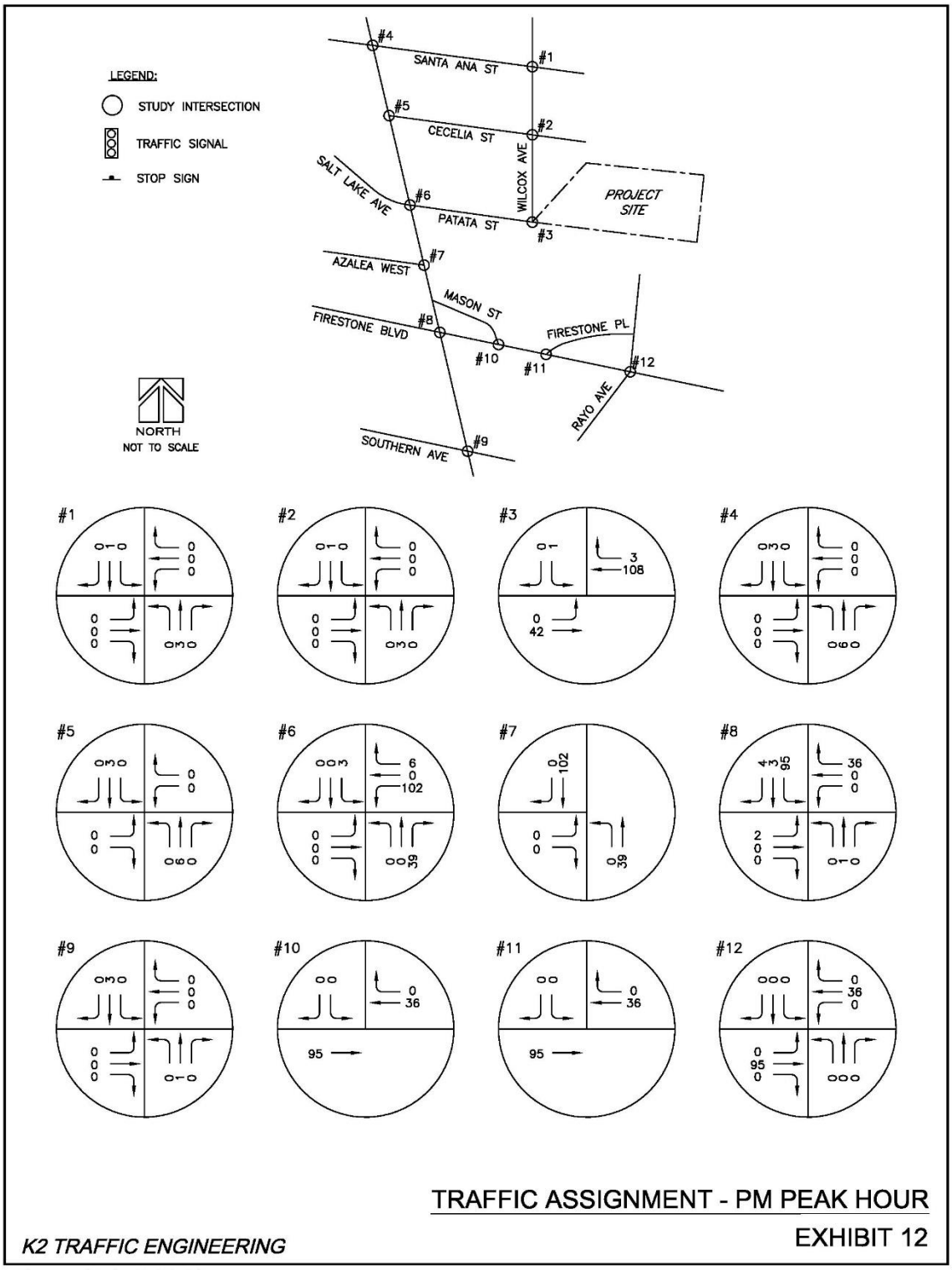
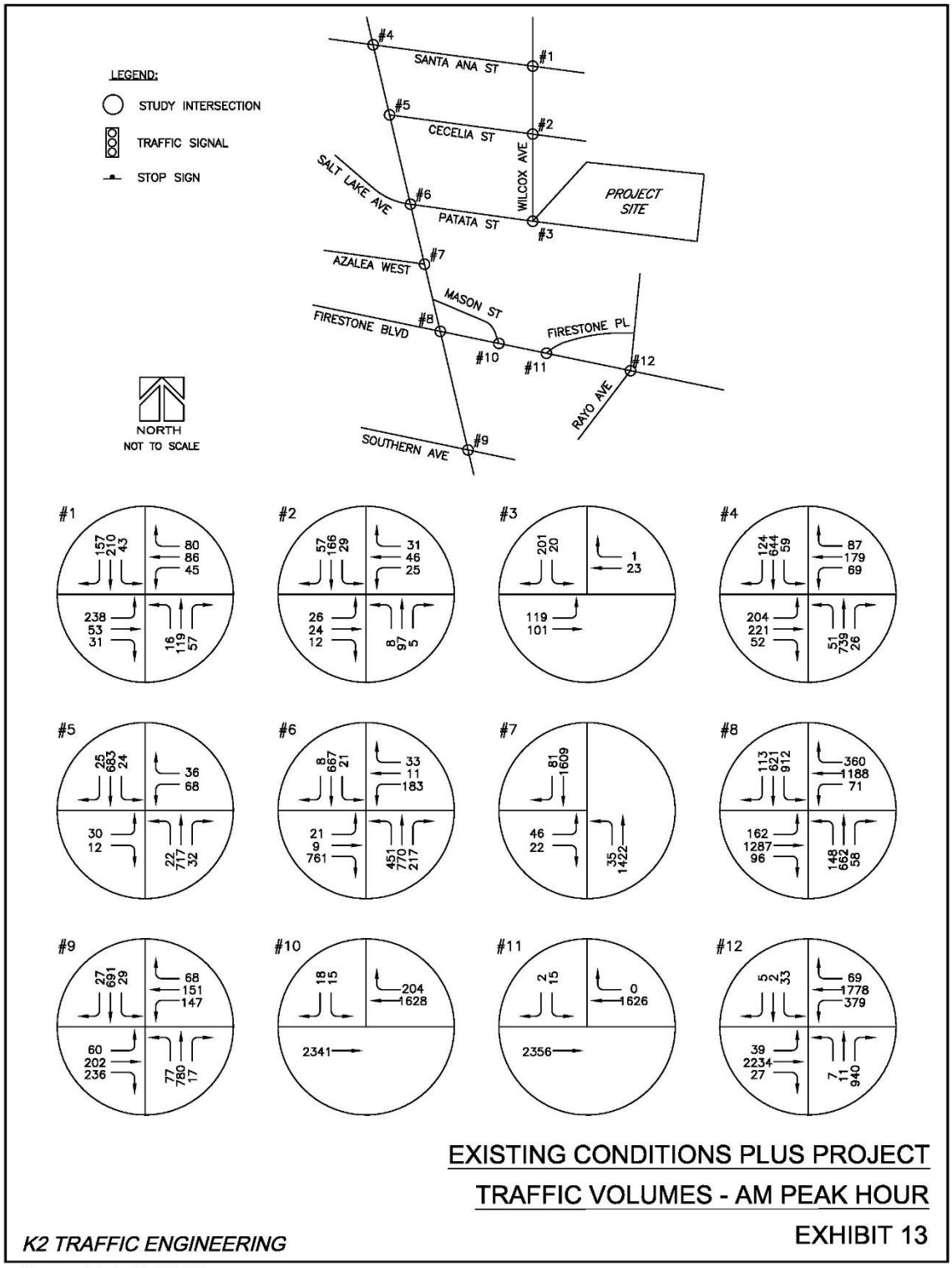


EXHIBIT 3-13
TRAFFIC ASSIGNMENT-PM PEAK HOUR

Source: K2 Traffic Planners



Proposed Industrial Building
5037 Patata Street, South Gate

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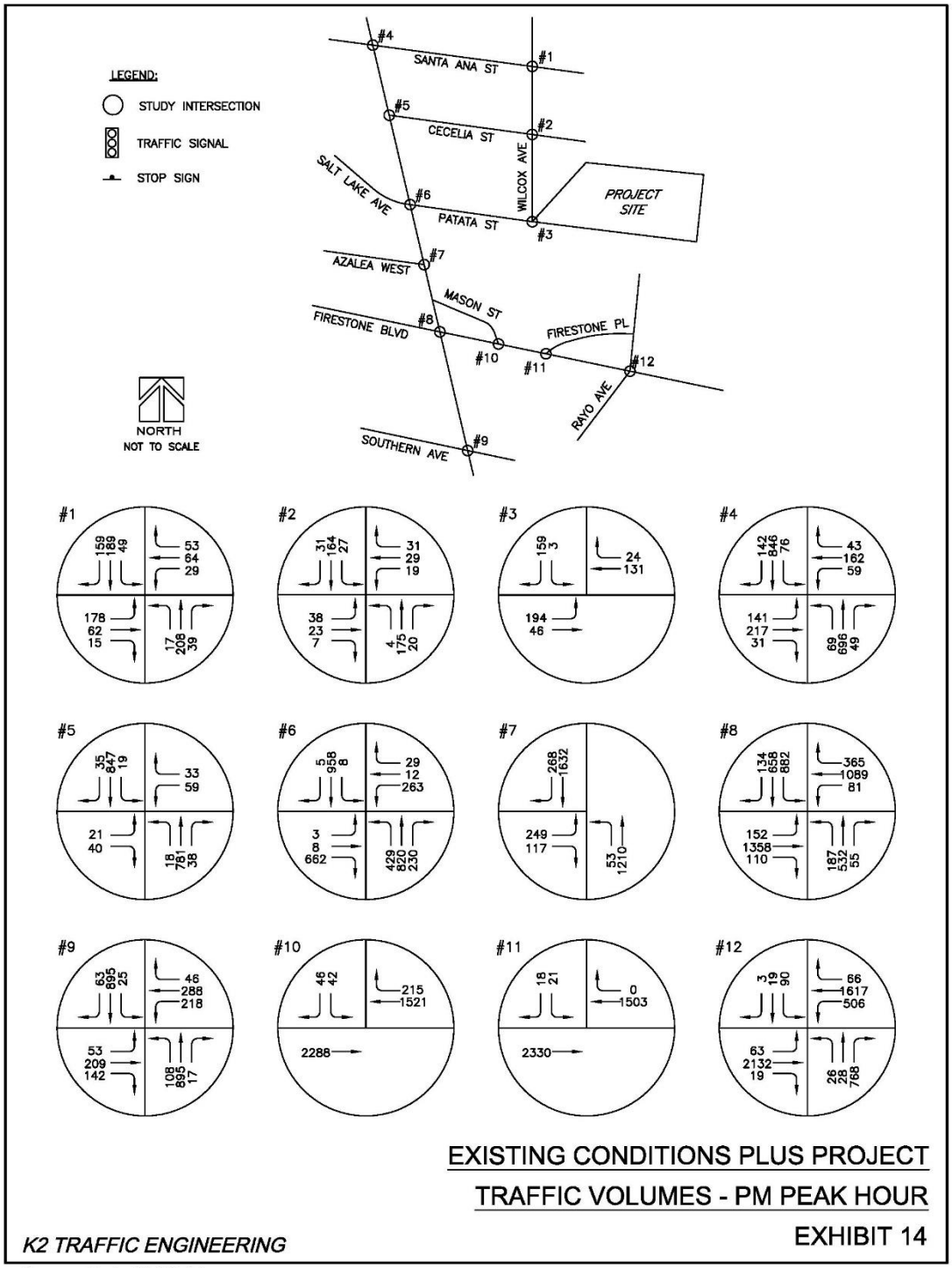
EXHIBIT 3-14
EXISTING + PROJECT CONDITIONS-AM PEAK HOUR

Source: K2 Traffic Planners



Proposed Industrial Building
5037 Patata Street, South Gate

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EXHIBIT 3-15
EXISTING + PROJECT CONDITIONS-PM PEAK HOUR

Source: K2 Traffic Planners

Operational Deficiency Analysis

Operational deficiency analysis based on opening year (2024) conditions in the AM and PM peak hours are shown in Tables 3-18 and 3-19, respectively. Project traffic is expected to result in an operational deficiency at the following intersection:

- #6 Atlantic Avenue at Patata Street / Salt Lake Avenue in the PM peak hour.

