Draft Environmental Impact Report

SCH No. 2022040177

7400 Slauson Avenue Project

City of Commerce, California

Lead Agency:

City of Commerce

2535 Commerce Way

Commerce, CA 90040

Public Review Draft | April 2023

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City of Commerce, California

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2535 Commerce Way
Commerce, CA 90040

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Lead Agency Discretionary Permits
Plot Plan and Development Plan Review

April 2023

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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AMSL	Above Mean Sea Level
ANSI	American National Standards Institute
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
Apex	Apex Companies, LLC
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
BACM	Best Available Control Measure
BC	Black carbon
BFSA	Brian F. Smith and Associates, Inc.
BER	Business Environmental Risk
BSC	Building Standards Commission
CH2O	Formaldehyde
(C2H4O)2	Acetaldehyde
C2CL4	Perchloroethylene
C2F6	Hexafluoroethane
C2H6	Ethane
C6H6	Benzene
C4H6	1,3-butadiene
C2H3Cl	Vinyl Chloride
CA	California
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen Code	California Green Building Standards Code
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Code
CCR	California Code of Regulations
CCAA	California Clear Air Act
CEC	California Energy Commission

CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERS	California Environmental Reporting System
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CH4	Methane
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
COG	Council of Governments
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
COP21	21st Annual Conference of Parties
CPUC	California Public Utilities Commission
CREC	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
CrVI	Hexavalent chromium
CSU	California State University
CTD	Commerce Transport District
CTP	Clean Truck Program
CUPA	Certified Uniform Program Agency
CY	Cubic Yards
dB	Decibel
dBA	A-weighted Decibels
DMV	Department of Motor Vehicles
DPM	Diesel Particulate Matter
DRRP	Diesel Risk Reduction Plan
DTSC	Department of Toxic Substances Control
EG	Electrical Generation
EIR	Environmental Impact Report
EMFAC	Emission Factor Model
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EVCS	Electronic Vehicle Charging Station
F	Fahrenheit
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise

FTA	Federal Transit Association
FYI	For Your Information
GCC	Global Climate Change
Gg	Gigagrams
GHG	Greenhouse Gas
GWP	Global Warming Potential
H2O	Water Vapor
H2S	Hydrogen Sulfide
HAZNET	Hazardous Waste Information System
HDT	Heavy Duty Trucks
HFCs	Hydrofluorocarbons
HHDT	Heavy Heavy Duty Trucks
HHMD	Health Hazardous Material Division
HMS	Hazardous Mapping System
HMTA	Hazardous Materials Transportation Act
HMTAUSA	Hazardous Materials Transportation Uniform Safety Act
Hp	horsepower
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Condition
HSC	Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments
HWCL	Hazardous Waste Control Law
HWTS	Hazardous Waste Transporter System
I	Interstate
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ISO	Independent System Operator
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITE	Institute of Transportation Engineers
kg	kilogram
kBTU	kilo-British thermal units
kWh	kilowatt-hour

LACoFD	Los Angeles County Fire Department
LARWQCB	Los Angeles Regional Water Quality Control Board
lbs	pounds
LCA	Life-cycle analysis
LDA	Light duty autos
LDV	Light duty vehicles
LEED	Leadership in Energy and Environmental Design
Leq	equivalent continuous sound level
LEV III	Low Emission Vehicle Program
LHD	light-heavy duty trucks
LOS	Level of Service
LSTs	Localized Significance Thresholds
LUC	Land Use Covenant
M-1	Light Manufacturing
M-2	Heavy Industrial
MATES	Multiple Air Toxics Exposure Study
MCY	Motorcycles
MDR	Medium Density Residential
MDV	Medium Duty Vehicles
MDT	Medium Duty Trucks
METRO	Los Angeles County Metropolitan Transportation Authority
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMTs	million metric tons
MMTCO2e	million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NFA	No further action
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO	Nitric Oxide
NO2	Nitrogen Dioxide
NOX	Nitrogen Oxides
N2	Nitrogen
N2O	Nitrous Oxide

NOP	Notice of Preparation
O2	Oxygen
O3	Ozone
OAL	Office of Administrative Law
OAERP	Operational Area Emergency Response Plan
OBD-II	On-Board Diagnostic
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Assessment
Pb	Lead
PFCs	Perfluorocarbons
PM	Particulate Matter
PM2.5	Fine Particulate Matter (2.5 microns or smaller)
PM10	Fine Particulate Matter (10 microns or smaller)
POLA	Port of Los Angeles
POLB	Port of Long Beach
PRC	Public Resources Code
R2	Light Multiple Residential
R3	Medium Multiple Residential
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	Recognized environmental Conditions
RECLAIM	Regional Clean Air Incentives Market
REL	Reference Exposure Level
REMEL	Reference Mean Emission Level
ROGs	Reactive Organic Gasses
RPS	Renewable Portfolio Standards
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SF/s.f.	square foot or square feet
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Sothern California Association of Governments
SCAQMD	Southern Coast Air Quality Management District

SCCIC	South Central Coastal Information Center
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SCE	Southern California Edison
SF6	Sulfur Hexafluoride
SHMA	Seismic Hazards Mapping Act
SIP	State Implementation Plan
SLF	Sacred Land Files
SLIC	Spills, Leaks, Investigation, and Cleanup
SMP	Soil Management Plan
SO2	Sulfur Dioxide
SO4	Sulfates
SoCalGas	Southern California Gas Company
SoCalGeo	Southern California Geotechnical, Inc.
SOX	Sulfur Oxides
SRA	Source Receptor Area
TAC	Toxic Air Contaminants
TCR	Tribal Cultural Resources
TEA-21	Transportation Equality Act for 21st Century
TIA	Traffic Impact Analysis
TPA	Transit Priority Area
TSCA	Toxic Substance Control Act
UFP	Ultrafine Particles
UNFCCC	United Nations' Framework Convention on Climate Change
U.S.	United States
USGS	United Stated Geological Society
USTs	Underground storage tanks
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
WDR	Water discharge report
YBP	Years before Present
ZE/NZE	Zero- and near-zero emission
ZORI	Zones of Required Investigation

S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

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

The City of Commerce is the Lead Agency under CEQA and is responsible for preparing the EIR for the proposed 7400 Slauson Avenue Project (Project). The City, as the Lead Agency, will review and consider this EIR in its decision whether or not to approve the Project. This EIR has been prepared pursuant to the requirements of CEQA and the Guidelines for the Implementation of CEQA (State CEQA Guidelines) (Title 14, California Code of Regulations, Chapter 3, Section 15000 et seq.) and identifies, analyzes, and mitigates to the extent feasible the potential environmental effects associated with the construction and implementation of the Project.

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

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

S.2 PROJECT SUMMARY

S.2.1 PROJECT LOCATION AND SETTING

The 13.94-acre Project site is located within the southeastern portion of the City of Commerce, California. The City of Commerce is located approximately 6 miles southeast of downtown Los Angeles and is bounded by the City of Montebello to the east, unincorporated East Los Angeles on the north, and the City of Bell Gardens on the south. The Project site is located at 7400 Slauson Avenue, in the City of Commerce, CA 90040 (Assessor's Parcel Number (APN) 6356-016-022), south of Slauson Avenue, west of Greenwood Avenue, and north of the Pacific Electric Railroad.

Under existing conditions, the Project site is currently developed with 249,579 square feet (sf) of existing structures, associated on-site landscaping and parking. Existing structures include one primary 233,260 sf warehouse and office building, and five ancillary structures which range from 694 sf to 6,750 sf. The existing on site facility operates as a warehouse and office building for Gehr Industries.

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

The Project site is surrounded by existing industrial uses to the north, west, and southwest; and residential uses to the east and southeast. Residential uses to the southeast are bisected by an area of industrial which ends at the City boundary on Gage Avenue. The Southern Pacific/Union Pacific Railroad line is immediately south of the Project site. Surrounding land uses to the north, west, and south are designated as Industrial and Medium Density Residential (MDR) to the east across Greenwood Avenue.

S.2.2 PROJECT DESCRIPTION

As described in Section 3.0 of this EIR, the Project involves the redevelopment of the Project site with a modern, 292,029 sf speculative warehouse and office building with 33 loading docks on the south side of the building. A shown in Figure 3-1 in Section 3.0, of the total square footage of the building, the Project would allocate 277,029 sf for warehousing/distribution, 5,000 sf for office uses, and 10,000 sf for office mezzanine. Additionally, the Project would include 55,366 sf of landscaping and surface parking. The Project would require the demolition of the existing buildings totaling 249,597 sf and associated parking. The Project building would be designed, constructed, operated, and/or maintained in accordance with Leadership in Energy and Environmental Design (LEED) standards. The Project building would be designed and built to meet the standard for LEED Silver Certification, or above.

Approval actions required from the City to implement the Project include: (1) Certification of the 7400 Slauson Avenue Project Environmental Impact Report; (2) Adoption of the Mitigation Monitoring and Reporting Program; and (3) Approval of a Plot Plan and Development Plan Review.

S.3 PROJECT ALTERNATIVES

CEQA requires that an EIR identify ways to mitigate or avoid the significant effects that a Project may have on the environment; therefore, in accordance with Section 15126.6 of the State CEQA Guidelines, Section 6.0, *Alternatives*, of this EIR addresses alternatives to the Project. It is typical to consider alternative development scenarios for a Project (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) when identifying potential alternatives to avoid or reduce potential significant impacts resulting from construction or operation of a project to a less than significant level. However, as discussed under Section S.6, below, and as demonstrated through the analysis presented in Section 4.1 through Section 4.9 of this EIR, the Project would not result in any significant and unavoidable impacts. All of the Project's potential impacts are less than significant with implementation of the Project-level mitigation measures.

Alternatives considered and not carried forward for detailed analysis in this EIR include an alternative site and an alternative development project on-site, as further described in Section 6.2 of this EIR. As required by CEQA, Subsection 6.3.1 of this EIR addresses the No Project Alternative - Reuse of Existing Buildings (No Project Alternative). The No Project Alternative represents both types of no project alternatives outlined in the CEQA Guidelines: (1) continuation of development consistent with the existing community development type and zoning designations, and (2) assumes the Project does not proceed. When considering potential alternatives to the Project, the City focused on alternatives that would avoid or reduce the potentially significant impacts. As discussed previously, because the Project's potentially significant impacts, prior to mitigation, are related to construction, the only type of development that would avoid these impacts would involve retention and reuse of the existing buildings and facilities.

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

S.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant

impacts. With respect to the Project, the key issues to be resolved include decisions by the City of Commerce as the Lead Agency, as to:

- Whether this environmental document adequately describes the potential environmental impacts of the Project;
- Whether the recommended mitigation measures should be modified and/or adopted;
- Whether other mitigation measures should be applied to the project besides those identified in the EIR; and

S.5 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by other agencies and the public. This EIR has taken into consideration the comments received from the public and various agencies in response to the Notice of Preparation (NOP) of a Draft EIR. Written comments received during the NOP and scoping period are contained in Subsection 1.4.1, *Draft EIR Scope*. Environmental issues in the comment letters are summarized in Table 1-1 of this EIR, and are addressed in each relevant issue area analyzed in Sections 4.1 through 4.9 of this EIR.

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

S.6 SUMMARY OF ENVIRONMENTAL IMPACTS

Table S-1, *Summary of Impact, Mitigation, and Levels of Impact*, presents a summary of the environmental impacts resulting from the Project, including each of the environmental topics identified in the NOP as having potentially significant impacts. Section 5.0, *Other CEQA Considerations*, of this EIR discusses the environmental topics for which it was determined that no further analysis is required.

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

For each environmental topic, Table S-1 identifies mitigation measures that are applicable to the Project. Project-specific mitigation measures are required to reduce potentially significant impacts for

the following topical issues: Cultural Resources (due to the potential to encounter buried cultural resources), Geology and Soils (due to the potential to encounter buried paleontological resources), Hazards and Hazardous Materials (due to the potential to encounter contaminated soils), and Tribal Cultural Resources (due to the potential to encounter buried tribal cultural resources). These potentially significant impacts are associated with construction activities, not operation of the Project, and would be reduced to a less than significant level with mitigation incorporated. The Project would not result in any significant and unavoidable impacts.

S.7 MITIGATION MONITORING

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

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Table S-1 Summary of Impact, Mitigation, and Levels of Impact

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
4.1 Air Quality			
Threshold a: Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold b: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold c: Would the Project expose receptors to substantial pollutant concentrations?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold d: Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.2 Cultural Resources			
Threshold a: Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Less than Significant Impact	No mitigation is required.	No Impact
Threshold b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Potentially Significant Impact	**MM 4.2-1** Prior to the issuance of a grading permit, the project applicant shall retain an archaeological monitor to be present full-time during all soil disturbing and grading/excavation/trenching activities. Monitor(s) shall be present during grading/excavation/trenching. The archaeological monitor shall be present full-time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources. The principal investigator (PI) may submit a detailed letter to the lead agency during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.	Less than Significant Impact

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		MM 4.2-2 If historic or prehistoric archaeological resources are discovered during grading activities, the archaeological monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the Native American monitor. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery. a) The PI shall evaluate the significance of the resource. The PI shall immediately notify the City of Commerce to discuss the significance determination and shall also submit a letter indicating whether additional mitigation is required. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) that has also been reviewed by the Native American consultant/monitor, and obtain written approval from the City of Commerce to implement that program. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. If the resource is not significant, the PI shall submit a letter to the City of Commerce indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that that no further work is required. **MM 4.2-3** Prior to issuance of an occupancy permit, the PI shall submit to the City of Commerce a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program (with appropriate graphics). For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report. Recording sites with the State of California DPR shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring program. The PI shall submit a revised draft monitoring report to the City of Commerce for approval, including any changes or clarifications requested by the City. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; faunal material is identified as to species; and specialty studies are completed, as appropriate. The cost for curation is the responsibility of the property owner. The PI shall submit the approved final monitoring report to the City of Commerce and any interested parties.	

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
4.3 Energy			
Threshold a: Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold b: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.4 Geology and Soils			
Threshold f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	**MM 4.4-1** Prior to issuance of a grading permit, the Project applicant shall retain a paleontologist to monitor grading activities 5 feet below the surface. Periodic spot checks should be performed from five feet below the surface to a depth of eight feet, to determine the presence of Pleistocene strata or fossils. Once Pleistocene strata are recognized or fossils are discovered, or excavation depths proceed beyond eight feet deep, full-time monitoring for paleontological resources is required. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. If paleontological resources are discovered during grading activities: • Recovered specimens shall be prepared to a point of identification and permanent preservation, including screen-washing sediments to recover small invertebrates and vertebrates if indicated by the results of test sampling. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.	Less than Significant Impact

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		• All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. • All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the Project applicant. • Prior to the issuance of an occupancy permit, the Project applicant shall submit a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the City of Commerce, will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.	
4.5 Greenhouse Gas Emissions			
Threshold a: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold b: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.6 Hazards and Hazardous Materials			
Threshold a: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	**MM 4.6-1** Prior to the issuance of grading permits, the Project Applicant shall prepare an Addendum to the Soil Management Plan (SMP) to address grading and excavation activities specific to the Project. The SMP Addendum shall be submitted for approval by the Los Angeles Regional Water Quality Control Board (LARWQCB). The Project Contractor shall adhere to the protocols and performance standards stipulated in the SMP (Appendix G2 of this EIR). Contractors working at the site shall have the current Hazardous Waste and Emergency Response standard (HAZWOPER) health and safety training and follow all applicable Cal/OSHA regulations for construction safety. A Completion Report shall be prepared at the	Less than Significant Impact

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		conclusion of grading activities. The report shall document field monitoring activities and visual observations made during grading/excavations, as well as soil sampling locations and results. The report shall include a description of the location of impacted soil encountered, actions taken to characterize and mitigate impacts, confirmation soil sampling results, and disposition of any excavated soil. In addition, the report shall include a description of encountered subsurface structures and steps to remove and close such structures. The report shall be reviewed and approved by the City of Commerce Director of Economic Development and Planning, prior to issuance of building permits.	
Threshold b: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant Impact	Mitigation measure MM 4.6-1 would apply.	Less than Significant Impact
Threshold d: Would the Project be located on a site which is included on a list of hazardous materials sites which complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant Impact	Mitigation measure MM 4.6-1 would apply.	Less than Significant Impact
4.7 Noise			
Threshold a: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold b: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.8 Transportation			

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Threshold a: Would the Project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold b: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.9 Tribal Cultural Resources			
Threshold a: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall	Potentially Significant Impact	**MM 4.9-1** Prior to the issuance of a grading permit, the applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with the City during the AB 52 process. The applicant shall coordinate with the Tribe(s) to develop a Tribal Monitoring Agreement(s). A copy of the agreement shall be provided to the City of Commerce Planning Department prior to the issuance of a grading permit. If a significant tribal cultural resource is discovered on the property, ground disturbing activities shall be suspended 50 feet around the resource(s). A representative of the appropriate Native American Tribe(s), the Project Applicant, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented to protect the identified tribal cultural resources from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resources(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the tribal cultural resources in accordance with current professional archeology standards. The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery and shall require that all recovered artifacts undergo basic field analysis and documentation or laboratory analysis, whichever is appropriate. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered tribal cultural resources shall be processed and	Less than Significant Impact

THRESHOLD	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES (MM)	LEVEL OF SIGNIFICANCE AFTER MITIGATION
consider the significance of the resource to a California Native American tribe.		curated according to current professional repository standards. The collection and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the City of Commerce. A final report containing the significance and treatment findings shall be prepared by the archeologist and submitted to the Commerce Planning Department and the appropriate Native American Tribe.	

1.0 INTRODUCTION

This Draft Environmental Impact Report ("Draft EIR" or "EIR") is an informational document that represents the independent judgment of the City of Commerce, acting as the Lead Agency pursuant to the California Environmental Quality Act (CEQA), and evaluates the physical environmental effects that could result from constructing and operating the proposed 7400 Slauson Avenue Project (hereafter, the "Project"). Discretionary actions and other related ministerial actions that are required to construct and operate the Project also are described in this EIR.

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

1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY FOR THIS DRAFT EIR

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

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

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

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

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

The City of Commerce is the Lead Agency for the Project, under whose authority this EIR has been prepared. The Project Applicant proposes to develop one (1) warehouse building on an approximately 13.94-acre property located 7400 Slauson Avenue in the City of Commerce. As the Project site is currently developed, implementation of the Project would include the demolition of existing structures, parking area, and landscaping before construction of the Project. Subsequently, improvements including drive aisles, landscaping, utility infrastructure, water quality basins, exterior lighting, walls/fencing, and signage, would be constructed.

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

- **Plot Plan and Development Plan Review** is proposed to allow for the redevelopment of the Project site with an approximate 292,029 square foot (s.f.) warehouse and office building and associated improvements.

1.3 CEQA PROCESS OVERVIEW

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

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

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

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

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

In accordance with CEQA Guidelines Section 15087, this Draft EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines § 15204(a)). Responses to written comments received during the public review period will be included in the Final EIR ("FEIR"). During the decision-making process, the Project and its design features, objectives, merits, environmental consequences and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by City of Commerce decision-makers. If the FEIR is certified and the Project approved, City of Commerce and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the FEIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

1.4 DRAFT EIR SCOPE, FORMAT, AND CONTENT

1.4.1 DRAFT EIR SCOPE

As a first step in complying with the procedural requirements of CEQA, an Initial Study was prepared by the City of Commerce to preliminarily identify the environmental issue areas that may be adversely

impacted by the Project. Following completion of the Initial Study, the Lead Agency filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP was filed with the State Clearinghouse and distributed to Responsible Agencies, Trustee Agencies, and other interested parties on April 8, 2022, for a 30-day public review period that ended on May 9, 2022. The NOP was distributed for public review to solicit responses to help the City of Commerce identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

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

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

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

Table 1-1 Summary of NOP Comments

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
Comments Received at Scoping Meeting	April 20, 2022	• Request to analyze and mitigate any potential dust generation during construction.	• Subsection 4.1, *Air Quality*
		• Request to evaluate and mitigate any potential construction and operational noise.	• Subsection 4.7, *Noise*
Coalition for Responsible Equitable Economic Development (CREED LA)	May 9, 2022	• Request to include a Health Risk Assessment.	• Subsection 4.1, *Air Quality*
		• Request to consider all reasonably foreseeable uses, including higher intensity uses such as cold storage and subsequent potential use of Transport Refrigeration Units (TRUs).	• Subsection 3.0, *Project Description*, and Subsection 4.1, *Air Quality*