Table 3-18
Operational Deficiency Analysis – Opening Year (AM Peak Hour) 2024

Intersection	Without Project		With Project		Meet Target LOS	Operational Deficiency
	LOS	Delay	LOS	Delay		
#1 Wilcox Ave at Santa Ana St	C	24.2	C	24.6	OK	No
#2 Wilcox Ave at Cecilia St	A	9.1	A	9.2	OK	No
#3 Wilcox Ave at Patata St	A	8.3	A	9.1	OK	No
#4 Atlantic Ave at Santa Ana St	C	27.2	C	27.3	OK	No
#5A Atlantic Ave at Cecilia St	B	11.1	B	11.0	OK	No
#5B Atlantic Ave at Cecilia St	A	3.2	A	3.2	OK	No
#6 Atlantic Ave at Patata St/Salt Lake Ave	D	54.0	E[1]	56.9	OK	No
#7 Atlantic Ave at Azalea West	A	3.5	A	3.4	OK	No
#8 Atlantic Ave at Firestone Blvd	E[1]	62.5	E[1]	66.9	OK	No
#9 Atlantic Ave at Southern Ave	B	18.2	B	18.2	OK	No
#10 Firestone Blvd at Mason St	A	9.3	A	9.1	OK	No
#11 Firestone Blvd at Firestone Pl	C	31.8	A	7.4	OK	No
#12 Firestone Blvd at Rayo Ave	E[1]	76.7	E[1]	77.7	OK	No

[1] South Gate General Plan 2035: LOS E may be permitted at intersections on truck routes (Policy ME 1.1-P.3).

Table 3-19
Operational Deficiency Analysis – Opening Year (PM Peak Hour) 2024

Intersection	Without Project		With Project		Meet Target LOS	Operational Deficiency
	LOS	Delay	LOS	Delay		
#1 Wilcox Ave at Santa Ana St	C	18.4	C	18.5	OK	No
#2 Wilcox Ave at Cecilia St	A	9.4	A	9.4	OK	No
#3 Wilcox Ave at Patata St	A	8.6	A	9.3	OK	No
#4 Atlantic Ave at Santa Ana St	C	25.3	C	25.3	OK	No
#5A Atlantic Ave at Cecilia St	A	6.6	A	6.6	OK	No
#5B Atlantic Ave at Cecilia St	A	3.8	A	3.8	OK	No
#6 Atlantic Ave at Patata St/Salt Lake Ave	E[1]	69.1	**F**[1]	**88.4**	**Failed**	**Yes**
#7 Atlantic Ave at Azalea West	B	10.8	B	10.6	OK	No
#8 Atlantic Ave at Firestone Blvd	D	54.8	E[1]	58.0	OK	No
#9 Atlantic Ave at Southern Ave	C	23.5	C	23.6	OK	No
#10 Firestone Blvd at Mason St	B	11.0	B	10.3	OK	No
#11 Firestone Blvd at Firestone Pl	A	7.8	C	21.2	OK	No
#12 Firestone Blvd at Rayo Ave	E[1]	54.6	E[1]	59.8	OK	No

[1] South Gate General Plan 2035: LOS E may be permitted at intersections on truck routes (Policy ME 1.1-P.3

Mitigation Measures

The following mitigation measures are recommended in order to ensure that the project does not conflict with a program plan, ordinance or policy addressing the circulation system:

Intersection (#6) of Atlantic Avenue and Patata Street / Salt Lake Avenue:

- Re-stripe Salt Lake Avenue for the eastbound traffic to provide a shared right-thru-left turn lane and an exclusive right-turn lane.
- Re-stripe Patata Street for westbound traffic to provide a shared right-thru-leftturn lane and an exclusive left-turn lane.

With implementation of the above operational improvements, the project will not result in any conflict with a program plan, ordinance or policy addressing the circulation system.

Table 3-20
Operational Improvement Analysis

#6 Atlantic Ave at Patata St / Salt Lake Ave	Opening Year Without Project		Opening Year Plus Project & Operational Improvements			Operational Deficiency
	LOS	Delay	LOS	Delay	Target LOS	
AM Peak Hour	D	54.0	D	41.4	OK	No
PM Peak Hour	E	69.1	E	61.1	OK	No

Conclusions: Operational deficiency analysis based on opening year (2024) conditions in the AM and PM peak hours are shown in Tables 3-18 and 3-19, respectively. Project traffic is expected to result in operational deficiency at the following intersection: #6 Atlantic Avenue at Patata Street / Salt Lake Avenue in the PM peak hour.

Mitigation Measures: The following mitigation measures are recommended:

Intersection (#6) of Atlantic Avenue and Patata Street / Salt Lake Avenue:

- Re-stripe Salt Lake Avenue for the eastbound traffic to provide a shared right-thru-left turn lane and an exclusive right-turn lane.
- Re-stripe Patata Street for westbound traffic to provide a shared right-thru-leftturn lane and an exclusive left-turn lane.

Significance after Mitigation: No significant impacts would occur upon implementation of the mitigation.

3.16.4.2 Impact Analysis: he project's potential for conflicting or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)..

According to CEQA Guidelines *§15064.3 subdivision (b)(1),* vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. The proposed project is located within ½ mile of two major transit corridors (Atlantic Avenue and Firestone Boulevard). In addition, the project site is located within ½ mile of the proposed new transit station for Metro's West Santa Ana Branch light rail.

Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact. The project's implementation will have less than

significant impacts since the project will recycle an existing undeveloped and underutilized properties located in established urban areas. When new development is located in a more rural setting, employees, patrons, visitors, and residents may have to travel further since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, travel distance is typically reduced when development is located in urban areas. As a result, the potential impacts are considered to be less than significant. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, there will not be a significant change in the traffic circulation over that which presently exists. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and less than significant impacts will occur.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impacts.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: The analysis determined that no impacts would occur.

3.16.4.3 Impact Analysis: The project's potential for substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Intersection Queuing Analysis

The study examined the 95th percentile queue for left-turn and right-turn pockets at the signalized study intersections. The queuing conditions are shown in Table 13 included in the Traffic Study. Queue analysis outputs can be found in Appendix D of the Traffic Study.

The Traffic Study found that currently traffic signal systems along Atlantic Avenue and Firestone Boulevard have not been fully synchronized to form a network of progression to carry the regional pass-through traffic. It is apparent that a future Corridor Study for signal optimization and queuing management along Atlantic Avenue and Firestone Boulevard could greatly benefit nearby cities and communities such as Lynwood, South Gate, Cudahy, Bell, and Maywood. Nonetheless, this study has identified the following locations where modification ofpavement striping may be applied to increase queuing capacity of left-turn pockets:

Intersection (#4) of Atlantic Avenue and Santa Ana Street: Revise striping to extend the eastbound left-turn lane from 85 feet to 240 feet.

Intersection (#5) of Atlantic Avenue and Cecelia Street: Revise striping to extend the westbound left-turn lane from 70 feet to 110 feet.

I*ntersection (#9) of Atlantic Avenue and Southern Avenue:* Revise striping to extend the eastbound left-turn lane from 100 feet to 200 feet.

Intersection (#10) of Firestone Boulevard and Mason Street: Paint red curb on Mason Street to prohibit parking on the west side within 80 ofthe crosswalk.

Railroad Crossing

There are two at-grade railroad crossings on Atlantic Avenue between Patata Streetand Azalea West. Both railroad lines are operated and maintained by UPRR. Both lines provide local switching service, with each line typically handling about 4 to 6 trains per day. UPRR does not have a fixed train schedule and train arrivals are based on the specific requests of the day placed by industrial manufactories such as Titan Terminal &Transport and Shultz Steel. Railroad operation analysis is beyond the scope of traffic study for a local development as defined in the Los Angeles County *Traffic Impact Study Guidelines*.

Active operation of at-grade railroad crossing will naturally generate intermittent traffic jams especially on regional arterials such as Atlantic Avenue. Railroad Grade Separation can be one of the most effective measures to mitigate the negative impact ofrailroad crossings on major arterials with high traffic volumes. Those major infrastructures require extensive long-term planning and complex collaboration involving numerous authorities and, therefore, not discussed in depth hereon.

Site Access

Site access is provided by three proposed driveways located in the cul-de-sac of Patata Street just east of Wilcox Avenue. Each driveway will be equipped with a power operated gate for access control. Site access appears adequate for the intended uses, including semi-trailers.

Conclusions: The analysis determined that the proposed project's implementation would not result in any significant impact directly related to the project's future traffic.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts would occur.

3.16.4.4 Impact Analysis: The project's potential for resulting in inadequate emergency access.

At no time will access to and from any adjacent properties be obstructed during the project's construction and operation. As a result, no impacts will occur.

Conclusions: The proposed project's implementation would not result in any impacts on this issue.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts would occur.

3.17 TRIBAL/CULTURAL RESOURCES

This section describes the proposed project's impacts with respect to tribal/cultural resources. This section discusses applicable regulations and policies pertinent to tribal/cultural resources, assesses the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts.

3.17.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for causing 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: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

- The project's potential for causing a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k).

3.17.2 ENVIRONMENTAL SETTING

3.17.2.1 Regulatory Setting

There are a number of local agencies involved in the development, implementation, and enforcement of regulations related to tribal/cultural resources.

- *California Assembly Bill 52*. AB-52 required an update to Appendix G (Initial Study Checklist) of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. The Tribal Cultural Resources" contains the added questions. AB 52 also requires public agencies to consult with tribes during the CEQA process. AB 1561 (Garcia, 2020) extended by 30 days tribes' time for response for any housing development project application completed between March 4, 2020, and December 31, 2021.

- *Public Resources Code Section 5024.1 and the California Register of Historical Resources* Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC §5024.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHL) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest (PHI) program, identified as significant in historical resources surveys or designated by local landmarks programs, may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the SHRC determines that it meets one or more of the following criteria (listed under PRC §5024.1(c)), which are modeled on NRHP criteria:

  Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

  Criterion 2: It is associated with the lives of persons important in our past.

  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.

  Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

  Under PRC §5024.1 and 14 CCR §4852(c), a cultural resource must retain integrity to be considered eligible for the CRHR. Specifically, it must retain sufficient character or appearance to be recognizable as a historical resource and convey reasons of significance. Integrity is evaluated with regard to retention of such factors as location, design, setting, materials, workmanship, feeling, and association. Cultural sites that have been affected by ground-disturbing activities often lack integrity because they have been directly damaged or removed from their original location, among other changes.

- *State Regulations.* The State of California historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA); Public Resources Code. A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, which is historically or archaeologically significant. Section 15064.5 of the CEQA Guidelines specifies criteria for evaluating the importance of cultural resources. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. CEQA, as codified at PRC Sections 21000 et seq., is the principal statute governing the environmental review of projects in the State. As defined in PRC Section 21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

  - Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;

  - Has a special and particular quality such as being the oldest of its type or the best available example of its type; and,

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

- *Health and Safety Code, Sections 7050.5 and 7052* State Health and Safety Code (HSC) §7050.5, declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease, and the county coroner must be notified. HSC §7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives. More precisely, if human remains are encountered, State HSC §7050.5 states that: a) "Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.995 of the Public Resources Code. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (l) of Section 5097.946 of the Public Resources Code or to any person authorized to implement Section 5097.987 of the Public Resources Code. b) 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 or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code8 , that the remains are not subject to the provisions of Section 274919 of the Government Code or any other related 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 for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.9810 of the Public Resources Code. 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. c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or 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."

- *City of South Gate Municipal Code.* The Municipal Code, Chapter 7.68, governs cultural resources in the City. The primary purpose of this chapter is to protect, enhance and perpetuate areas, streets, places, buildings, structures, outdoor works of art, natural features and other similar objects which are reminders of past eras, events, and persons important in local, state or national history.

3.17.2.2 Physical Setting

The first known projectile points in North America have been dated from 13,000 years Before Present (BP), with lanceolate fluted points (referred to as Clovis points) first found in in sites located in central and eastern North America and stemmed projectile points from sites in areas of western North America that were not glaciated. The oldest California radiocarbon date for a site in California (as of 2007) was from archaeological site dated as early as 13,500 years BP. The radiocarbon date corresponds to the period of fluted points that have been found throughout California although projectile points and other chronologically and culturally informative materials are absent from some of the samples. During the early Post-Glacial Period (after 8,500 BP) the Southern California climate became warmer and drier. Groundstone artifacts that include manos and metates correspond to the Early Period. The Early Period in Southern California begins as early or earlier than 8,000 BP and ends by about 2,800 BP. The Early Period corresponds to the earliest known sites in Southern California with year-round habitation and cemeteries. Manos and metates consist of a variety of types. Most annual and biennial wild seed plant types in Southern California are best adapted for warm and dry environments which is a summer seed source). Annual and biennial seed crops are highly reliable, nutritious, and productive. Annual and biennial seed

producers are also, diverse and afford reliable seed production throughout the year. Compared to later periods, utilitarian artifacts are most frequently found with Early Period burials.