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		• Request to include mitigation measure requiring all construction equipment and operation equipment be zero emission, near-zero emissions, or alternatively fueled.	• Subsection 3.0, *Project Description*, and Subsection 4.1, *Air Quality*
		• Request to include mitigation measure requiring installation of cool roofs and solar canopies on parking lot.	• Subsection 3.0, *Project Description*, and Subsection 4.1, *Air Quality*
		• Request to include mitigation measure requiring large drought-tolerant trees as a buffer between the residences and the warehouse.	• Subsection 3.0, *Project Description*, and Subsection 4.1, *Air Quality*
Los Angeles County Metropolitan Transportation Authority (Metro)	May 6, 2022	• Request to analyze the Project's potential impacts on the Metro bus facilities.	• Subsection 4.8, *Transportation*
		• Request that the EIR identify, and mitigate if needed, all bus stops on streets adjacent to the Project site, and address any temporary or permanent impacts to the service needs of the Metro Bus Operations.	• Subsection 4.8, *Transportation*
		• Recommends that the EIR identify, and mitigate if needed, driveways accessing parking and loading at the Project site, which should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible.	• Subsection 4.8, *Transportation*
		• Recommends that the EIR identify, and mitigate if needed, areas of enhancement which could improve the comfort and safety for transit riders.	• No analysis necessary.
		• Provides contact and requests coordination with Metro Bus Operations Control Special Events Coordinator and Metro's Stops and Zones Department.	• No analysis necessary.
		• Requests the consideration of	• No analysis

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		potential synergies with the Metro Bus system.	necessary.
Los Angeles County Sanitation Districts	May 4, 2022	• Provided information on the jurisdictional boundaries of District No. 2 of the Los Angeles County Sanitization Districts.	• Section 3.0, *Project Description*
		• Provides updated date related to sewerage service, including trunk capacity and wastewater generated.	• Section 3.0, *Project Description*
Native American Heritage Commission (NAHC)	April 15, 2022	• Request that the Draft EIR address AB 52, SB 18, and any other applicable laws, and to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project as early as possible.	• Subsection 4.9, *Tribal Cultural Resources*
South Coast Air Quality Management District (SCAQMD)	May 5, 2022	• Requests to receive the Project's EIR (including technical appendices) when available.	• SCAQMD is included on the mailing list for notices related to this EIR. No analysis necessary.
		• Recommendation to use the SCAQMD's CEQA Air Quality Handbook (1993) when preparing the air quality analysis.	• Subsection 4.1, *Air Quality*, and Subsection 4.5, *Greenhouse Gas Emissions*
		• Recommendation to use the CalEEMod land use emissions software when preparing the air quality analysis.	• Subsection 4.1, *Air Quality*, and Subsection 4.5, *Greenhouse Gas Emissions*
		• Request to identify any potential adverse air quality impacts that could occur from all phases of the Project (including demolition, construction, and operation) and all air pollutant sources related to the Project.	• Subsection 4.1, *Air Quality*, and Subsection 4.5, *Greenhouse Gas Emissions*
		• Request to quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds. Additional request to calculate localized air quality impacts and compare the	• Subsection 4.1, *Air Quality*

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
		results to localized significance thresholds (LSTs).	
		• Request to quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds. Additional request to calculate localized air quality impacts and compare the results to localized significance thresholds (LSTs).	• Subsection 4.1, *Air Quality*, and Subsection 4.8, *Transportation*
		• Request that the City of Commerce perform a mobile source health risk assessment.	• Subsection 4.1, *Air Quality*
		• Request to reference California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* to evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory.	• Subsection 4.1, *Air Quality*
		• Request to assess the Project's diesel particulate matter (DPM) emissions to prevent health impacts in residences near the Project and to assess and disclose the cumulative DPM emissions from other industrial sources in the area.	• Subsection 4.1, *Air Quality*, and Subsection 4.5, *Greenhouse Gas Emissions*
		• In the event that significant adverse air quality impacts are identified, SCAQMD recommends consulting several information sources for mitigation measures.	• Subsection 4.1, *Air Quality*, and Subsection 4.5, *Greenhouse Gas Emissions*
		• SCAQMD lists several mitigation measures for the Lead Agency to consider to reduce air quality impacts from operational mobile and area source emissions.	• Subsection 4.1, *Air Quality*, and Subsection 4.5, *Greenhouse Gas Emissions*
State of California, Department of Transportation, District	May 9, 2022	• Vehicle Miles Traveled (VMT) will be the standard transportation analysis metric in CEQA for land	• Subsection 4.8, *Transportation*

Commenter	Date	Comment(s)	Location in EIR Where Comment(s) Addressed
7 (Caltrans)		use projects after the July 1, 2020 statewide implementation date. Agencies may opt-in prior to that date.	
		• Recommends that the City evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.	• Subsection 4.8, *Transportation*
		• Recommends that the City promote alternative transportation for reduction of GHG emissions.	• Subsection 4.5, *Greenhouse Gas Emissions*, and Subsection 4.8, *Transportation*
		• Provides reminder that any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State Highways will need a Caltrans transportation permit.	• Comment acknowledged; no analysis necessary.

1.4.2 USE OF THIS EIR

This EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines § 15204(a)). During the decision-making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by City of Commerce decision-makers.

1.4.3 CONTENT AND ORGANIZATION OF THIS DRAFT EIR

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

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR's Mitigation Monitoring and Reporting Program (MMRP).

- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City of Commerce, serving as the Lead Agency for this EIR; a brief description of the Project; the purpose of this EIR; applications proposed by the Project Applicant that would require discretionary City approvals; permits and approvals required by other agencies; and an overview of the EIR format.

- **Section 2.0, Environmental Setting**, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was released for public review. The setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to CEQA Guidelines Section 15123. This section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project's lifetime. In addition, the discretionary actions required of the City of Commerce and other government agencies to implement the Project are discussed.

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

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

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

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

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. Two (2) alternatives are presented in Section 6.0.

- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted during preparation of this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

CEQA requires that an EIR contain, at a minimum, certain specified content. 0, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

Table 1-2 Location of CEQA Required Topics

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

1.4.4 INCORPORATION BY REFERENCE

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

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the City of Commerce, Public Works & Development Services Department, 2535 Commerce Way, Commerce, CA 90040, during the City's regular business hours and the City's website at: https://www.ci.commerce.ca.us/city-hall/economic-development-and-planning/planning-environmental-documents-for-review. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

A. Initial Study, Notice of Preparation, and Written Comments on the NOP
B1. Air Quality Impact Assessment
B2. Health Risk Assessment
C. Cultural Resources Assessment
D. Energy Analysis
E1. Geotechnical Investigation
E2. Paleontological Resources Assessment
F. Greenhouse Gas Analysis
G1. Phase I Environmental Site Assessment
G2: Soil Management Plan
H. Noise Impact Analysis
I1. Focused Traffic Assessment
I2. VMT Screening Evaluation

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

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

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

For the Project, the Los Angeles Regional Water Quality Control Plan is responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality. The Native American Heritage Commission (NAHC) is identified as a Trustee Agency for the Project in its capacity to prevent irreparable damage to sacred sites and to prevent interference with Native

American Religion in California. There are no other agencies that are identified as Responsible or Trustee Agencies for the Project.

1.6 AREAS OF CONTROVERSY

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

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

2.0 ENVIRONMENTAL SETTING

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

2.1 REGIONAL SETTING AND LOCATION

The 13.94-acre Project site ("Project site") is located within the southeastern portion of the City of Commerce, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, the City of Commerce is located approximately 6 miles southeast of downtown Los Angeles and is bounded by the City of Montebello to the east, unincorporated East Los Angeles on the north, and the City of Bell Gardens on the south. The City of Commerce is located in southeast Los Angeles County which abuts Kern County to the north; San Bernardino County to the east; Orange County to the south; and Ventura County to the west. As of July 1, 2021, the US Census estimates that the City of Commerce had a population 12,063 (US Census, 2022).

2.2 LOCAL SETTING AND LOCATION

As depicted on Figure 2-2, *Vicinity Map,* the Project site that is the subject of this EIR is located at 7400 Slauson Avenue, in the City of Commerce, CA 90040 (Assessor's Parcel Number (APN) 6356-016-022), south of Slauson Avenue, west of Greenwood Avenue, and north of the Pacific Electric Railroad. Under existing conditions, the Project site is currently developed with 249,579 square feet (sf) of existing structures, associated on-site landscaping and parking. Existing structures include one primary 233,260 sf warehouse and office building, and five ancillary structures which range from 694 sf to 6,750 sf. The existing on site facility operates as a warehouse and office building for Gehr Industries.

The area immediately surrounding the Project Site contains a variety of industrial uses. The census tract containing the Project Site (Census Tract 6037532304) is ranked by the State as being in the 100th percentile for pollution burden which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 99th percentile of communities that are disproportionately burdened by multiple sources of pollution (OEHHA, 2022).

OEHHA's California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0, is a screening methodology that the State uses to identify California communities that are

disproportionately burdened by multiple sources of pollution. The CalEnviroScreen 4.0 indicators for the Project Site's Census Tract are shown below.

Table 2-1 CalEnviroScreen Indicators for Census Tract 6037532304

Indicator	% Burden	Indicator	% Burden
Exposures		**Environmental Effects**	
Ozone:	51	Cleanup Sites	98
PM $_{2.5}$:	87	Groundwater Threats	98
Diesel PM:	96	Hazardous Waste	95
Toxic Releases:	88	Impaired Waters	87
Traffic:	91	Solid Waste	98
Pesticides:	0	**Sensitive Populations**	
Drinking Water:	65	Asthma	58
Lead from Housing:	69	Low Birth Weight	60
		Cardiovascular Disease	80
		Socioeconomic Factors	
		Education	86
		Linguistic Isolation	85
		Poverty	77
		Unemployment	N/A
		Housing Burden	61

Source: (OEHHA, 2022)

Exposure indicators are based on measurements of different types of pollution that people may encounter. Environmental effects indicators are based on the locations of toxic chemicals in or near communities. Sensitive population indicators measure the number of people in a community who may be more severely affected by pollution because of their age or health. Socioeconomic factor indicators are conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects. As indicated in Table 2-1, for the Project Site's Census Tract, the highest environmental exposures (over 85%) are from fine particulate matter ($PM_{2.5}$), diesel particulate matter (DPM), traffic, and toxic releases.

Since the Project site is located within a census tract that receives the highest 25 percent of overall scores in CalEnviroScreen 4.0, the Project site is considered a SB 535 Disadvantaged Community identified by the California Environmental Protection Agency (CalEPA). The State provides California Climate Investment funding appropriated by the State Legislature from the proceeds of the State's Cap-and-Trade Program for investment in disadvantaged communities. The funding is used for programs that reduce emissions of greenhouse gases with at least 25% of the funding going to projects that provide a benefit to disadvantaged communities and at least 10 percent of the funding going to projects located within those communities. (OEHHA, 2022)

2.3 SURROUNDING LAND USES AND DEVELOPMENT

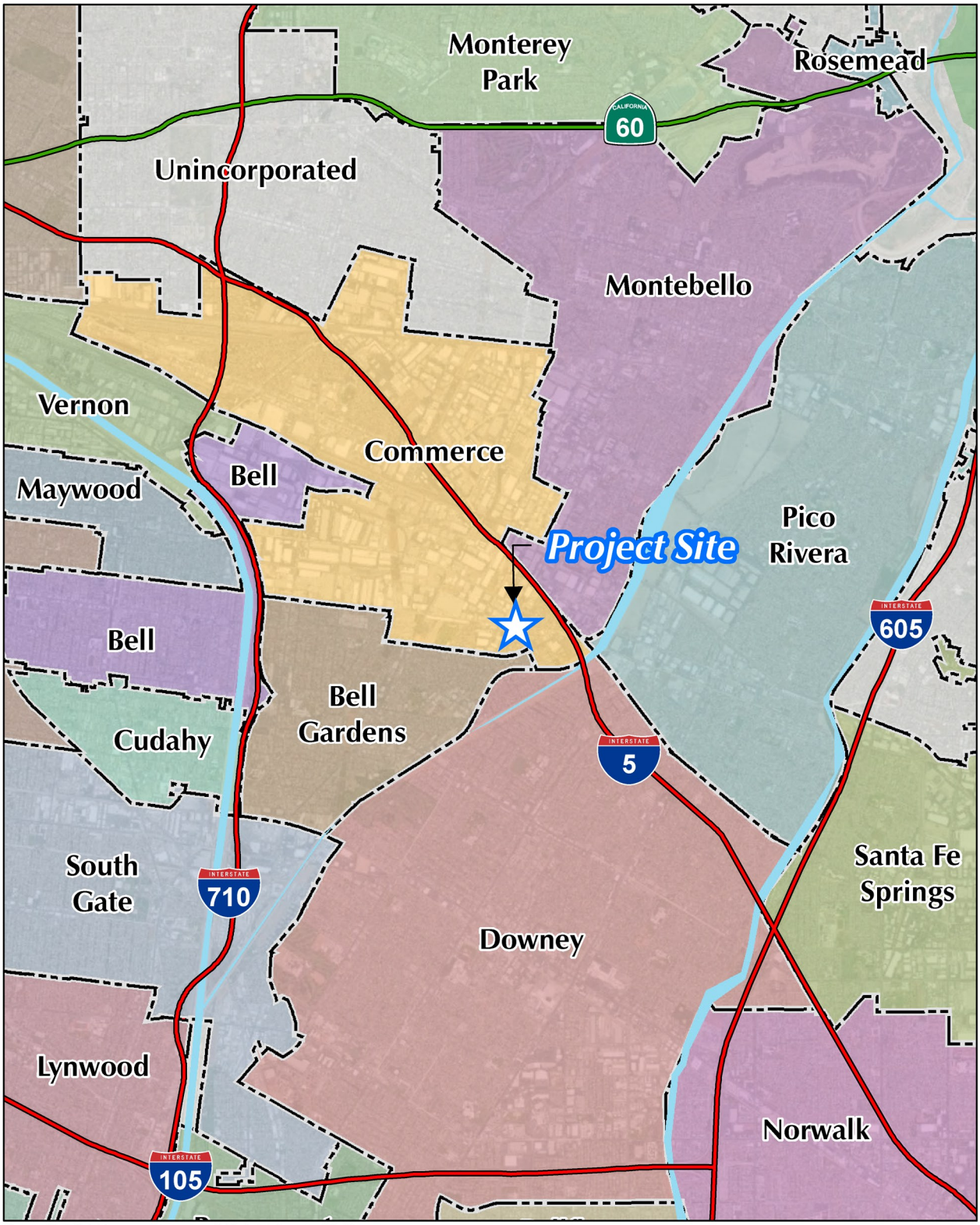
The Project site is surrounded by existing industrial uses to the north, west, and southwest; and residential uses to the east and southeast. Residential uses to the southeast are bisected by an area of industrial which ends at the City boundary on Gage Avenue. The Southern Pacific/Union Pacific Railroad line is immediately south of the Project site. Land uses in the immediate vicinity of the Project site are shown on Figure 2-3, *Surrounding Land Uses and Development,* and described below.

- North: To the north of the Project site are various industrial, warehousing, and manufacturing uses and Interstate 5 (I-5), approximately 0.2 miles from the Project site.

- East: To the east of the Project site are commercial uses at the northeast corner of Greenwood Avenue and East Slauson Avenue and residential uses east of Greenwood Avenue. The I-5 Freeway is located approximately 0.4 miles to the east of the Project site.

- South: To the south of the Project is the Southern Pacific/Union Pacific Railroad line with single and medium density residences further south. The Greenwood Community Church and the Villa Del Rio Convalescent Center are located south of the Project site along East Gage Avenue.

- West: To the west of the Project site are various commercial and industrial buildings, Interstate 710 (I-710), and the Los Angeles River approximately 2 miles from the Project site.

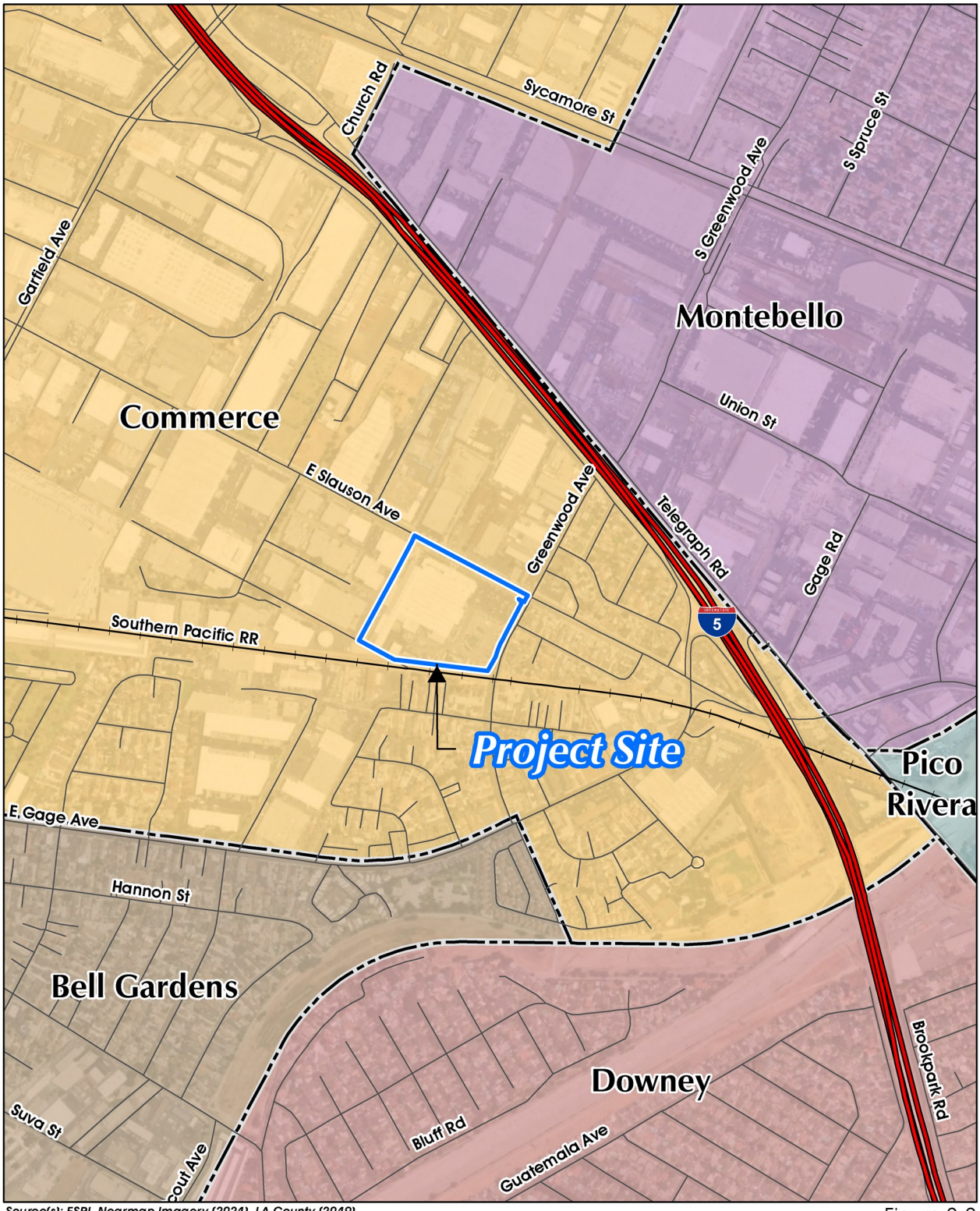


Source(s): ESRI, Nearmap Imagery (2021), LA County (2019)

Figure 2-1

0 1,500 3,000 6,000 Feet

Regional Map



Source(s): ESRI, Nearmap Imagery (2021), LA County (2019)

Figure 2-2

0 250 500 1,000 Feet

Vicinity Map

Source(s): ESRI, Nearmap Imagery (2021), LA County (2019)

Figure 2-3

0 225 450 900 Feet

Surrounding Land Uses and Development

2.4 LOCAL PLANNING CONTEXT

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

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

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. On September 3, 2020, SCAG's Regional Council approved the Connect SoCal plan (also known as the 2020-2045 RTP/SCS). The goals of the 2020-2045 RTP/SCS are to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) Promote conservation of natural and agricultural lands and restoration of habitats. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2020)

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

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

are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its *2016 RTP/SCS*. The 2016 AQMP also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (SCAQMD, 2017c)

The draft 2022 AQMP has been prepared by South Coast AQMD to continue to evaluate current integrated strategies and control measures to meet the NAAQS, particularly the EPA's strengthened ozone standard. These approaches include the use of incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and updated emission inventory methodologies for various source categories. (Urban Crossroads, 2023a, p. 30)