Manos and metates are "kitchen tools" and concentrate within Early Period habitation sites in Southern California. Other kinds of lithics that correspond to the Early Period include many kinds of core tools (e.g., hammers, choppers, and scraper planes), knives, bifaces, scrapers (many types), gravers, burins, dart points, and compound bone fishhooks. Sedentism apparently increased in areas with abundant resources that were available for longer periods. Arid inland regions and offshore desert islands (e.g., San Nicolas Island) provided less opportunity for long-term residence without trade and possibly for more mobile subsistence. The Early Period ends about 2,800 BP (King 1990)

The Middle Period lasted from about 2,800 BP to 750 BP (King 1990). Excavated assemblages retain many attributes of the Early Period but with more diverse artifact types. Middle Period sites can contain large-stemmed or notched small projectile points suggestive of bow and arrow use, especially near the end of the Period, and the use of portable grinding tools continued. Intensive use of mortar and pestles signaled processing of acorns as the primary vegetative staple as opposed to a mixed diet of seeds and acorns. Because of a general lack of data, neither the settlement and subsistence systems nor the cultural evolution of this Period are well understood, but it is very likely that the nomadic ways continued. It has been proposed that sedentism increased with the exploitation of storable food resources, such as acorns, but coastal sites from the Period exhibit higher fishing activity than in previous periods. The first permanently occupied villages make their appearance in this Period.

Extending from 750 BP to Spanish Contact in 1769, the Late Prehistoric Period includes changes in trade networks and political and secular economic subsystems. There was also a differentiation of types of political economies. Exploitation of marine resources continued to intensify. Assemblages characteristically contain projectile points, and toward the end of the Period the size of the points decreased and notched and stemmed bases appeared, which implies the use of the bow and arrow. Use of personal ornaments such as shell beads, were widely distributed east of the coast, suggesting well-organized and codified trade networks. Additional assemblages in this Period included steatite bowls, asphaltum, grave goods, and elaborate shell ornaments. The use of bedrock milling stations was widespread during this horizon. Increased hunting efficiency and widespread exploitation of acorns provided reliable and storable food resources. Village size increased during this time, and some of these villages may have held 1,500 or more residents. Analyses of skeletons showed that the first signs of malnutrition appeared in this Period, signaling greater competition for food resources.

The earliest part of this Period may have seen an incursion of Cupan-Takic speakers from the Great Basin may have replaced the Hokan speakers in the area. At the time of Spanish conquest, the Cupan-Takic speakers were distributed throughout Orange County, western Riverside County, and the Los Angeles Basin (Gabrieleño, Juaneño, and Cahuilla peoples). Serrano-Takic speakers are now represented by the Serranos in the San Bernardino Mountains. At the time of Spanish conquest, local indigenous groups were composed of constantly moving and shifting clans and cultures. Early ethnographers applied the concept of territorial boundaries to local indigenous groups purely as a conceptualization device, and the data was based on fragmented information provided to them from second-hand sources. At least one Native American group, the Gabrieleño is known to have occupied or utilized resources within the vicinity of the project site at different points in history.

The Gabrieleño ethnographic accounts of Native Americans indicate that the Gabrieleño once occupied the region that encompasses the project area. At the time of contact with Europeans, the Tongva were the main occupants of the southern Channel Islands, the Los Angeles Basin, much of Orange County, and extended as far east as the western San Bernardino Valley. The term "Gabrieleño" came from the group's association with Mission San Gabriel Arcángel, established in 1771. However, today the group prefers to be known by their ancestral name, Tongva. The Tongva are believed to have been one of the most populous and wealthy Native American tribes in

Southern California prior to European contact, second only to the Chumash. The Tongva occupied numerous villages with populations ranging from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Tongva society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. By the late 18th Century, the Tongva population had significantly dwindled due to the introduction of diseases and dietary deficiencies. Tongva communities near the missions disintegrated as individuals succumbed to Spanish control, fled the region, or died. Later, many of the Tongva fell into indentured servitude to Anglo-Americans. By the early 1900s, few Tongva people had survived and much of their culture had been lost though by the 1970s, a revival of the Tongva culture began which continues today with growing interest and support.

3.17.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to tribal/cultural resources if it would:

- 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: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe; or,

- Cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k).

3.17.4 ENVIRONMENTAL IMPACTS

3.17.4.1 Impact Analysis: The project's potential for causing 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: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

In accordance with CEQA Guidelines, the site was assessed for the project's potential for an adverse impact on known and potential cultural resources at the project site. Results from the SCCIC indicate that two recorded historic resources are within the 0.5-mile search radius of the project site, none of which are located within the project boundaries. Of the seven area-specific survey reports on file within the 0.5-mile radius; one report (LA-11993) addresses the project site, and two reports (LA-08255 and LA-04834) are immediately south of the project boundaries. This indicates that the project site has previously been surveyed for cultural resources. No additional cultural resources were identified within the project site boundaries. The NAHC Sacred Lands File search reported negative results for Native American cultural resources.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact related to tribal cultural resources. As a result, no impacts would occur.

Mitigation Measures: No mitigation is required since no impacts were identified.

Significance after Mitigation: The analysis determined that no impacts would occur.

3.17.4.2 Impact Analysis: The project's potential for causing a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: 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 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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe5020.1(k).

On August 12, 2021, FCS sent a request to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response was received on October 12, 2021, indicating that the Sacred Lands File search failed to locate the presence of Native American cultural resources within the project site. The NAHC included a list of eight tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by implementation of the proposed project are addressed, a letter containing project information and requesting additional information was sent to each tribal representative on October 15, 2021 pursuant to the requirements of AB-52. One response was received on October 15, 2021, from the Gabrieleño Band of Mission Indians-Kizh Nation requesting Lead Agency contact information for the City of South Gate. No additional responses have been received to date and the mandatory 30-3ay consultation period has expired.

Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, the survey considered the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be low to moderate.

Conclusions: Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, no impacts on tribal cultural resources would result

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts would occur.

3.18 UTILITIES & SERVICE SYSTEMS

This section describes the regulatory setting with respect to utilities and service systems, discusses the proposed project's impacts, and outlines mitigation if required.

3.18.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for requiring or resulting in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

- The project's potential for having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

- The project's potential for resulting in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- The project's potential for generating 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.

- The project's potential for complying with Federal, State, and local management and reduction statutes and regulations related to solid waste.

3.18.2 ENVIRONMENTAL SETTING

3.18.2.1 Regulatory Setting

There are a number of regulations that are related to public utilities and service systems. The primary regulations involved are outlined below.

- *Clean Water Act*. The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. The CWA became the Act's common name in 1972. Thereafter, the CWA established the regulation of discharges of pollutants into waters of the United States by the EPA. Under the CWA, the EPA can implement pollution control programs and set water quality standards. Additionally, the CWA makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained pursuant to its provisions.

- *Senate Bill 610*. Senate Bill (SB) 610 requires the preparation of a water supply assessment to examine existing water supply entitlements, water rights, and water service contracts relevant to the water supply for a proposed project. Projects required to prepare a water supply analysis (WSA) if it meets one of the following criteria as defined by SB 610:

  - Residential development of more than 500 dwelling units
  - Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor area
  - Commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area
  - Hotel or motel, or both, having more than 500 rooms
  - Industrial, manufacturing or processing plant, or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
  - Mixed-use project that includes one or more of the projects specified above
  - Project that would demand an amount of water equivalent to, or greater than, the amount of water required for 500 dwelling units.

- *California Integrated Waste Management Board*. The California Integrated Waste Management Board (CIWMB) requires the City to comply with the California Integrated Waste Management Act of 1989. This act requires each California city and county to divert 50 percent of its solid waste through source reduction, recycling, and composting. This ordinance requires recycling collection and loading areas in all development projects. The requirements now call for a waste diversion rate of 75% by the year 2020.

- *City of South Gate General Plan*. The South Gate General Plan, as part of its Public Facilities and Services Element, provides information and policy guidance to ensure the provision of public facilities and services will support existing and new development in the City of South Gate. The Element addresses the changing public service and infrastructure needs of South Gate and provides for their logical and timely expansion to keep pace with growth. Policies supporting quality schools, excellent police and fire services, and well-maintained infrastructure are essential to achieve broader development objectives and support the future envisioned by the residents of South Gate. The Element covers the following topics: Solid Waste and Recycling, Water Service, Wastewater, and Stormwater.

3.18.2.2 Physical Setting

Water Service

The City of South Gate manages and operates wells, conduits, pipes, fire hydrants, and reservoirs. The water system in South Gate is regulated through federal law, state law, the South Gate Municipal Code, and court decisions. The City has a total of 16,218 metered connections. Seventy-six percent of water is used by residential users, ten percent commercial, seven percent industrial, three percent public/institutional, and three percent other users. The City of South Gate uses groundwater from the City wells as its primary source. Water generated from wells is chlorinated and distributed to City customers or stored in reservoirs. The total capacity of both active and stand-by wells is 32.97 million gallons per day (MGD), or 101.19 acre-feet per day. This represents a surplus over the City's average daily demand of 9.32 MGD, and the City's maximum daily demand of 16.78 MGD. Because the total capacity of these existing wells exceeds maximum daily demand, additional wells are not required.

However, reservoir storage capacity needs to be improved and additional reservoirs or storage capacity needs to be developed. In addition to its own sources, the City also has agreements to purchase water from other agencies including the Metropolitan Water District of Southern California (MWD), the City of Downey and the Golden State Water Company. The City of South Gate's water system consists of 145 miles of main lines, fourteen groundwater wells (11 of which are active), and 13.1 million gallons of water storage capacity. This storage includes two elevated tanks, four ground level tanks, and one underground concrete storage tank. Based on regulatory, fire flow and emergency requirements, the City should have total storage capacity of 26.9 million gallons. Therefore, the City currently has a storage deficit of 13.8 million gallons. To respond to this need, the City is planning the development of two reservoirs. The distribution system consists mostly of cement-lined cast iron piping and about 10 percent asbestos cement pipes. There are also some steel and polyvinylchloride (PVC) and ductile iron pipes in the system.

Wastewater Service

South Gate's Public Works Department manages a sewer collection system with approximately 120 miles of gravity sewer pipelines with varying diameters ranging from 4 to 27 inches, no pump/lift stations, and about 100 sewer siphons. There are approximately 2,400 manholes and 19,500 service laterals within the City. The sewer collection system primarily discharges into County Sanitation Districts of Los Angeles County (LACSD) facilities for transportation, treatment and disposal. A small percentage of waste collected by the City joins the City of Paramount system and is then discharged into LACSD facilities.

The sewer system is managed by the City's Public Works Department and consists of approximately 120 miles of gravity sewer lines. Nearly all sewer pipelines within the City are made of concrete or vitrified clay. The pipelines range in diameter from 4-inch to 27-inch, with majority 8-inches in diameter. The current sewer system age ranges from 40 years to over 90 years old. Approximately 96 miles of pipeline were relined with cured-in-place piping (CIPP) between 2002 and present. There are approximately 2,400 manholes within the system and no lift stations. Generally, sewer flows within the City flow by gravity from north to south. Approximately 99 percent of local wastewater flows discharge into LACSD facilities for transportation, treatment, and disposal. The remaining one percent of total sewage passes into the City of Paramount system and is then discharged into LACSD facilities

The City of South Gate is located within the service area of the Sanitation District 2 of Los Angeles County. The nearest wastewater treatment plant to South Gate is the Los Coyotes Water Reclamation Plant (WRP) located in Cerritos. The Los Coyotes WRP is located at 16515 Piuma Avenue in the City of Cerritos and occupies 34 acres at the northwest junction of the San Gabriel River (I-605) and the Artesia (SR-91) Freeways. The plant was placed in operation on May 25, 1970, and initially had a capacity of 12.5 million gallons per day (mgd) and consisted of primary treatment and secondary treatment with activated sludge. The Los Coyotes WRP provides primary, secondary and tertiary treatment for 37.5 mgd. The plant serves a population of approximately 370,000 people. Over five mgd of the reclaimed water is reused at over 270 reuse sites. Reuse includes landscape irrigation of schools, golf courses, parks, nurseries, and greenbelts; and industrial use at local companies for carpet dying and concrete mixing. The remainder of the effluent is discharged to the San Gabriel River. Treated wastewater is disinfected with chlorine and conveyed to the Pacific Ocean.[121] The Los Coyotes WRP has a design capacity of 37.5 mgd and currently processes an average flow of 20.36 mgd.

[121] Los Angeles County Sanitation Districts. http://www.lacsd.org/wastewater/wwfacilities/joint_outfall_system_wrp/los_coyotes.asp.

Solid Waste

The City has a Refuse Collection and Recycling Services Franchise Agreement with Waste Management USA Waste of California, Inc., (Waste Management). A majority of solid waste is disposed at either Class III landfills (municipal solid waste facilities), which are facilities for non-hazardous household waste, or unclassified (inert) landfills that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Waste Management operates a transfer station in South Gate and uses specific landfills for residential and commercial/industrial wastes: Bradley Landfill, Downtown Diversions, Inc., El Sobrante Landfill, Nu-Way Live Oak Reclamation, Inc., Southeast Recovery Resource Facility City of Long Beach-Energy Recovery Bureau, and Synagro Regional Composting Facility. The City of South Gate is a member of the Los Angeles Integrated Waste Management Authority a regional agency, also known as LARA, which is a consortium of 16 cities in Los Angeles County. In 2004, the California Integrated Waste Management Board (CIWMB) approved the formation of LARA as a regional agency whose mission is to assist members in meeting and exceeding the 50% waste diversion mandates of State Assembly Bill 939. The City has approved a number of private sector businesses that recycle materials including Interior Removal Specialists, Pacific Coast Metals, Hanson Aggregates, Inc., and the Sanitation Districts South Gate Transfer Station. The City has several programs to divert solid waste from landfills including composting, facility recovery, policy incentives, household hazardous waste management, and public education about recycling and waste reduction.

3.18.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to utilities and service systems if it would:

- Result resulting in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or,

- Have potential for having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years; or,

- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; or,

- 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; or,

- Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

3.18.4 ENVIRONMENTAL IMPACTS

3.18.4.1 Impact Analysis: The project's potential for requiring or resulting in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

There are no existing wastewater treatment plants, electric power plants, telecommunications facilities, or natural gas facilities located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. In addition, the increase in demand for water disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required (refer to the following subsections). As a result, no impacts will occur.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impacts on this issue. As a result, no impacts would occur.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts would occur.

3.18.4.2 Impact Analysis: The project's potential for having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

The City is also planning other water infrastructure improvements in addition to those outlined in this report. With $7.4 million invested over the next 5 years, along with $8.5 million in long-term projects, these CIPs will focus on non-pipeline aspects of the system. CIP projects include meter and valve replacements, inter-tie construction, storm drain upgrades, well rehabilitation, and repairs to water treatment components like the chlorination system. These City programs will operate concurrently with the pipeline improvements. The City is essentially built out, so the incremental demands based on land use change in addition to the new developments do not significantly increase the existing demands in the future scenario. According to the City's water master plan, the 6,919 gpm future demand represents a 5.23 percent increase over the existing demand.

Table 3-21 shows the amount of water that will be consumed by the proposed project. According to Table 3-21, the proposed project is projected to consume 21,771 gallons of water on a daily basis. The current Citywide annual demand is approximately 6,800 acre-feet per year. The proposed project would consume 24.5 acre feet per year This project consumption represents less than 0.4% the total water consumed Citywide on an annual basis. The proposed project would connect to an existing 16 to 24 inch water main located in Atlantic Avenue or an existing 10-inch water line that extends into the site.

Table 3-21
Water Consumption (gals/day)

Use	Unit	Factor	Generation
Warehouse	435,420 sq. ft.	0.05 gallons/sq. ft./day	21,771 gals/day
Total			21,771 gals/day

Source: Blodget Baylosis Environmental Planning

Although some minor increase in the demand for domestic water may occur as a result of the proposed development, the increase would not be significant and adequate water supplies and facilities are available to serve the proposed project. The future water consumption does not take into account the previous water consumption rates related to the former use. Even though the demand for water generated by the proposed project will not exceed City water supplies, the proposed project should incorporate features that aim to reduce water consumption on a larger scale. These features would include xeriscape landscaping and water conserving-plumbing fixtures. These measures are required in all new construction as part of the City's Low Impact Development requirements. As a result, the impacts are considered to be less than significant and no mitigation is required.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact with respect to water consumption. As a result, the impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: The impacts would be less than significant.

3.18.4.3 Impact Analysis: The project's potential for resulting in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Table 3-22 indicates the future wastewater generation in gallons per day. As indicated in Table 3-22, the proposed project is expected to generate 13,062 gallons of effluent on a daily basis. As indicated previously, the Los Coyotes WRP has a design capacity of 37.5 mgd and currently processes an average flow of 20.36 mgd. The proposed project's effluent generation of 13,062 gallons per day will translate into less than 0.1% of the Los Coyote WRP's design capacity of 37.5 MGD which is well under the capacity of the aforementioned WRP. The -proposed project would connect to an existing 8-inch sewer line located in Patata Street that extends to the project site. This sewer line is owned by the City.

Table 3-22
Wastewater (Effluent) Generation (gals/day)

Use	Unit	Factor	Generation
Warehouse	435,420 sq. ft.	0.03 gallons/sq. ft./day	13,062 gals/day
Total			13,062 gals/day

Source: Blodget Baylosis Environmental Planning

As depicted in the table, the proposed project is anticipated to generate an average of 13,062 gallons of waste water per day. This quantity of wastewater will not necessitate the expansion of any waste water treatment capacity. An existing sewer easement crosses through the eastern portion of the site. In addition, the proposed project will connect to this existing sewer line that traverses the site in a northwest to southeast orientation through the eastern portion of the property.

The existing sewer line has sufficient capacity to accommodate the projected flows and no offsite improvements are proposed. Adequate sewage collection and treatment are currently available. Therefore, project implementation will not exceed wastewater treatment requirements. As a result, the potential impacts are

considered to be less than significant.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact related to effluent generation. As a result, the impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: The impacts would be less than significant..

3.18.4.4 Impact Analysis: The project's potential for generating 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.

As indicated in Table 3-23, the proposed project is anticipated to generate 3,888 pounds of solid waste per day.

Table 3-23
Solid Waste Generation (lbs/day)

Use	Unit	Factor	Generation
Warehouse	435,420 sq. ft.	8.93 lbs/1,000/sq. ft./day	3,888 lbs/day
Total			3,888 lbs/day

Source: Blodget Baylosis Environmental Planning

Waste Management contracts with the City of South Gate to provide waste collection service. Waste generated within the City of South Gate is taken to the following facilities: El Sobrante Landfill, Bradley Landfill, or the South Gate transfer station. The El Sobrante Landfill is a Class-III landfill that currently accepts up to 70,000 tons per week. The proposed project is anticipated to generate 3,888 pounds of solid waste per day as shown in Table 3-23. The El Sobrante Landfill Expansion Project, contemplated an increase in landfill disposal capacity to approximately 109 million tons of municipal solid waste. The proposed project's anticipated daily solid waste generation of 1.9 tons per day is not significant and the impacts are considered to be less than significant.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact related to solid waste generation. As a result, the impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: The impacts would be less than significant.

3.18.4.5 Impact Analysis: The project's potential for complying with Federal, State, and local management and reduction statutes and regulations related to solid waste.

The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project's implementation.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact related to this issue.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts would occur.

3.19 WILDFIRE

This section describes the proposed project's impacts with respect to wildfire hazards. This section discusses pertinent regulations and policies with respect to wildfires, describes the potentially significant impacts that could result from implementation of the proposed project, and provides, where appropriate, mitigation measures to address potential impacts.

3.19.1. SCOPE OF ANALYSIS

The City of South Gate, in its capacity as Lead Agency in the review of the proposed project, directed the preparation and circulation of a NOP that indicated the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental issues considered in this analysis correspond to the following included in Appendix G of the CEQA Guidelines:

- The project's potential for being located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan.

- The project's potential for being located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project 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.

- The project's potential for being located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- The project's potential for being located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

3.19.2 ENVIRONMENTAL SETTING

3.19.2.1 Regulatory Setting

There are a number of local agencies involved in the development, implementation, and enforcement of regulations related to wildfire hazards. The primary agencies involved are outlined below.

- *California Department of Forestry and Fire Protection.* The California Department of Forestry and Fire Protection (CAL FIRE) responds to all types of emergencies. The Agency is dedicated to the fire protection and stewardship of over 31 million acres of California's privately-owned wildlands. In addition, CalFire provides varied emergency services in 36 of the State's 58 counties via contracts

with local governments. Preventing wildfires in the State Responsibility Area (SRA) is a vital part of CAL FIRE's mission. While these efforts have occurred since the early days of the Department, CAL FIRE has adapted to the evolving destructive wildfires and succeeded in significantly increasing its efforts in fire prevention. CalFire's Fire Prevention Program consists of multiple activities including wildland pre-fire engineering, vegetation management, fire planning, education and law enforcement. Typical fire prevention projects include brush clearance, prescribed fire, defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, and fire-related law enforcement activities.

- *Los Angeles County Fire Department*. The Los Angeles County Fire Department (LACFD) provides fire protection and first responder emergency medical services to the City of South Gate. There are two fire stations within the City of South Gate in close proximity to the project site. Fire Station 54 is located at 4867 Southern Avenue and is staffed at all times by one captain, one engineer, one firefighter, and three paramedics. This station is located approximately 1.0 miles from the site. Fire Station 57 is located at 5720 Gardendale Street, and is staffed by one captain, one engineer and two firefighters. A battalion chief oversees both fire stations. This station is located approximately 4.1 miles from the project site. In According to the South Gate General Plan, there are 35 fire department personnel distributed over three shifts. The average response time is 4 minutes and 58 seconds for emergency calls, and 7 minutes and 6 seconds for non-emergency calls.

3.19.2.2 Physical Setting

The site was formerly occupied by Armstrong World Industries, Inc. (Armstrong). All of these structural improvements have been demolished. The only remaining structural improvements located wthin the project site includes building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping.[122] The project site has no street frontage and has a single point of ingress and egress that is located at the eastern terminus of Patata Street. Surrounding land uses in the vicinity of the project site are described below:

- *North of the Project Site*. Residential properties are located to the north of the project site. These units are located in the City of Cudahy and extend along both sides of Fostoria Street.[123]

- *South of the Project Site*. Industrial uses are located adjacent to the project site to the south of the Patata Street right-of-way. These uses are located within the City of South Gate.[124]

[122] Nationwide Environmental Title Research, LLC. 2021. Historic Aerials by NETROnline. Website: https://www.historicaerials.com/viewer. Accessed July 28, 2021.

[123] Google Maps. Website accessed on February 22, 2022

[124] Ibid.

- *East of the Project Site*. The Los Angeles River Channel is located to the east of the project site.[125] The Long Beach Freeway (I-710) extends in a north-south orientation approximately 660 feet east of the project site.[126]

- *West of the Project Site*. Various commercial and industrial land uses are located to the west of the project site. Wilcox Avenue is located to the west of the site[127]

The existing unmaintained property could present a fire hazard though there is no natural (fire climax) vegetation present that could pose a wildfire risk.

3.19.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact with respect to wildfire hazards if it would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;

- 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;

- 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; or,

- 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.

3.19.4 ENVIRONMENTAL IMPACTS

3.19.4.1 Impact Analysis: The project's potential for substantially impair an adopted emergency response plan or emergency evacuation plan.

The proposed project involves the construction and operation of a new warehouse and manufacturing facility (refer to Section 2.3) within an urban area of the City of South Gate. The proposed project is not located on any lands that are classified as being located within a high fire hazard area. The proposed project would not involve the closure or alteration of any existing evacuation routes. As a result, no impacts will occur.

[125] Google Maps. Website accessed on February 22, 2022.

[126] Ibid.

[127] Ibid.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impacts related to this issue.

Mitigation Measures: No mitigation is required.

Significance after Mitigation: No impacts would occur.

3.19.4.2 Impact Analysis: The project's potential for being located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project 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.

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the proposed project will replace dilapidated land cover. As a result, no impacts will occur.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact.

Mitigation Measures: No mitigation is required since no impacts were identified.

Significance after Mitigation: No impacts would occur.

3.19.4.3 Impact Analysis: The project's potential for requiring 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.

The project site is not located in an area that is classified as a high fire risk severity, and therefore will not require the installation of specialized infrastructure such *as fire roads, fuel breaks, or emergency water sources*. As a result, no impacts will occur.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact.

Mitigation Measures: No mitigation is required since no impacts were identified.

Significance after Mitigation: No impacts would occur.

3.19.4.4 Impact Analysis: The project's potential for exposing 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.

There is no risk from wildfire within the project site or the surrounding area given the project site's distance

from any area that may be subject to a wildfire event. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no impacts will occur.

Conclusions: The analysis determined that the proposed project's implementation would not result in any impact.

Mitigation Measures: No mitigation is required since no impacts were identified.

Significance after Mitigation: No impacts would occur.

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SECTION 4.0 MANDATORY CEQA CONSIDERATIONS

This chapter contains analysis of the CEQA mandated discussions requiring the consideration of a range of issues extending beyond analysis of project-specific impacts to individual resource areas. The topics included within this chapter include:

- Growth Inducing Effects (CEQA Guidelines §15126.2(d));
- Significant Irreversible Environmental Changes (CEQA Guidelines §15126.2(c));
- Significant and Unavoidable Adverse Impacts (CEQA Guidelines §15126.2(b)); and,
- Cumulative Impacts.