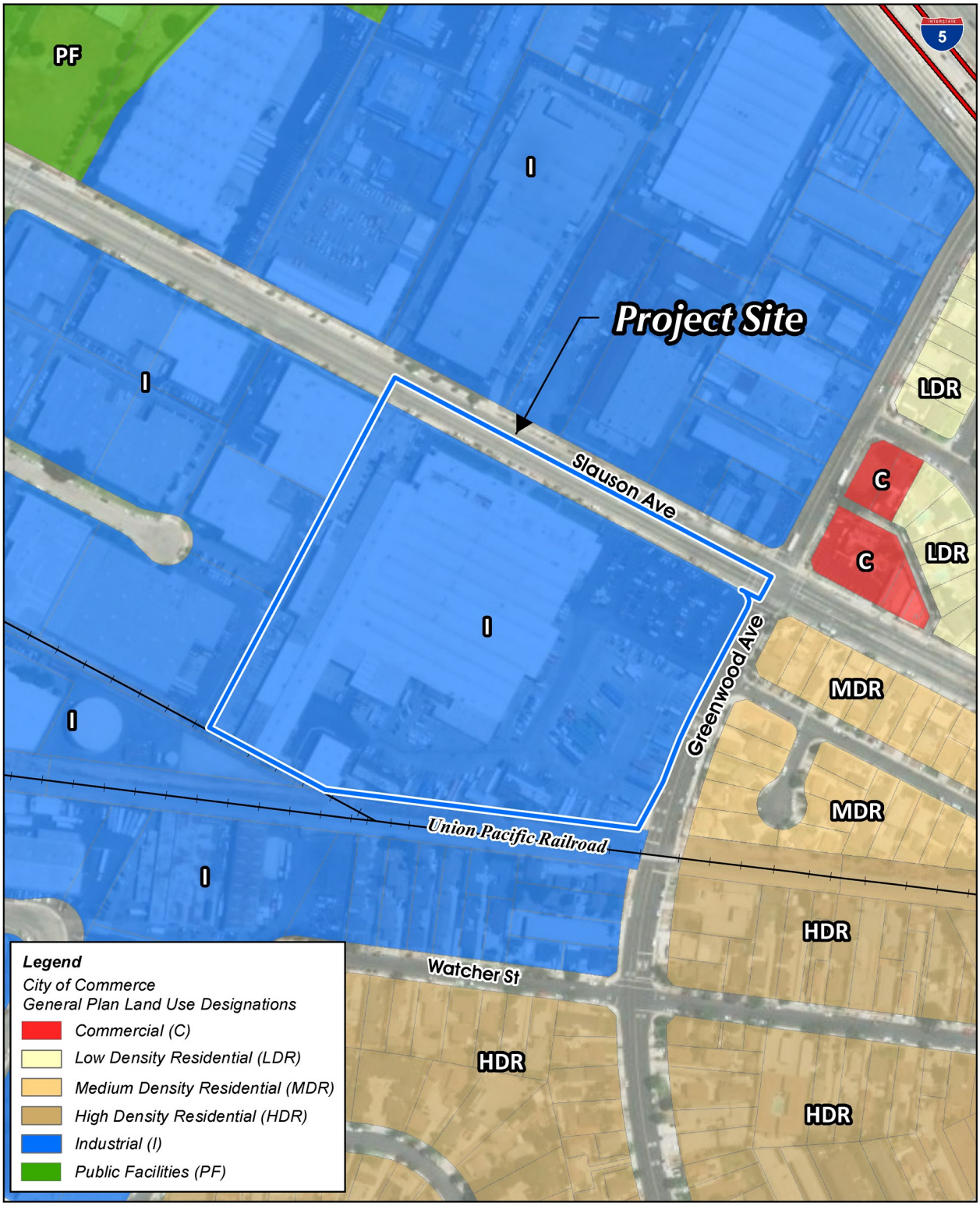
The draft 2022 AQMP was released in August 2022 and public comment closed on October 18, 2022. The SCAQMD Governing Board adopted the draft 2022 AQMP at its December 2, 2022, meeting. The draft 2022 AQMP requires CARB's adoption before submittal for U.S. EPA's final approval, which is expected to occur sometime in 2023. (Urban Crossroads, 2023a, p. 31)

2.4.3 CITY OF COMMERCE GENERAL PLAN

The prevailing planning document for the Project site and its surrounding area is the City of Commerce General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the Project site is located within the City of Commerce. The Project site has a General Plan land use designation of Industrial, which corresponds to Light Manufacturing (M-1) and Heavy Industrial (M-2) zones. The Project site is located at the southeastern corner of the Commerce Park Planning Area which is mostly designated for Industrial and Commercial uses. Land use policy encourages the continued presence of all types of industry throughout the planning area. Surrounding land uses to the north, west, and south are designated as Industrial and Medium Density Residential (MDR) to the east across Greenwood Avenue.

2.4.4 ZONING

As depicted on Figure 2-5, *Existing Zoning Map Designations*, the Project site is zoned M-2. The M-2 zone is intended to provide safeguards and to establish adequate buffer distances between uses that pose potentially adverse public health, safety, and welfare impacts and land uses in adjacent, more restrictive zone districts (City of Commerce, 2000). Permitted uses within M-2 zones are outlined in the Commerce Municipal Code Table 19.11.030A and include transportation, trucking and warehousing, and professional office and institutional uses. Surrounding land uses to the north and west are zoned M-2, Light Manufacturing (M1) and Medium Multiple Residential (R3) to the south, and Light Multiple Residential (R2) to the east.

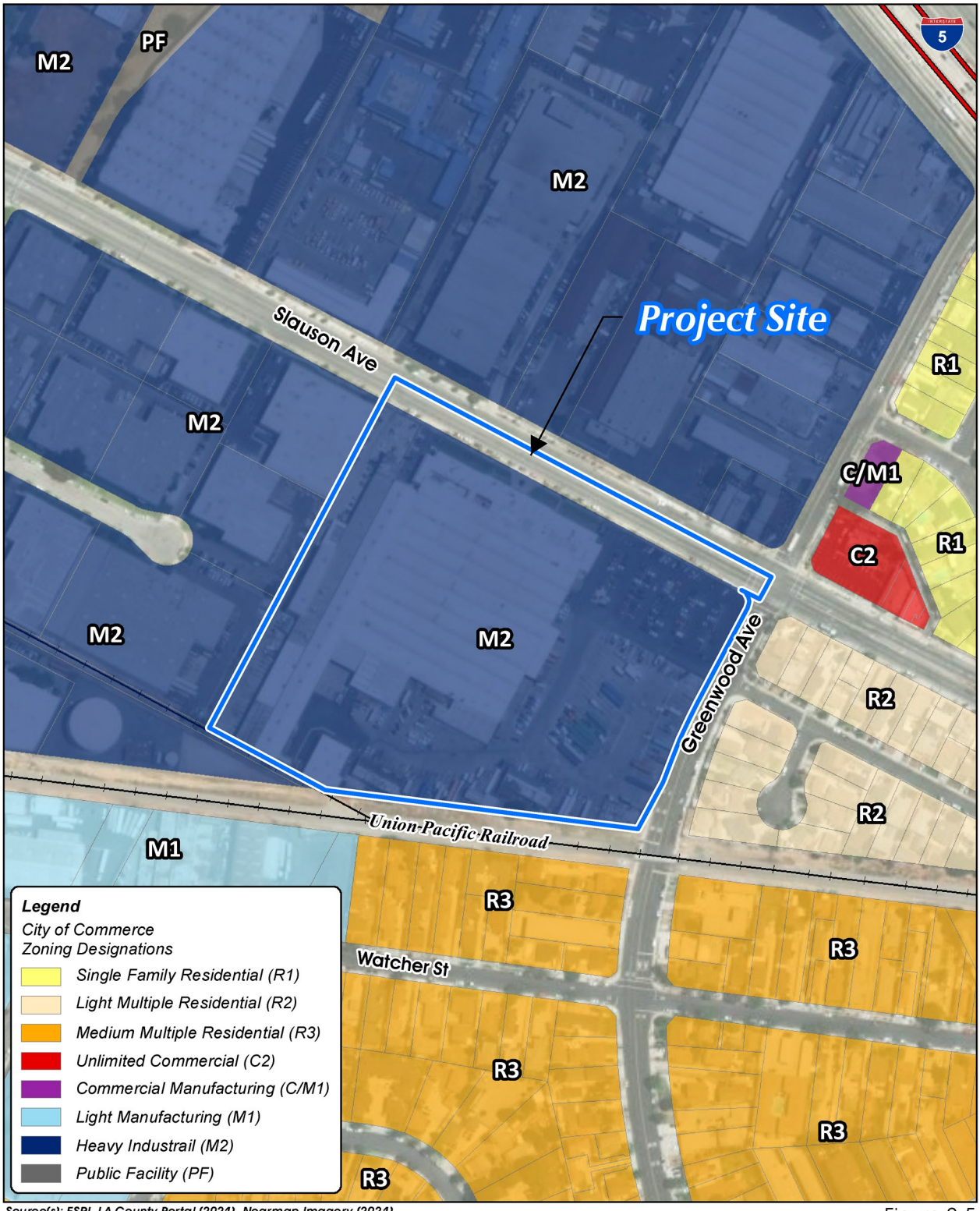


Source(s): ESRI, LA County Portal (2021), Nearmap Imagery (2021), City of Commerce (2009)

Figure 2-4

0 75 150 300 Feet

Existing General Plan Land Use Designations



Source(s): ESRI, LA County Portal (2021), Nearmap Imagery (2021)

Figure 2-5

Existing Zoning Map Designations

2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to CEQA Guidelines Section 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on April 8, 2022. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's current physical conditions and surrounding areas are shown on Figure 2-6, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