4.1 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) discuss a project's potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. This section analyzes such potential growth-inducing impacts, based on criteria suggested in the CEQA Guidelines.

Public Resources Code Section 21100(a) (5) requires that the growth-inducing impacts of a project be addressed in the EIR. According to CEQA, a project may be growth-inducing if it directly or indirectly fosters economic or population growth, or the construction of additional housing, removes obstacles to growth, taxes community service facilities, or encourages or facilitates other activities that cause significant environmental effects.

Pursuant to State CEQA Guidelines §15126.2(d), an EIR must "discuss the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment…". The purpose of this section is to evaluate the potential for growth-inducing effects of the proposed project. A project would directly induce growth if it would remove growth control barriers to growth, such as a change to a jurisdiction's General Plan and Zoning Ordinance that would allow increased development. While the CEQA Guidelines require a discussion of growth inducement, the Guidelines do not require speculation as to exactly when and where growth may or may not occur, and what form that growth may take. In this current case, the development that is proposed is a new manufacturing and warehouse facility (described herein in Section 2.3) that will replace what remains of the former Armstrong manufacturing plant on an infill site that is surrounded by development. Growth-inducing impacts are often associated with the provision of urban services to an undeveloped or rural area, such as utilities, improved roadways, and expanded public services. Those variables that typically contribute to growth-inducing impacts include the following:

- new development in an area presently undeveloped and economic factors which may influence development;

- the extension of roadways and other transportation facilities;
- the extension of infrastructure and other improvements;
- major off-site public projects (treatment plants, etc.);
- the removal of housing requiring replacement housing elsewhere;
- additional population growth leading to increased demand for goods and services; and,
- short-term growth inducing impacts related to the project's construction.

The potential growth inducing issues and the project's contribution are summarized in Table 4-1. As indicated in Table 4-1, no growth-inducing impacts from the proposed project are anticipated.

Table 4-1
Potential Growth-Inducing Impacts

Factor Contributing to Growth Inducement	Project's Potential Contribution	Basis for Determination
New development in an area presently undeveloped and economic factors which may influence development.	The proposed project will promote revitalization of underutilized parcels that are presently occupied by the former Armstrong manufacturing plant.	The new construction contemplated as part of the proposed project's implementation will be consistent with the City of South Gate General Plan. No adverse growth-inducing impacts are anticipated.
Extension of roadways and other transportation facilities.	The proposed project contemplates improvements to the surrounding streets to facilitate access to the project site.	The roadway and intersection improvements are designed to improve access to the project site. No adverse growth-inducing impacts are anticipated.
Extension of infrastructure and other improvements.	No new water, sewer, and other critical infrastructure improvements are anticipated as part of the proposed project's implementation. The new connections would serve the proposed project only.	No adverse growth-inducing impacts are anticipated since all of the project-related infrastructure will be designed to serve the project site only.
Major off-site public projects (treatment plants, etc.).	No major facilities are proposed at this time.	No adverse growth-inducing impacts are anticipated.
Removal of housing requiring replacement housing elsewhere.	The proposed project site will not involve the removal of any housing units.	The proposed use is consistent with the General Plan in terms of land use. No housing replacement will be required as part of the proposed project's implementation.
Additional population growth leading to increased demand for goods and services.	The project provides for additional employment-related activities.	The projected employment does not represent a significant adverse impact given the local unemployment rate and the replacement of a former manufacturing plant.
Short-term growth inducing impacts related to the project's construction.	New development anticipated as part of the proposed project's implementation will result in the creation of new construction employment.	Short-term increases in construction employment are not anticipated to result in significant adverse growth-inducing impacts.

Source: Blodgett/Baylosis Environmental Planning. 2022

Section 15126.2(d) of the CEQA Guidelines also require that an EIR "discuss the ways" a project could be growth inducing and to "discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." However, the CEQA Guidelines do not require that an EIR predict where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions may require speculation, which CEQA discourages (see CEQA Guidelines Section 15145). Potential growth inducing issues are discussed in the sections that follow.

Removal of Growth Barriers

Projects that physically remove obstacles to growth, or projects that indirectly induce growth, include those that may be a catalyst for future unrelated development in the area. Several types of projects can induce population growth by removing obstacles that prevent growth, such as the provision of new roads to an area that is underserved or establishing an essential public service. An example of this type of project would be the expansion of a wastewater treatment plant, which would accommodate additional sewer connections within a service area, and therefore, would allow future construction and growth.

The current project site is an infill site and is surrounded on all sides by urban development. In addition, the project site is currently served by utilities and other critical infrastructure. Any new improvements would serve the project site only. As a result, the project and any requisite infrastructure would not be growth inducing. The proposed infrastructure enhancements and upgrades, including water system, sewer system and storm drain systems, would be designed to accommodate the proposed project. This growth is also consist with the City of South Gate General Plan and will not result in an intensification of development of permitted uses within the project site.

Economic Growth

Given the site's current undeveloped and blighted state, economic growth would occur as a result of the proposed project's implementation. The proposed project would require a temporary construction workforce and a permanent operational workforce. For the development site, the temporary workforce would be needed to construct the new building and other improvements. The construction activities would occur over a 14 month period. The proposed project, once operational would employ between 250 to 300 employees. Once the facility is open for business, operational times would occur Monday through Friday with 70 percent of the proposed project's operations taking place during the daytime and afternoon periods and 30 percent occurring during the evening and night.

Employees associated with the project, for both short-term construction and long-term operations, would purchase goods and services in the area. However, any secondary increase in employment associated with meeting these goods and services demands is expected to be accommodated by existing goods and service providers. Based on the amount of existing and planned future commercial and retail services available in and located near the project site, the potential economic growth resulting from the project would be minimal and unlikely to result in any unanticipated, adverse physical impacts to the environment.

Population and Housing Growth

There are no housing units located onsite and the proposed project will not involve the construction of new housing units. The site is zoned for industrial development consistent with that being proposed. As indicated in the previous section, between 250 to 300 new jobs would be created by the proposed project. The City's current unemployment rate in the City is 5.2%. Given the City's and area's current unemployment rates, the future jobs created by the proposed project may be readily filled by the local labor pool.

Overall, the project's employment would foster some economic expansion and population growth. While the project's employees (both short-term construction and long-term operational) would purchase goods and services in the region, any secondary increase in employment associated with meeting these goods and services demands is expected to be accommodated by existing goods and services providers located in the area. While the development would create jobs, a majority of these jobs likely would be filled by residents of the housing units either already built or planned for development in the region. Accordingly, because it is anticipated that most of the development site's future employees already would be living in the area, the project's introduction of new project-related employment opportunities would not induce substantial growth in the area.

4.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the significant irreversible environmental changes that would result from implementation of the proposed project. This issue is specifically concerned with how a project would represent a commitment of certain resources over the project's lifetime or result in irreversible impacts and/or damage that could result from the project's implementation. The implementation of the proposed project would require the long-term commitment of land and natural resources as follows:

- The construction of the proposed project would require the use of water, timber, steel, sand, gravel, and other minerals and natural resources. Although the project would not result in unusual demand for these resources during construction, they nonetheless represent an incremental increase in demand for nonrenewable resources;

- Nonrenewable energy sources such as non-renewable fossil fuels would be used during the project's construction and operation; and

- Heavy machinery would be used during construction, resulting in proportionate air emissions and noise levels. Once the life span of the proposed project on the development site is reached, it is probable that the site would continue to support industrial uses. The large investment of capital resources that would be expended on the proposed project site, infrastructure, and amenities would likely continue beyond the average life span of the project. Consequently, the project would largely commit the project site to industrial (or similar uses) in the foreseeable future.

Construction and implementation of the proposed project would commit energy, labor, and building materials. This commitment of energy, labor, and building materials would be a long-term obligation,

because once the project site has been developed, it is highly unlikely that the land could be returned to a different condition.

4.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This section indicates those significant irreversible environmental changes that would be involved in the approval and subsequent implementation of the proposed project. The environmental analysis contained in Section 3 of this EIR identified potential adverse impacts that may result from the implementation of the proposed project. The following potential significant and unavoidable impacts for those issue areas are considered in this EIR.

- *Aesthetic Impacts*. The analysis determined that the proposed project would not result in any significant adverse aesthetic impacts given that the site is currently blighted and largely covered over in building foundations and unmaintained vegetation. The new development will consist of state-of-the art architectural design.

- *Agricultural and Forestry Impacts.* The analysis determined that there would not be any impacts on this issue since there are no designated farmland and forestry uses within the project site or on the adjacent properties. The project site and the surrounding properties are developed in urban uses.

- *Air Quality Impacts*. The analysis determined that the short-term and long-term air quality impacts would be below thresholds that are less than significant. The daily construction emissions would not anticipated to exceed the SCAQMD significance thresholds. The analysis also indicated that the operational (long-term) emissions will be below the SCAQMD's daily emissions thresholds.

- *Biological Resources Impacts*. The analysis determined that there would be potentially significant impacts on migratory avian species related to tree removal and mitigation was required. The impacts would be less than significant following mitigation. Mitigation has been required to reduce the project's potential impacts related to tree removal impacts and migratory birds.

- *Cultural Resources Impacts*. The analysis determined that there would not be any impacts on historic resources since no such resources have been documented within the project site boundaries. However, resources may be encountered during grading and earth disturbance activities sources and the impact would be potentially significant and mitigation is required. The impacts would be less than significant following mitigation. Mitigation has been required for an archaeologist to be present to monitor the site during the initial removal of asphalt, grubbing, and prior to grading and trenching of the site.

- *Energy Impacts*. The proposed project would comply with the 2019 Title 24 and CALGreen efficiency standards, which would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, water efficient fixtures, photovoltaic panels, as well as green building standards. This which would reduce energy usage by 30 percent compared to the 2016 Title 24 standards for the development site and by 52 percent compared to the 2016 Title 24 standard. As a result, the impacts would be less than significant.

- *Geology Impacts*. Based on the results of the geotechnical consultant's review, field exploration, laboratory testing and geotechnical analysis, the underlying soils do not present a constraint to development (including expansive soils or liquefiable soils) and the proposed development is considered feasible from a geotechnical standpoint. The analysis determined that the proposed project's impacts would be less than significant with adherence to the recommendation outlined in the geotechnical studied prepared for the proposed project by Southern California Geotechnical.

- *Greenhouse Gas Emissions*. The analysis determined that the proposed project's GHG impacts would be less than significant with adherence the low impact development (LID) requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) and compliance to Transportation Demand Management (TDM) requirements.

- *Hazards and Hazardous Materials Impacts*. The analysis indicated that the project's implementation would not result in any significant adverse impacts with the implementation of the required mitigation. The mitigation would include completing the onsite remediation pursuant to DTSC requirements.

- *Hydrology and Water Quality Impacts*. The analysis determined that adherence to the construction BMPs identified in the Low Impact Development (LID), will reduce potential construction related impacts to levels that are less than significant. Furthermore, the implementation of the proposed project will not result in a violation in water quality standards or discharge requirements since the project Applicant will be required to implement the construction and operational Best Management Practices (BMPs) identified in the mandatory LID plan. As a result, the potential impacts are considered to be less than significant.

- *Land Use Impacts*. The project's potential for physically dividing an established community. Conclusions: The analysis determined that the proposed project would be confined to the current property and, as a result, the project would not divide an existing community. The proposed project would not result in a significant environmental impact related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- *Mineral Resources Impacts*. The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site. The analysis determined that the proposed project's implementation would not result in any impact related to mineral extraction activities. As a result, no impacts would occur.

- *Noise Impacts*. The analysis determined that during construction phases, mitigation would be required to reduce construction noise levels. The analysis determined that the proposed project's operational noise impacts would require mitigation to address roof top equipment and after hour truck movements along the north side of the building.

- *Population and Housing Impacts*. The analysis determined that the proposed project's implementation would not result in any housing displacement or growth-inducing impacts. As a result, no impacts would occur.

- *Public Service Impacts*. Under CEQA, service demand in and of itself does not constitute an environmental impact unless such demand causes a physical change to the environment. The increase in occupants (250 to 300 new employees) on the site is not anticipated to result in an increase in demand for fire protection, law enforcement, or other public services to trigger the need to physically construct new fire protection facilities given that the new facility would replace an older obsolete plant facility. As a condition of City approval, the development project would be required to meet all access, water, and fire protection system requirements, per the Building Code, and the California Fire Code as well as all other applicable City Codes.

- *Transportation Impacts*. The analysis determined that the proposed project's implementation would not result in any significant traffic impacts with adherence to the recommended mitigation. Mitigation measures are recommended in order to ensure that the project does not conflict with a program plan, ordinance or policy addressing the circulation system:

- *Tribal Resources*. Based on the results of the records searches, archival research, tribal correspondence, and the pedestrian survey, no impacts on tribal cultural resources would result. As a result, no impacts would occur.

- *Utilities Impacts*. The demand for water generated by the proposed project will not exceed City water supplies, the proposed project should incorporate features that aim to reduce water consumption on a larger scale including xeriscape landscaping and water conserving-plumbing fixtures. The proposed project's wastewater generation will not necessitate the expansion of any waste water treatment capacity. Finally, the proposed project's anticipated daily solid waste generation per day is not significant. The analysis determined that the proposed project's implementation would not result in any significant impacts on utilities.

- *Wildfire Impacts*. There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the proposed project will replace dilapidated land cover. As a result, no impacts will occur.

4.4 CUMULATIVE IMPACTS

CEQA requires that an EIR also consider the cumulative impacts of the proposed project in conjunction with other related projects in the area. The related projects are defined as two or more individual effects which, when considered together, are considerable, compound or increase environmental effects. The CEQA Guidelines provide two options for developing assumptions for the analysis of cumulative impacts.[128] The first option is a listing of development projects that includes a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control

[128] State of California. *Title 14. California Code of Regulations. Chapter 9. Guidelines for the Implementation of the California Environmental Quality Act, §15126.6.*

of the Lead Agency. Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. As set forth in the *CEQA Guidelines* Section 15355,

> (a) The individual effects may include changes resulting from a single project or a number of separate projects.
>
> (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

As indicated previously, the CEQA Guidelines Section 15130(b) requires that an EIR employ either:

- The *List Approach* entails listing past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

- *The Projection Approach* uses a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For purposes of this EIR's cumulative impact analysis, the "list approach" was used.

Related Projects

The cumulative project list identified on the following page was provided by the cities of South Gate and Cudahy. Cumulative projects within approximately a one-half mile radius were taken into consideration for the project completion year conditions. This radius was selected by City staff from both Cudahy and South Gate due to the area that would be most impacted by future cumulative traffic and the attendant traffic impacts. Based upon the information provided by the City of South Gate and the City of Cudahy, the cumulative projects are listed in Table 4-2. Exhibit 4-1 illustrates the locations of the related projects.

Table 4-2
Cumulative (Related) Projects

Map Ref. (Ex 4-1)	Project Address	Project Description
1	4827 Santa Ana St, Cudahy	New 5-unit multi-family residential
2	4935-37 Santa Ana St, Cudahy	New 6-unit multi-family residential,demo existing
3	7919 Wilcox Ave, Cudahy	New 9-unit multi-family residential
4	4938-4932 Clara St, Cudahy	New 30-unit multi-family residential
5	4942-4938 Clara St, Cudahy	New 44-unit multi-family residential
6	5111 Elizabeth St, Cudahy	New 6-unit multi-family residential
7	5112 Santa Ana St, Cudahy	New 8-unit multi-family residential
8	5210 Santa Ana St, Cudahy	New 8-unit multi-family residential
9	9350 Rayo Ave, South Gate	Off-site parking facility, Amazon DAX7 Distribution Facility
10	9208 Atlantic Ave, South Gate	Amazon parking lot

South Gate Gateway District Specific Plan

In addition to the cumulative projects identified in Table 4-2 and shown in Exhibit 4-1, the City of South Gate has been involved in the preparation of the South Gate Gateway District Specific Plan. The Specific Plan's geographic planning area is located to the south of the proposed project's site. The Gateway District Specific Plan applies to a geographic area consisting of approximately 59 acres. This area is bounded by Atlantic Avenue to the west, Patata Street to the north, and Firestone Boulevard to the south, and includes parcels south of Firestone Boulevard extending to Branyon Avenue.[129]

[129] City of South Gate. *Gateway District Specific Plan* [Public Review Draft], February 7, 2019.

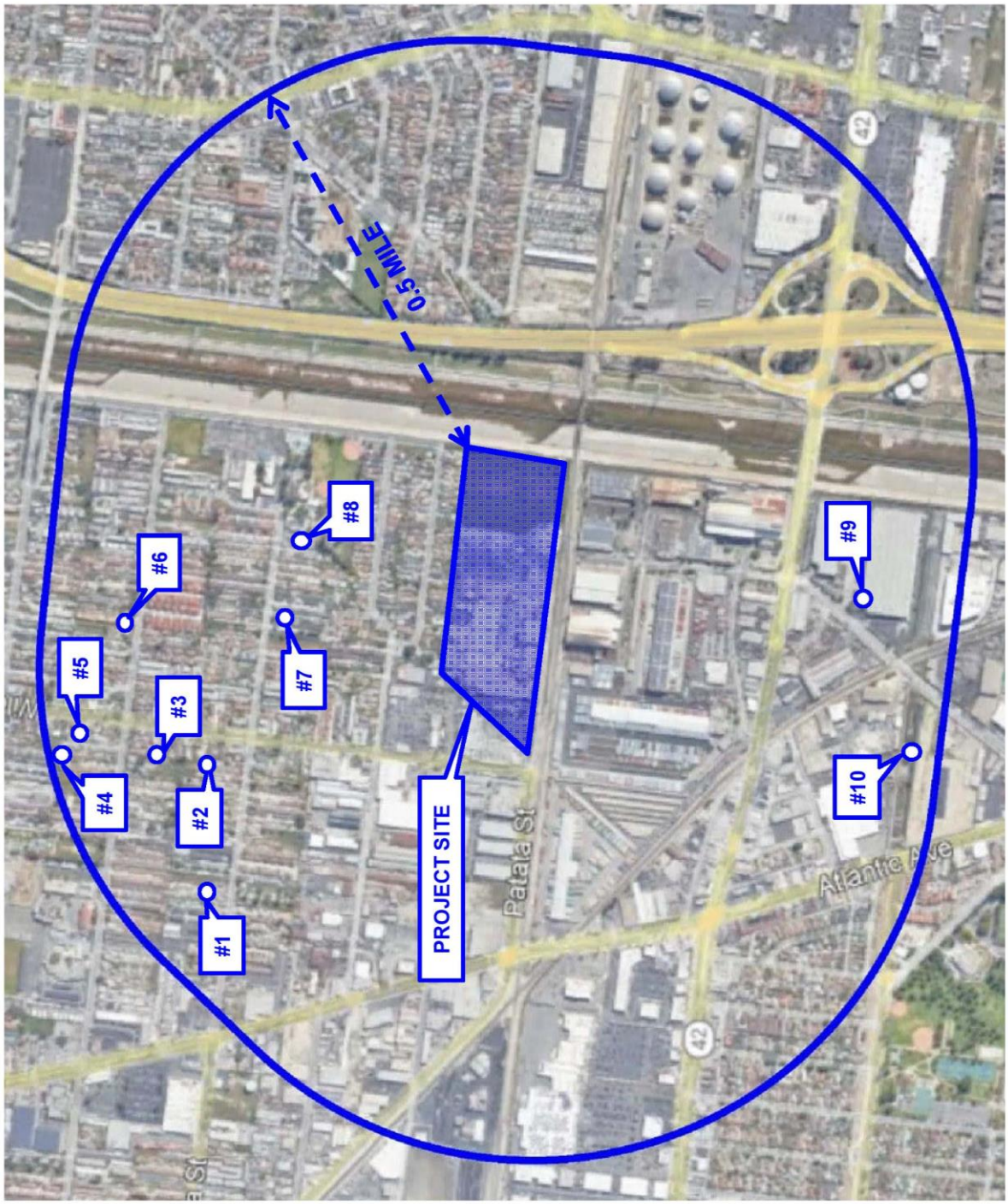

EXHIBIT 4-1
LOCATION OF CUMULATIVE (RELATED) PROJECTS

Source: Blodgett Baylosis Environmental Planning

The Gateway District Specific Plan outlines the regulatory, design, implementation, financing, and infrastructure framework to leverage transit-related investment in the District so as to create a mixed-use transit-oriented district (TOD) surrounding the future light rail transit (LRT) station that is proposed within the planning area. Finally, the Specific Plan implements the City's General Plan vision for the geographic area that is governed by the Specific Plan and relies on the Zoning Code as the key regulatory tool for its implementation.[130] All future development and improvements within the planning area governed by the Specific Plan will be required to meet or conform to the following requirements:

- Future development within the planning area must support mixed-use transit-oriented redevelopment and infill development.

- Future development within the planning area must be developed with uses and densities at intensities that support transit ridership, to reduce development pressure on adjacent existing residential areas.

- Future development within the planning area must establish a cohesive public realm linking the future LRT Station to bus stops along Firestone Boulevard and Atlantic Avenue (this may include public plazas, transit plazas, pedestrian connections, or other similar public/semi-public spaces).

- Future development within the planning area will be required to provide a combination of common outdoor and private open space, consistent with Zoning Code Section 11.23.050.

- Future development within the planning area will be required to enhance the existing and future public realm with street furniture, bicycle facilities, and pedestrian access to the LRT Station and District development.

- Future development must support transit-oriented light industrial, office, and flex uses to provide a range of employment options in proximity to transit and housing.

- Future development within the planning area must support establishment of outdoor retail activity, such as sidewalk cafes, farmers markets, and programmed events, to activate the District.[131]

The City of South Gate General Plan designates the planning area as "Gateway District, Sub-area 2". The General Plan vision and policies identify Sub-area 2 as a potential multi-modal station ("South Gate Station"), that should become a dense transit village that would include new residential and/or office uses. This area is envisioned in the General Plan as a major destination for the City, which should be designed to support a high-level of pedestrian activity. Light Industrial/Flex uses are also envisioned to serve as a transition between the transit village and industrial areas located to the east of the planning area.[132] It is important to note that the land uses and development envisioned as part of the Specific Plan's implementation are consistent with the goals and polices of Gateway District designation of the City of South Gate General Plan. The land use and development regulations of the Zoning Code are also applicable to all

[130] City of South Gate. *Gateway District Specific Plan* [Public Review Draft], February 7, 2019.

[131] Ibid.

[132] Ibid..

development activities governed by the Specific Plan. In other words, the land uses and development envisioned under the Specific Plan corresponds to that envisioned under both the City of South Gate General Plan and Zoning Ordinance.

The Specific Plan's land use plan is consistent with the City of South Gate General Plan. The Specific Plan's implementation would result in a *reduction* of 7.67 acres of industrial uses with an *addition* of 4.69 acres of open space and 1.69 acres of parking. The most significant change in the land uses, and the centerpiece of the Specific Plan's land use policy, will be the new light rail transit (LRT) and the potential for 1,369 residential units that would be located around the new LRT station. Finally, the Specific Plan calls for the transitioning of the older obsolete industrial development to be replaced with commercial/retail mixed use and hotel development.[133] The City is currently overseeing the preparation of an EIR for the proposed Gateway District Specific Plan.

Overview of Cumulative Impacts

As indicated in Table 4-2 and Exhibit 4-1, eight of the identified Related Projects (#1 through #8) are residential in nature and are located in the City of Cudahy. The only related projects located in the City of South Gate is the proposed Amazon facility and remote parking area (Related Projects #9 and #10). The potential for projects to have a cumulative impact depends on both their geographic location as well as the timing of development. The geographic area affected by cumulative projects will vary depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise, whereas the area affected by a project's air emissions generally includes the local South Coast Air Basin. The timing of the future projects is likely to fluctuate due to schedule changes or other unknown factors. The proposed project will not result in any new residential development, and as a result, no direct increase in population or housing inventory will result from the proposed project's implementation. The proposed project will result in an increase in the local employment levels. The projected employment is estimated to be between 250 and 300 new jobs. The cumulative impacts related to the other issues evaluated in this EIR are summarized below:

- *Cumulative Aesthetic Impacts*. No potential cumulative aesthetic impacts are anticipated to result from the proposed project's implementation. The potential cumulative environmental effects for aesthetic impacts are generally site specific. None of the related projects are located adjacent or are visually close to the proposed project site. In addition, all of the related project's will involve the removal of existing and older visually substandard uses. More importantly, none of the related project sites can be seen from the project site. As a result, no cumulative aesthetic impacts are anticipated.

- *Cumulative Agricultural and Forestry Impacts*. No potential cumulative impacts on agriculture or forestry resources are anticipated to result from the proposed project's implementation. None of the related projects are located adjacent to the proposed project site. Furthermore, none of the related project sites are occupied by farmland or forestry land uses. As a result, no cumulative impacts on this issue are anticipated.

[133] City of South Gate. *Gateway District Specific Plan* [Public Review Draft], February 7, 2019.