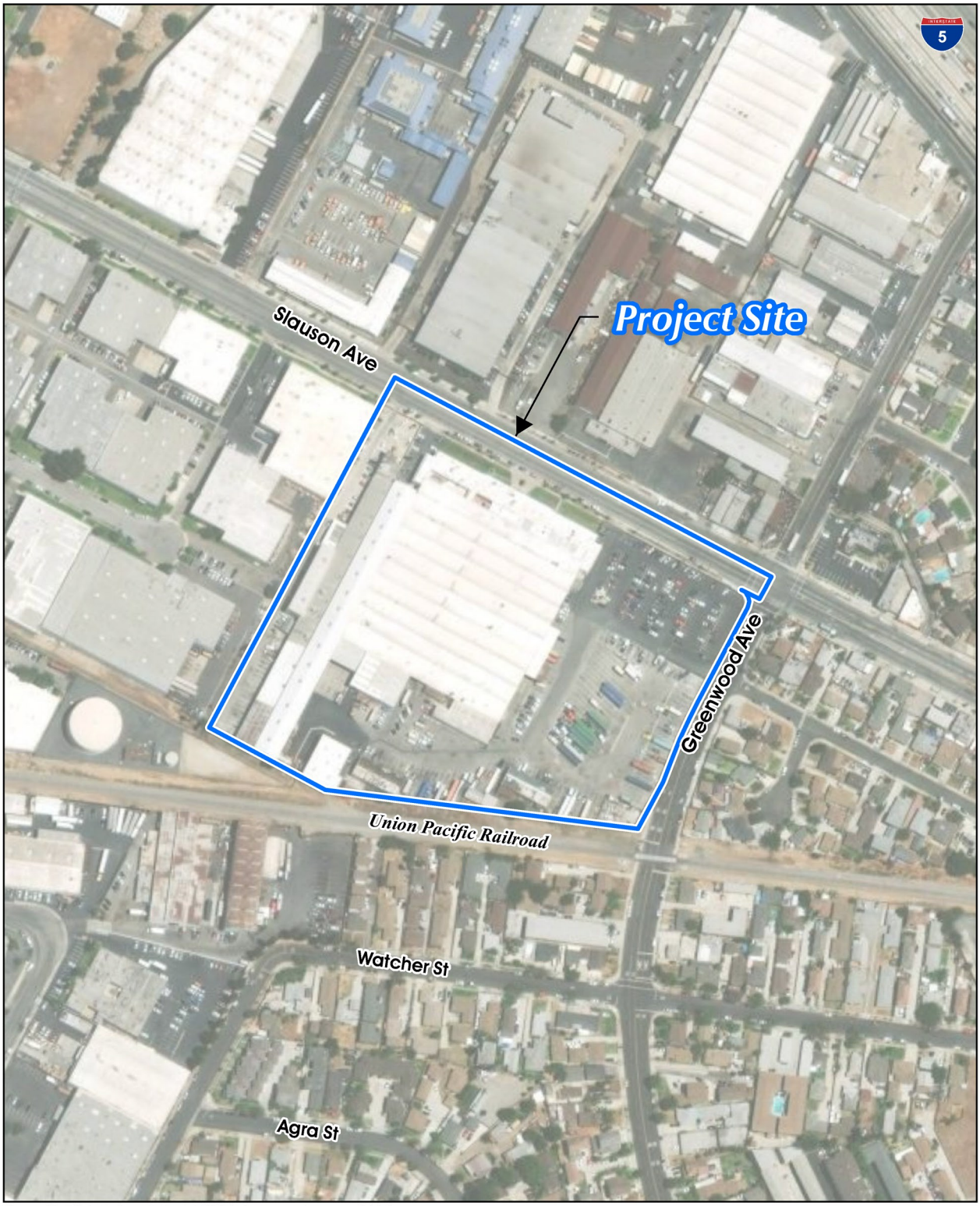
As shown on Figure 2-6, *Aerial Photograph*, the Project site is developed with six buildings comprising a total of 249,579 square feet. Current uses of these six buildings include: an approximately 233,260-square foot building occupied by a self-storage center, office spaces, and warehouse/logistics spaces specialized for packaging electrical equipment; an approximately 6,750 square-foot building that is currently vacant; and four smaller buildings (ranging from 694 to 4,111 square feet) that are currently leased for use by a newspaper printer, equipment repair company, and individual storage spaces. The southeastern corner of the Project site is currently leased to a construction company for equipment storage. The remainder of the Project site consists of parking lot areas and ornamental landscaping.

2.5.2 SITE TOPOGRAPHY

The Project site is located at an elevation of approximately 160 feet above mean sea level (amsl). Regional topography is relatively flat with a gentle slope to the southwest, toward the Los Angeles River, approximately 2 miles west of the Project site.

2.5.3 AIR QUALITY AND CLIMATE

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of South Coast AQMD. The South Coast AQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the South Coast AQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. As previously stated, the Project site is located within the SCAB, a 6,745-square mile subregion of the South Coast AQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County.



Source(s): ESRI, LA County Portal (2021), Nearmap Imagery (2021)

Figure 2-6

0 75 150 300 Feet

Aerial Photograph

The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Los Angeles County portion of the SCAB is bounded by the San Gabriel Mountains to the south and west, the Los Angeles / Kern County border to the north, and the Los Angeles / San Bernardino County border to the east. The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality.

The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F.

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

2.5.4 Cultural Resources

The Project site is generally located in southeastern Los Angeles County in the City of Commerce. The Project site has been previously impacted by agricultural development since 1928 and industrial development since 1951. No natural features that are often associated with prehistoric sites, such as bedrock outcroppings or natural sources of water, are visible on aerial photographs or in the vicinity of the Project site. The Project area is underlain by late Pleistocene to possible early Holocene young alluvium.

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

2.5.5 Geology and Soils

Subsurface exploration of the Project site was conducted at seven boring locations advancing to depths of 7 to ±30 feet below the existing site grades. Pavement was present at all boring locations at depths of approximately 1.5 to 5 inches of asphalt concrete. At five of the seven boring locations, artificial fill soils were located consisting of medium to dense clayey fine sands and silty fine sands with varying medium to coarse sands at depths ranging from approximately 2.5 to 6.5 feet below existing surface. At the remaining two boring locations, possible fill soils were encountered consisting of very loose to very dense silty fine sands with traces of medium sand at depths ranging from approximately 4.5 to 8 feet below existing surface. Native older alluvial soils were encountered beneath the artificial and possible fill soils at all locations, extended to at least the maximum depth explored of approximately 30 feet below existing surface.

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

2.5.6 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).

In 2021, the statewide GHG emissions inventory was updated for 2000 to 2019 emissions using the global warming potential (GWP) in IPCC's Fifth Assessment Report. Based on these GWPs, California produced 418.2 $MMTCO_2e$ (million metric tons of CO_2 equivalents) GHG emissions in 2019. California's transportation sector was the single largest generator of GHG emissions, producing 39.7 percent of the state's total emissions. Industrial sector emissions made up 21.1 percent, and electric power generation made up 14.1 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (10.5 percent), agriculture and forestry (7.6 percent) high GWP (4.9 percent), and recycling and waste (2.1 percent) (CARB, 2021)

California's GHG emissions have followed a declining trend since 2004. In 2019, emissions from GHG-emitting activities statewide were 418.2 $MMTCO_2e$, 7.2 $MMTCO_2e$ lower than 2018 levels and almost 13 $MMTCO_2e$ below the 2020 GHG Limit of 431 $MMTCO_2e$. California statewide GHG emissions dropped below the 2020 GHG Limit in 2016 and have remained below the 2020 GHG Limit since then, generally dropping since 2004. Transportation emissions continued to decline in 2019 as they had done in 2018, with even more substantial reductions due to a significant increase in renewable diesel (up 61 percent from 2018), making diesel fuel bio-components (biodiesel and renewable diesel) 27 percent of total on-road diesel sold in California. Total electric power emissions decreased by almost 7 percent in 2019, due to a continuing increase in renewable energy, including a 46 percent increase in available in-state hydropower in 2019. (CARB, 2021)

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

2.5.7 HAZARDS AND HAZARDOUS MATERIALS

A historical review of the Project site included review of aerial photographs, fire insurance maps, United States Geological Services (USGS) topographic maps, local street directories, and field reconnaissance. A Phase I ESA was prepared to assess the conditions of the Project site and

surrounding properties to determine the previous uses of the site and surrounding area in order to identify the likelihood of past uses have led to recognized environmental conditions (RECs), historical recognized conditions (HRECs), controlled recognized environmental conditions (CRECS), significant data gaps, or significant business risks in connection with the Project site.

Based on a review of aerial photographs, topographic maps, fire insurance maps, building permit records, and field reconnaissance, the Project site was vacant between 1896 and 1928. By 1928, based on aerial photography, the Project site is developed with agricultural land. Agricultural land was present on the site until 1951 and 1952, when the two warehouse structures that are presently located on the Project were first constructed. Similarly, six smaller buildings, of which at least two still exist at the Project site, were constructed. In 1957, Baker Oil Tools, Inc. and Laker Oil Tools, Inc. were listed as the occupants of the Project site. The current Project site occupant, Gehr Industries, has been present at the site since at least 1994. Various other tenants, including trucking companies, transportation services, wire and cable companies, and security companies have since occupied different spaces within the Project site. (Apex, 2020)

The Phase I ESA identifies the following CRECs, RECs, and BERs:

- CREC: The known concentrations of VOCs in soils and soil vapor at the Project site is considered to be a CREC. Regulatory authorities determined that the human health risks posed by the affected soils and soil vapor at the Project site are low enough that these impacted media can remain in place subject to the implementation of required management plans and engineering controls. Specifically, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a No Further Action letter in relation to the soils at the Project site and a Land Use Covenant (LUC) was recorded on the Project site, allowing for commercial/industrial use of the Project site without undertaking remedial action. The LUC also allows for residential use of the Project site but requires that engineering controls be implemented to mitigate potential vapor intrusion concerns. The LUC specifies that a commercial/industrial building does not require vapor intrusion mitigation systems.

- REC: The groundwater impacted by VOCs at the Project site is considered to be a REC.

- Business Environmental Risk (BER): The long-term groundwater monitoring program that is completed on behalf of the responsible party, Baker Hughes, is considered to pose a business environmental risk. During implementation of the Project, the Project applicant should be careful to plan development activities so that existing monitoring wells remain intact. Likewise, the Project applicant will need to negotiate an access agreement with Baker Hughes so that VOC concentrations will continue to be monitored in groundwater at the Project site. (Apex, 2020)

Refer to EIR Subsection 4.6, *Hazards and Hazardous Materials*, for a more detailed discussion of the Project site's existing setting related to hazards and hazardous materials.

2.5.8 NOISE

To describe the existing noise environment, the hourly noise levels were measured at five locations during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. Table 2-2, *Existing Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 7:00 p.m.), evening (7:00 p.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location.