- *Cumulative Biological Resources Impacts*. No potential cumulative impacts on biological resources are anticipated to result from the proposed project's implementation. In addition, all of the related project sites will involve the development of urbanized sites that are currently developed and, as a result, the future development of these properties will involve the removal of existing on-site improvements. No native or natural habitats are found within any of the related project sites. The removal of mature trees will need to be evaluated on a project-specific basis. As a result, no cumulative impacts on this issue are anticipated.

- *Cumulative Cultural Resources Impacts*. No potential cumulative impacts on cultural resources are anticipated to result from the proposed project's implementation. The potential cumulative environmental effects for cultural resources impacts are typically site specific. None of the related projects are located adjacent to the proposed project site. All of the related project sites have been previously developed and are now occupied with on-site improvements. Grading and ground disturbance has already occurred as part the current site development. However, the historic significance of existing sites may need to be evaluated on a project-specific basis though none of the related projects are currently listed on the State or local historic listing. As a result, no cumulative cultural resources impacts are anticipated.

- *Cumulative Geology Impacts*. No potential cumulative impacts with respect to geology is anticipated to result from the proposed project's implementation. None of the related projects are located adjacent to the proposed project site. All of the related project sites have been previously developed and are now occupied with on-site improvements. Grading and ground disturbance has already occurred as part the current site development. In City will require geotechnical and grading studies to be prepared for the related projects as appropriate and the future contractors will be required to comply with any pertinent requirements. As a result, no cumulative impacts are anticipated.

- *Cumulative Hazards and Hazardous Materials Impacts*. No potential cumulative impacts on hazards and hazardous materials are anticipated to result from the proposed project's implementation. The potential cumulative environmental effects for hazards and hazardous materials impacts are typically site specific. During construction activities, the use, storage, disposal, and transport of hazardous materials could result in unforeseen impacts in the absence of mitigation. The applicants/contractors would be responsible for the demolition and the removal of the above-ground improvements. All construction and operational activities will be required to adhere to all Federal, State, and local regulations related to the proper handling and disposal of hazardous materials such as asbestos and lead containing residue. The elimination of the existing contamination will be a beneficial impact. For these reasons, potential impacts to hazards and hazardous materials are not cumulatively considerable. It is also important to note that the proposed Amazon site (Related Project No. 9 and #10) is a designated Cortese site.

- *Cumulative Hydrology and Water Quality Impacts*. No potential cumulative impacts on hydrology and water quality are anticipated to result from the proposed project's implementation. All of the related project sites have been previously developed and are now occupied with on-site improvements. Grading and ground disturbance has already occurred as part the current site development. In City will require hydrology and drainage studies to be prepared for the related

projects as appropriate and the future contractors will be required to comply with any pertinent requirements. The overall drainage characteristics of the affected area will not change with the development of the related projects. None of the related projects are located adjacent to the proposed project site and no cumulative runoff and/or drainage impacts will result. As a result, no cumulative aesthetic impacts are anticipated.

- *Cumulative Land Use Impacts*. No potential cumulative impacts on land use and development are anticipated to result from the proposed project's implementation. The potential cumulative environmental effects for land use impacts are typically site specific. The eight related projects located in Cudahy (Related Projects #1 through #8) would be residential in nature. None of the related projects will divide an established community. The land use entitlements for these related projects will be governed by the City of Cudahy. The South Gate project (Related Project #9 and #10) will undergo environmental review that will be overseen by the City of South Gate.

- *Cumulative Mineral Resources Impacts*. No potential cumulative impacts on mineral resources are anticipated to result from the proposed project's implementation. The potential cumulative environmental effects for mineral resources impacts are typically site specific if any mineral resource extraction activities are not present. Any requisite well closure or abandonment must occur for the individual projects. All of the related projects are developed in urban uses and are not being used for mineral extraction activities. Furthermore, no such impacts were identified for the proposed project.

- *Cumulative Noise Impacts*. No potential cumulative noise impacts are anticipated to result from the proposed project's implementation. The residential projects (Related Projects #1 through #8) are considered to be noise sensitive receptors. The potential traffic impacts generated by the projects would be incremental though the increased traffic Citywide would not result in a discernable increase in traffic noise. A discernable increase in traffic noise (between 3.0 and 5.0 dBA) typically requires a doubling in traffic volumes. The related project located in South Gate (Related Project #9 and #10) would not impact any sensitive land uses related to its operation. The site is located in a commercial and industrial area.

- *Cumulative Population and Housing Impacts*. No potential cumulative population and housing impacts are anticipated to result from the proposed project's implementation. The potential housing and population impacts will be limited to Related Projects #1 through #8. These related projects will translate into 108 new housing units. All of these additional housing units and the attendant population will be located in the City of Cudahy. No such impacts population and housing impacts were identified for the proposed Patata Street project.

- *Cumulative Public Services Impacts*. No potential cumulative public services impacts are anticipated to result from the proposed project's implementation. The demand for fire, law enforcement, schools, and recreation will be greater for those related projects in Cudahy given their residential nature.

- *Cumulative Wildfire Impacts*. No potential cumulative wildfire impacts are anticipated to result from the proposed project's implementation. None of the related projects will be impact by a potential wildfire. As a result, no cumulative impacts are anticipated.

Cumulative Air Quality Impacts/Greenhouse Gas

The eight related projects located in Cudahy (Related Projects #1 through #8) would be residential in nature. The land use entitlements for these related projects will be governed by the City of Cudahy. The South Gate project (Related Project #9 and #10) will undergo environmental review overseen by the City of South Gate. The related projects will total 108 new housing units and a new Amazon fulfillment facility and parking area. The long-term air quality impacts associated with the proposed project include mobile emissions from vehicular traffic; on-site stationary emissions related to the operation of machinery; and off-site stationary emissions associated with the off-site generation of energy (natural gas and electrical). The analysis of long-term operational impacts summarized in Table 4-3, also used the CalEEMod computer model developed for the SCAQMD. The analysis summarized in Table 4-3 demonstrates that the operational (long-term) emissions will be below the SCAQMD's daily emissions thresholds.

Table 4-3
Estimated Operational Emissions in lbs/day

Emission Source	ROG	NO_2	CO	SO_2	PM_{10}	$PM_{2.5}$
Area-wide (lbs/day)	4.88	--	0.02	0.00	--	--
Energy (lbs/day)	0.11	1.05	0.88	--	0.08	0.08
Mobile (lbs/day)	4.90	5.73	54.90	0.13	13.17	3.57
Total (lbs/day)	**9.89**	**6.78**	**55.8**	**0.13**	**13.25**	**3.65**
Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**

Source: CalEEMod V.2020.4.0

The long-term cumulative air quality impacts would be less than significant.

Cumulative Energy Resources Impacts

The eight related projects located in Cudahy (Related Projects #1 through #8) would be residential in nature. The land use entitlements for these related projects will be governed by the City of Cudahy. The South Gate project (Related Project #9 and #10) will undergo environmental review overseen by the City of South Gate. The anticipated electrical consumption would be 2,630 kWh per day. The anticipated natural gas consumption would be 2,575 cu. ft. per day.

Cumulative Traffic Impacts

The cumulative traffic impact was determined using an ambient growth rate that was applied to the existing traffic volumes. For the project opening year 2024, the ambient growth rate of 1.4% per year is applied to existing traffic data. This annual growth rate that represents traffic increases resulting from regional development growth is derived from "2010 Congestion Management Program for Los Angeles County." and

approved by the City, as shown in the approved scoping agreement, Appendix A. Traffic volumes for the project opening year without project in the AM and PM peak hours are illustrated in Exhibits 18 and 19, respectively. The study intersections maintain acceptable LOS D or better except for the following intersections: #6 Atlantic Ave at Patata St/Salt Lake Ave: LOS E in the PM peak hour #8 Atlantic Ave at Firestone Blvd: LOS E in the AM peak hour #12 Firestone Blvd at Rayo Ave: LOS E in the AM peak hour.

Cumulative Utility Impacts

The eight related projects located in Cudahy (Related Projects #1 through #8) would be residential in nature. The land use entitlements for these related projects will be governed by the City of Cudahy. The South Gate project (Related Project #9 and #10) will undergo environmental review overseen by the City of South Gate. The anticipated water consumption would be 99,000 gallons per day. The anticipated sewage generation would be 66,000 gallons per day. Finally, the anticipated solid waste generation would be 3,009 pounds per day. The El Sobrante Landfill Expansion Project, contemplated an increase in landfill disposal capacity to approximately 109 million tons of municipal solid waste. The related projects in South Gate are projected to generate 1.9 tons per day of solid waste. As a result, the impact is considered to be less than significant.

SECTION 5.0 ANALYSIS OF ALTERNATIVES

5.1 OVERVIEW OF PROJECT ALTERNATIVES

According to CEQA, an EIR must describe a range of reasonable alternatives to the project, or the location of a project, which would attain most of the basic objectives while avoiding significant environmental effects. An EIR need not consider every conceivable alternative. 7 Rather, a reasonable range of alternatives that will foster informed decision-making and public participation should be considered.[134] Case law further defines reasonable alternatives as those that may be feasibly accomplished in a successful manner, considering the economic, environmental, social, and technological factors involved. (*Citizens of Goleta Valley v. Board of Supervisors* 52 Cal.3d 553, 556 [276 Cal. Rptr. 410]). The Guidelines further require that the discussion focus on alternatives capable of avoiding or substantially lessening significant effects of the project. In addition, the *No Project* alternative must be used to compare the impacts of the proposed project with the existing conditions (the No Project Alternative).

According to CEQA, the range of feasible alternatives shall be selected and discussed in a manner to facilitate meaningful public participation and informed decision-making. The No Project Alternative, required by law to be considered in the EIR, must include a description of existing conditions, as well as what would be reasonably 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 (Section 15126.6 (e)(3)(C). For purposes of the analysis herein, the following alternatives are evaluated:

- *No Project Alternative*. This alternative considers a No Project Alternative required pursuant to CEQA. Under this alternative scenario, the conditions that presently exist would remain indefinitely. While this project alternative is not considered to be feasible, it is used to describe the conditions anticipated to occur if the proposed project were not to proceed.

- *Distribution Facility Alternative*. Under this alternative, the 27.19-acre (1,184,396 square feet) project site would be developed as distribution facility. The proposed site plan under this alternative would call for the construction of a new 240,000 square foot building that would be devoted to warehousing and distribution uses. Under this alternative, the building is smaller and more centrally located in the property.

- *Land Use (Residential) Alternative*. Under this alternative, the project site would be developed in a residential land use. Under this development concept, a General Plan Amendment and Zone Change would be required to accommodate the proposed use. This alternative would potentially result in 737 residential housing units.

The description and rational for the selection of the following alternatives are discussed in greater detail in the sections that follow.

[134] State of California. *Title 14. California Code of Regulations. Chapter 9. Guidelines for the Implementation of the California Environmental Quality Act, § 15126.6*. 1998.

5.2 DESCRIPTION OF PROJECT ALTERNATIVES

No Project Alternative

Under CEQA, the "No Project" Alternative assumes that existing conditions or conditions prior to development will remain unchanged. This alternative considers a No Project Alternative required pursuant to CEQA. Under this alternative scenario, the conditions that presently exist would remain indefinitely. The majority of the project site was previously occupied by the former Armstrong World Industries plant with the former improvements having consisted of approximately 239,200 square feet of manufacturing-related floor area. This plant is now closed and there are no operations being conducted at this time. The western portion of the project site was occupied by manufacturing buildings that have since been demolished. The eastern portion of the project site, located next to the Los Angeles River, is vacant and undeveloped. The previous buildings that occupied the project site included a 5,630-square-foot office building, a 216,600-square-foot concrete manufacturing building, and a 16,970-square-foot metal building. The only remaining structural improvements include building foundations, broken concrete and asphalt circulation and parking areas, and some unmaintained lanscaping. An existing operational cellular tower is located in the east-central portion of the site.

Warehouse/Distribution Facility Alternative

Under this alternative, the 27.19-acre (1,184,396 square feet) project site would be developed as distribution facility. The proposed site plan under this alternative would call for the construction of a new 240,000 square foot building that would be largely devoted to warehousing and distribution. The proposed floor area (240,000 square feet) of this Alternative is comparable to that which previously existed (the former Armstrong plant). For purposes of analysis, the lot coverage was assumed to be 200,000 square feet with the remainder (40,000 square feet) consisting of a second level and/or mezzanine. The total floor area would be less than that envisioned for the proposed project because of the greater need for both employee and truck parking. Under this building concept, the potential footprint would be approximately 50% of that contemplated for the proposed project. However, the smaller footprint would likely require the installation of truck loading positions on both the north and south sides of the building. Between 50 to 70 dock high doors were assumed. Key differences between this alternative and the proposed project includes the following:

- This scenario would eliminate the need for the proposed height variance that would be required for the proposed project. The building's height would be 50-feet instead to 60-feet.