Table 2-2 Existing Noise Level Measurements

Location	Description	Average Noise Level (dBA L_{eq})		
		Daytime	Evening	Nighttime
L1	North of the Project site on East Slauson Avenue near Mount Olive Memorial Park Jewish Cemetery located at 7231 Slauson Avenue	72.2	69.4	69.5
L2	Northeast of the Project site on Greenwood Avenue near a single-family residence located at 7508 Wellman Street.	67.1	62.8	62.8
L3	East of the Project site on Greenwood Avenue near a single-family residence located at 5829 Ramon Court.	65.5	63.8	63.5
L4	South of the Project site on Watcher Street near a single-family residence located at 6936 Watcher Street	57.3	56.9	54.4
L5	Southwest of the Project site on Danielson Court near a single-family residence located at 6730 Danielson Court.	55.5	55.9	51.6

Source: (Urban Crossroads, 2023e, Table 5-1)

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

2.5.9 TRANSPORTATION

The Project site is located in the southeastern portion of the City of Commerce. Regional access to the Project site is provided via the Interstate 5 Freeway (I-5), located approximately 0.22 miles northeast

of the Project site, and the Long Beach Freeway (I-710) is located approximately 2 miles west of the Project site.

Currently, vehicular access to the Project site is from two driveways that abut the northern portions of the Project site located on Slauson Avenue. One additional entryway provides access to the Project site on Greenwood Avenue at the intersection of Greenwood Avenue and Neenah Street. Sidewalks are present along both sides of Slauson Avenue and Greenwood Avenue.

The Project area is currently served by the City of Commerce Transport Department (CTD) and Los Angeles County Metropolitan Transportation Authority (Metro) which provides bus transportation services within the City of Commerce and into downtown Los Angeles. The nearest bus stop is located at the intersection of Slauson Avenue and Greenwood Avenue (serviced by the Metro 108 bus line), adjacent to the northeastern corner of the Project site, and at the intersection of Greenwood Avenue and Neenah Street (serviced by the City's Route 100 bus line).

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

2.5.10 Tribal Cultural Resources

The Project site is located within the eastern portion of the City of Commerce within Los Angeles County, California. According to the earliest available ethnographic data, the Gabrielino (Tongva) were the major tribe established in the Project area as of the late Holocene period (circa 3,000 YBP). (BFSA, 2021a) Fossil records and other evidence indicates human presence in coastal southern California region from as far back as 26,000 years ago.

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

3.0 PROJECT DESCRIPTION

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

3.1 PROJECT LOCATION

The 13.94-acre Project site is located at 7400 Slauson Avenue (Assessor's Parcel Number (APN) 6356-016-022) in the City of Commerce (see Figure 2-2, Vicinity Map). Refer to Draft EIR Sections 2.1, 2.2, and 2.3 for a description of the regional setting, local setting, and surrounding land uses, respectively.

3.2 STATEMENT OF OBJECTIVES

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

- Create a professional, well-maintained and attractive environment for the development of a warehouse building consistent with the underlying zoning adjacent to nearby transportation infrastructure such as the I-710 and I-5 Freeways.

- Provide the entitlements and framework for redevelopment of the site with a Class "A" warehouse and office building that is responsive to local and regional trade demands.

- Provide development that will enhance the City's economic well-being and employment opportunities for community residents.

- Facilitate a project that provides goods to the regional economy.

3.3 PROPOSED PROJECT

The Project Applicant is processing a Plot Plan and Development Plan Review for the 7400 Slauson Avenue Project ("Project") to redevelop the Project site with a modern, 292,029 sf speculative warehouse and office building with 33 loading docks on the south side of the building, as shown on *Figure 3-1, Site Plan*. Of the total square footage of the building, the Project would allocate 277,029

sf for warehousing/distribution, 5,000 sf for office uses, and 10,000 sf for office mezzanine. The Project would require the demolition of the existing buildings totaling 249,597 sf and associated parking.

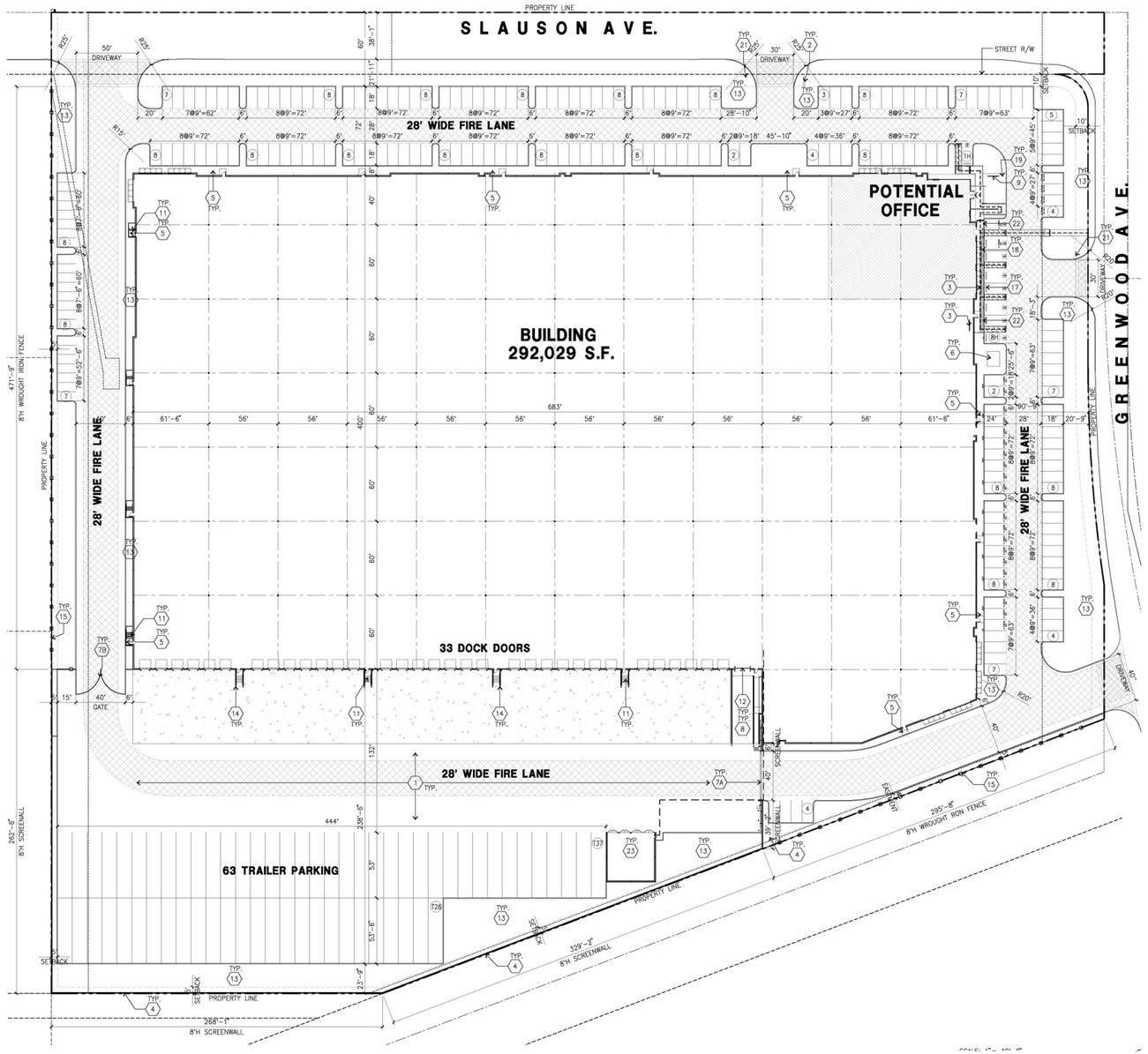
The Project would be developed in compliance with applicable provisions of the Commerce Municipal Code, including established development standards. A description of the following components of the Project is provided below:

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

3.3.1 Building Characteristics and Operations

As depicted in Figure 3-2, *Building Elevations*, the proposed building would be a one-story, 50-foot tall speculative warehouse/distribution and office facility, which has been designed to be visually compatible with the adjacent buildings. There are varying aesthetic colors and materials which eliminate the appearances of "sameness" or "flat" from the publicly visible elevations. The primary color scheme of the proposed building would include varying shades of white, grays, and dark grays and would be further accented with blue reflective glazing and decorative wood.

Although the ultimate end-user is unknown at this time, the Project proposes to allow 24-hour daily operations. Loading and unloading activities would occur at the rear of the building out of view from the public right-of-way. The Project building would be designed, constructed, operated, and/or maintained in accordance with Leadership in Energy and Environmental Design (LEED) standards. The Project building would be designed and built to meet the standard for LEED Silver Certification, or above.



SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- STANDARD PARKING STALL 9'–0" X 18'
- ACCESSIBLE PARKING STALL, 9' X 18 + 5' W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12' X 18' + 5' W ACCESSIBLE AISLE
- CLEAN AIR VANPOOL/EV
- LIGHTING FIXTURE
- 26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT
- LANDSCAPE
- PROPERTY LINE
- ACCESSIBILITY PATH OF TRAVEL

PROJECT DATA

SITE AREA	
In s.f.	607,122 s.f.
In acres	13.94 ac
BUILDING AREA	
Office 1st Floor	5,000 s.f.
Office Mezz Floor	10,000 s.f.
Warehouse	277,029 s.f.
TOTAL	292,029 s.f.
F.A.R.	0.48
BUILDING HEIGHT	40' Clear
AUTO PARKING REQUIRED	
Office: 1/300 s.f.	50 stalls
Warehouse: 1/2,000 s.f.	139 stalls
Dock door: 1/dock door	33 stalls
TOTAL	222 stalls
AUTO PARKING PROVIDED	
Standard (9' x 18')	168 stalls
Compact (7.5' x 15', 10% max)	23 stalls
ADA Accessible (9' x 18')	5 stalls
ADA Van Accessible (12' x 18')	2 stall
EVCS Standard (9' x 18')	21 stalls
EVCS Accessible Standard (9' x 18')	1 stall
EVCS Accessible Van (12' x 18')	1 stall
Clean Air/Vanpool/EV (9' x 18')	3 stalls
TOTAL	224 stalls
TRAILER PARKING REQUIRED	
1 Per Dock door	33 doors
TRAILER PARKING PROVIDED	
Trailer (12' x 53')	63 stalls
BIKE PARKING REQUIRED	
4 for the 1st 50,000 sf	4 racks
after 1st 50,000sf, 1/50,000 sf	5 racks
TOTAL	9 racks
BIKE PARKING PROVIDED	
Short Term (exterior)	11 racks
Long Term (interior)	11 racks
ZONING ORDINANCE FOR CITY	
Zoning Designation -Heavy manufacturing (M2)	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 50' within 100' of residential zone	
MAXIMUM LOT COVERAGE	
Coverage - 60%	
MAXIMUM FLOOR AREA RATIO	
FAR - 1:1	
LANDSCAPE REQUIREMENT	
Percentage - 7.5% of parking lot area	
LANDSCAPE AREA PROVIDED	
55366 sf	

SETBACKS	
Building	Landscape
Front -15'	10' from ROW if adjoin street
Side/Rear - 5' adjoine residential zone	15' adjoin residential zone
otherwise none	5' along wall on PL

Note: Future charging spaces qualify as deignated parking for clean air vehicles per CGBSC 5.106.5.3.5

Source(s): HPA (05-26-2021)

Figure 3-1

Not to Scale

Site Plan

3.3.2 TRAFFIC, CIRCULATION AND PARKING

A. Traffic

Based on a Project-specific analysis conducted by Urban Crossroads, Inc. (EIR Appendix I1), and as discussed in Subsection 4.8, *Transportation*, to this EIR, the proposed Project is estimated to result in a total of 886 daily trips with 114 trips in the AM peak hour and 110 trips in the PM peak hour. The existing use currently generates 928 two-way trips per day, with 60 a.m. peak hour and 64 p.m. peak hour trips. Based on a comparison of the Project and existing use, the Project is anticipated to generate net reduction of 42 two-way trips per day and net increase of 55 AM peak hour trips and 47 PM peak hour trips.