- As indicated above, the footprint of the proposed building would be significantly less than that of the proposed project. The smaller footprint would allow the building to be move further away from the homes located to the north of the site.

- The proposed warehouse/distribution use and the smaller building footprint would require fewer parking spaces, while at the same allowing, greater land area for parking and truck maneuvering.

This Alternative would not require a General Plan Amendment or Zone Change.

Residential Land Use Alternative

This alternative was selected because a number of residents attending the community scoping meetings asked why residential development wasn't considered for the proposed project site. These individuals also requested that this Draft EIR consider a residential land use alternative. Under this alternative, the 27.19-acre (1,184,396 square feet) project site would be developed in residential land uses. The proposed site plan under this alternative would call for the area's development in a *Medium-High* General Plan residential land use designation. This land use designation permits a range of residential types including duplexes/triplexes/fourplexes, townhouses/rowhouses, multi-family, parks/plazas/open space and other supporting development. The maximum density ranges from 21 units to 40 units per acre. The maximum permitted building height is 4 stories. With an affordable housing density bonus, the maximum density could be 45 units per acre and the maximum building height would be 5 stories. For purposes of analysis, it is assumed that 30% of the site's area (8.8-acres) would be devoted to common open space, internal circulation,, and other common areas. This would leave, 18.43-acres for the future residential development. Assuming an average density of 40 units per acre called for under the Medium-High land use designation, a total of 737 units would be possible. Key differences between this alternative and the proposed project includes the following:

- This alternative would eliminate the need for the proposed height variance that would be required for the proposed project. The height of the individual building containing the residential units would be three stories or 45 feet.

- The combined footprint of the proposed buildings would be less than that of the proposed project. The smaller footprints of the individual buildings would allow for their "clustering" to maximize open space so the buildings could be located further away from the existing homes located to the north of the site.

- The proposed residential development would provide sufficient tenant and guest parking on-site. No truck traffic would be generated other than that typically associated with residential development.

This Alternative would require a General Plan Amendment and Zone Change to accommodate the proposed residential use.

5.3 ENVIRONMENTAL ANALYSIS OF THE PROJECT ALTERNATIVES

An alternative may be considered environmentally superior to the proposed project, though it may not meet most of the basic objectives required to make the project feasible as defined by the Lead Agency. This section considers the merits of the project alternatives for those issues considered in this EIR.

Aesthetic Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. The impacts of this alternative would be adverse in that the existing blighted character of the site would remain indefinitely. The visual and blighted character of the site would be expected to continue indefinitely into the future.

- *Distribution Facility Alternative*. The impacts of this alternative less than the proposed project given the building's smaller footprint and reduced size. Light and glare impacts would be comparable to the proposed project. The proposed building's footprint would be approximately 50% of that of the proposed

project and the building height would be 50 feet. This alternative is considered to be the *environmental superior* alternative.

- *Residential Development Alternative*. The impacts of this alternative would be potentially less than that of the proposed project since the maximum building height could be three stories or 45 feet.

Agriculture and Forestry Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. No impacts on this issue would occur with the implementation of this alternative. There are no agricultural or forestry uses located on-site of on the adjacent developed properties. The potential impacts would be similar to those of the proposed project.

- *Residential Development Alternative*. No impacts on this issue would occur with the implementation of this alternative. There are no agricultural or forestry uses located on-site of on the adjacent developed properties. The potential impacts would be similar to those of the proposed project.

Air Quality Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. This alternative would result in both short-term and long-term operational emissions. The impacts would be less with those of the proposed project and the other Alternatives (refer to Table 5-1). The difference in emissions is due to the smaller floor area compared to to the proposed project.

- *Residential Development Alternative*. This alternative would result in both short-term and long-term operational emissions. The impacts would be greater than those of the proposed project and the other Alternatives (refer to Table 5-1).

Table 5-1
Estimated Operational Emissions (in lbs./day) for Alternatives

Emission Source	ROG	NO_2	CO	SO_2	PM_{10}	$PM_{2.5}$
No Project Alternative	0.00	0.00	0.00	0.00	0.00	0.00
Distribution Alternative	10.72	7.12	58.66	0.14	14.56	4.01
Residential Alternative	222.89	30.95	556.46	1.25	85.89	7.87
Project	**19.69**	**13.07**	**107.74**	**0.26**	**26.74**	**7.36**
Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**

Source: CalEEMod V.2020.4.0

Biological Resources Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. This alternative would result in potential tree removal impacts similar to that of the proposed project No significant unmitigable adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

- *Residential Development Alternative*. This alternative would result in potential tree removal impacts similar to that of the proposed project. No significant unmitigable adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

Cultural Resources Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. The impacts related to the discovery of archaeological resources would apply to this alternative. No significant unmitigable adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

- *Residential Development Alternative*. The impacts related to the discovery of archaeological resources would apply to this alternative. No significant unmitigable adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

Energy Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. This alternative would result in both electrical and natural gas consumption. The impacts would be less than that of the proposed project but less than that of the residential alternative (refer to Table 5-2).

- *Residential Development Alternative*. This alternative would result in both electrical and natural gas consumption. The impacts would be greater than those of the proposed project and the other Alternatives (refer to Table 5-2).

Table 5-2
Estimated Daily Energy Consumption for Alternatives

Emission Source	Electrical kWH	Natural Gas cu. Ft.
No Project Alternative	--	--
Distribution Alternative	3,156	3,090
Residential Alternative	11,358	8,100
Project	**5,831**	**5,709**

Source: Blodgett Baylosis Environmental Planning

Geology Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.
- *Distribution Facility Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.
- *Residential Development Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

Greenhouse Gas Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.
- *Distribution Facility Alternative*. This project Alternative would result in GHG emissions. The impacts would be less than those of the proposed project and the other Alternatives (refer to Table 5-3).
- *Residential Development Alternative*. This project Alternative would result in GHG emissions. The impacts would be less than those of the proposed project and the other Alternatives (refer to Table 5-3).

Table 5-3
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (Lbs/Day)			
	CO_2	CH_4	N_2O	CO_2E
No Project Alternative	3,746.78	1.05	--	3,773.1
Distribution Alternative	3,686.06	1.19	--	3,715.86
Residential Alternative	0	0.93	--	2,895.27
Proposed Project	**16,843.51**	**1,809.45**	**0.35**	**24,583.14**

Source: CalEEMod V.2020.4.0.

Hazards and Hazardous Materials Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. The ongoing remediation would continue under this project alternative.

- *Distribution Facility Alternative*. The ongoing remediation would continue under this project alternative. The mitigation required for the proposed project would be applicable to this alternative.

- *Residential Development Alternative*. The ongoing remediation would continue under this project alternative. The mitigation required for the proposed project would be applicable to this alternative.

Hydrology and Water Quality Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

- *Residential Development Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

Land Use Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative. Under this alternative scenario, the conditions that presently exist would remain indefinitely.

- *Distribution Facility Alternative*. Under this alternative, the 27.19-acre project site would be developed as distribution facility. The proposed site plan under this alternative would call for the construction of a new 240,000 square foot building that would be largely devoted to warehousing and distribution uses. This alternative would not require either a General Plan Amendment or Zone Change.

- *Residential Development Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. Under this alternative, the project site would be developed in a residential land use. Under this development concept, a General Plan Amendment and Zone Change would be required to accommodate the proposed use. This alternative would potentially result in 737 residential housing units. This alternative would require a General Plan Amendment or Zone Change.

Mineral Resources Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative.* No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

- *Residential Development Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

Noise Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative.* The noise impacts would be similar to that of the proposed project.

- *Residential Development Alternative.* This alternative is considered a noise sensitive receptor. The overall noise impacts would be less than the proposed project and the Distribution facility Alternative due to the absence of truck traffic.

Population and Housing Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative.* No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project. The potential employment would be comparable to that of the proposed project.

- *Residential Development Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. No displacement impacts would occur under this alternative since no housing units are located within the project site. This Alternative would potentially result in the addition of 737 housing units with a corresponding population of 2,948 residents assuming an average household size of 4.0 persons per unit. This additional population would result in a direct impact on public services (police and educational services).

Public Services Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative.* No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

- *Residential Development Alternative.* The demand for public services, fire and emergency services, law enforcement, schools, and recreation would be greater for this alternative compared with the other alternative and the proposed project. Additional fees may be required to offset the proposed project's impact on key public services.

Transportation Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. As indicated in Table 5-4, this alternative would potentially result in 52 AM peak hour trips, 57 PM peak hour trips, and 1,021 daily trips (refer to Table 5-4). Of the total number of trips, approximately 30% of the total project traffic will consist of larger trucks due to the distribution use.

- *Residential Development Alternative*. As indicated in Table 5-4, this alternative would potentially result in 442 AM peak hour trips, 442 PM peak hour trips, and 4,422 daily trips (refer to Table 5-4).

Table 5-4
Estimated Traffic Impacts for Alternatives

Project Alternative	AM Peak Hour	PM Peak Hour	Daily Trips (ADT)
No Project Alternative	--	--	--
Distribution Alternative	52	57	1,021
Residential Alternative	442	442	4,422
Proposed Project	**105**	**112**	**2,002**

Source: Institute of Transportation Engineers, 11th Edition

Utilities Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.

- *Distribution Facility Alternative*. The impacts would be less than that of the proposed project (refer to Table 5-5). This is due to the smaller size of the proposed project alternative compared to the proposed project.

- *Residential Development Alternative*. The impacts would be greater compared with that of the proposed project refer to Table 5-5). The water consumption and wastewater effluent generation rates for residential uses are higher for residential uses compared to nonresidential development.

Table 5-5
Estimated utilities Use for Alternatives

Emission Source	Water (gals/day)	Sewer (gals/day)	Waste (lbs/day)
No Project Alternative	--	--	--
Distribution Alternative	72,000	48,000	2,143
Residential Alternative	172,458	114,972	9,014
Proposed Project	**133,011**	**88,672**	**3,959**

Source: Blodgett Baylosis Environmental Planning

Wildfire Impacts of the Alternatives

The potential impacts of the three project alternatives are summarized below.

- *No Project Alternative*. No impacts on this issue would occur with the implementation of this alternative.
- *Distribution Facility Alternative.* No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.
- *Residential Development Alternative*. No significant adverse impacts on this issue would occur with the implementation of this alternative. The impacts would be comparable with that of the proposed project.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following possible alternative were considered but not carried forward for additional analysis, since they would not accomplish most of the basic objectives of the project and were considered infeasible.

Alternative Site Location

This alternative proposes that the proposed project be constructed on another site within the City of South Gate. Due to the size of the project site (27.19-acres), there are *no vacant sites* within the City that could accommodate the proposed facility. In addition, the selection of another development site in the City would necessitate the removal of the existing on-site improvements along with any attendant displacement impacts. For these reasons, the "Alternative Site" Alternative was rejected from further consideration.

Development Alternative

This alternative was provided by the project architect early in the project's planning design phases. Under this design concept, a total of 22 smaller industrial buildings were identified. Each building would have its own parking area and a single loading position. Each of the buildings would have a total floor area of 15,000 square feet. each building would include a small office consisting of 1,500 square feet. The total floor area of the proposed on-site improvements was 330,000 square feet. This proposed alternative was not selected because such a design lacked sufficient room for circulation. In addition, the costs for providing infrastructure for the individual buildings would be difficult. Finally, the proposed design did not meet the City's development objectives. For these reasons, the "Development Alternative" was rejected from further consideration.

Environmentally Superior Alternative

The term *environmentally superior* refers only to the comparative environmental effects of the proposed project and alternatives. The project objectives, and whether a particular alternative meets the objectives, must also be considered in the evaluation of alternatives. If the environmentally superior alternative is the no project alternative, the EIR also must identify another environmentally superior alternative from among the other alternatives.

The Warehouse/Distribution Facility Alternative was deemed to be the environmentally superior alternative. The alternative calls for a smaller floor area (240,000 square feet) and a smaller lot coverage (200,000 square feet compared to the proposed project. Under this building concept, the potential footprint would be approximately 50% of that contemplated for the proposed project. Between 50 to 70 dock high doors were assumed. Key differences between this alternative and the proposed project includes the following:

- This scenario would eliminate the need for the proposed height variance that would be required for the proposed project. The building's height would be 50-feet instead to 60-feet.

- As indicated above, the footprint of the proposed building would be significantly less than that of the proposed project. The smaller footprint would allow the building to be move further away from the homes located to the north of the site.

- The proposed warehouse/distribution use and the smaller building footprint would require fewer parking spaces, while at the same allowing, greater land area for parking and truck maneuvering.

This Alternative would not require a General Plan Amendment or Zone Change.

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