B. Vehicle Circulation

As depicted in Figure 3-3, *Circulation Plan*, access to the Project site would be provided by two driveways along North Slauson Avenue to the north and two driveways along Greenwood Avenue to the east. The first driveway, intended for both truck traffic and vehicle traffic, would be located at the northwest corner of the Project site along Slauson Avenue. The second driveway, east of the first driveway along Slauson Avenue, is intended for vehicle traffic only. The third driveway, along Greenwood Avenue located slightly to the north of the center of the proposed eastern boundary, is intended for vehicle traffic only. The fourth driveway along Greenwood Avenue, located south of the third driveway at the southeast corner of the Project boundary, is intended for both truck traffic and vehicle traffic. Truck traffic would enter from either the northwest or southeast corner of the Project site and would follow the perimeter of the proposed building. Loading activities would be conducted at the rear of the building, shielded from view from the adjacent streets.

C. Parking

Truck trailer parking spaces (63 total) would be provided within the truck courts/loading areas on the south side of the building. The Project includes aboveground surface automobile parking with 224 parking spaces along the boundaries of the Project site, with a larger surface parking area located east of the Project building. Of the 224 spaces, 167 stalls would be designated as standard, 23 stalls would be designated as compact, 5 stalls would be designated ADA Accessible, 2 stalls would be designated as ADA Van Accessible, 21 stalls would be designated as Electronic Vehicle Charging Station (EVCS) standard, 1 stall would be designated as EVCS accessible standard, 1 stall would be designated EVCS accessible van, and 4 stalls would be designated as Clean Air/Vanpool/EV. Parking would be primarily located along the northern and eastern sides of the proposed structure, with some spaces located along the northwestern side of the structure. The Project would also install 11 short-term and 11 long-term bike parking spaces.

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. 12'X14' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. 9'X10' OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING
12. NOT USED
13. EXTERIOR CANOPY
14. INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS

GENERAL NOTES - ELEVATIONS

A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON
P. EXTERIOR WALL SHALL BE PROVIDED WITH A GRAFFITI-RESISTANT COATING OR PAINT, TO A HEIGHT OF 12' FOR BUILDING OR STRUCTURE SURFACES THAT ARE NOT INTENDED TO BE PAINTED (E.G. SPLIT-FACE BLOCK, DECORATIVE TILE, ETC.).

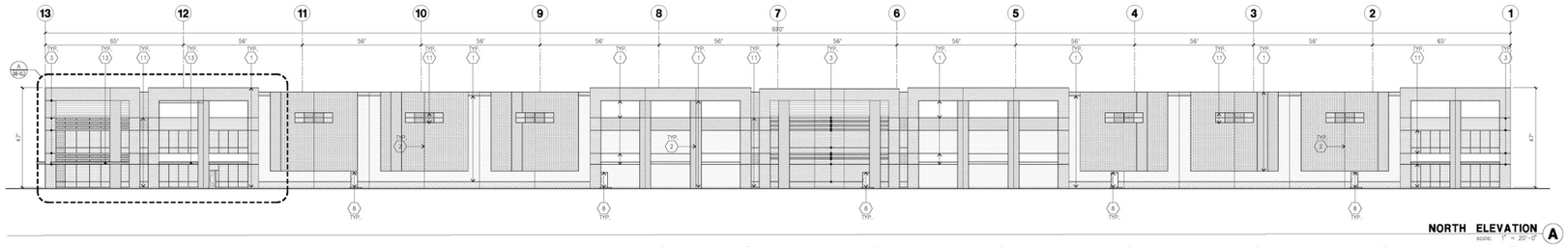
COLOR SCHED. - ELEVATIONS

1. CONCRETE TILT-UP PANEL PAINT BRAND, SHERWIN-WILLIAMS SW7005 PURE WHITE
2. CONCRETE TILT-UP PANEL PAINT BRAND, SHERWIN-WILLIAMS SW7071 GRAY SCREEN
3. CONCRETE TILT-UP PANEL PAINT BRAND, SHERWIN-WILLIAMS SW7072 ONLINE
4. CONCRETE TILT-UP PANEL PAINT BRAND, SHERWIN-WILLIAMS SW7073 NETWORK GRAY
5. CONCRETE TILT-UP PANEL PAINT BRAND, SHERWIN-WILLIAMS SW7074 SOFTWARE
6. CONCRETE TILT-UP PANEL PAINT BRAND, SHERWIN-WILLIAMS SW7076 CYBERSPACE
7. CONCRETE TILT-UP PANEL PAINT BRAND, ARIZONA TILE MORE WOOD CILIEGIO 8" X 47" SIDE TILE
8. MULLIONS COLOR, BLACK ANODIZED
9. GLAZING COLOR, BLUE REFLECTIVE GLAZING
10. METAL CANOPY PAINT BRAND, SHERWIN-WILLIAMS ACRYLIC LATEX SYSTEM HIGH PERFORMANCE SW 7005 PURE WHITE

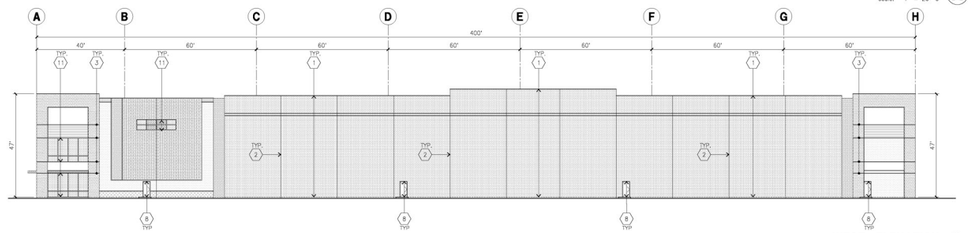
GLAZING LEGEND

S — TEMPERED SPANDREL GLASS

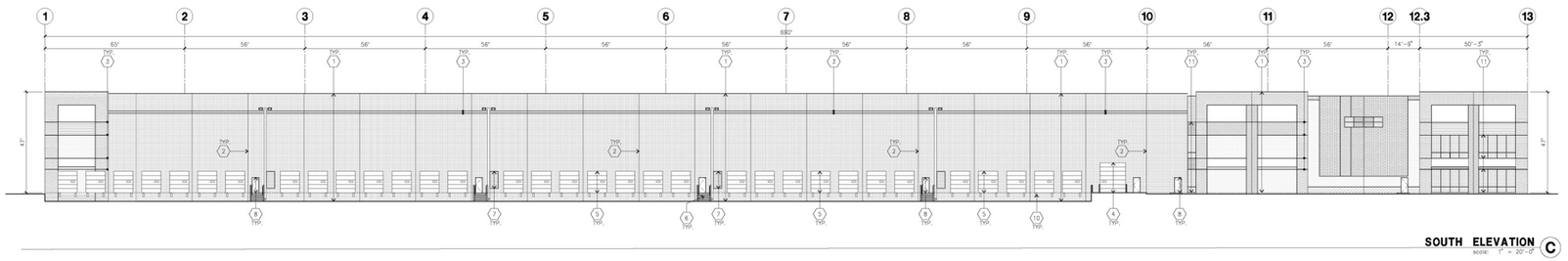
V — TEMPERED VISION INSULATED GLASS PPG: VISTACOOL (2) PACIFICA + SOLARBAN SOLARBAN 60 (3) CLEAR U VALUE: 0.27, SHGC: 0.21 AND VLT: 26% 1" INSULATED GLASS WITH 1/2" AIRSPACE AND (2) 1/4" LITES.



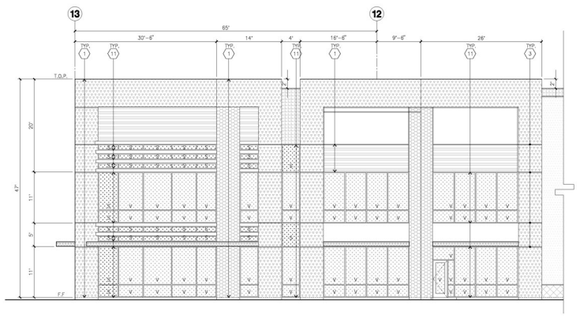
NORTH ELEVATION (A)
scale: 1" = 20'-0"



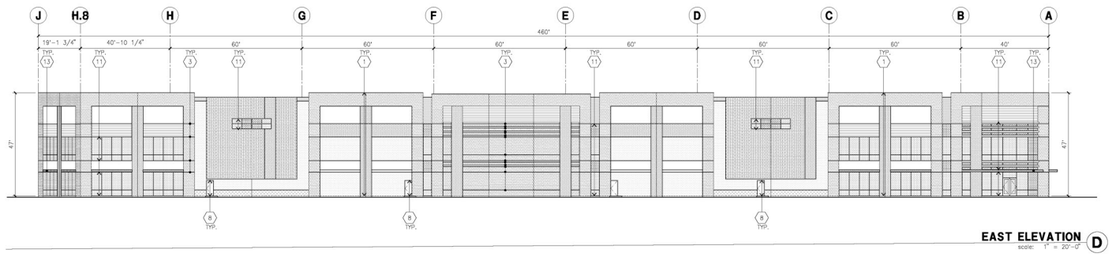
WEST ELEVATION (B)
scale: 1" = 20'-0"



SOUTH ELEVATION (C)
scale: 1" = 20'-0"



ENLARGED NORTH ELEVATION (A)
scale: 1/8" = 1'-0"



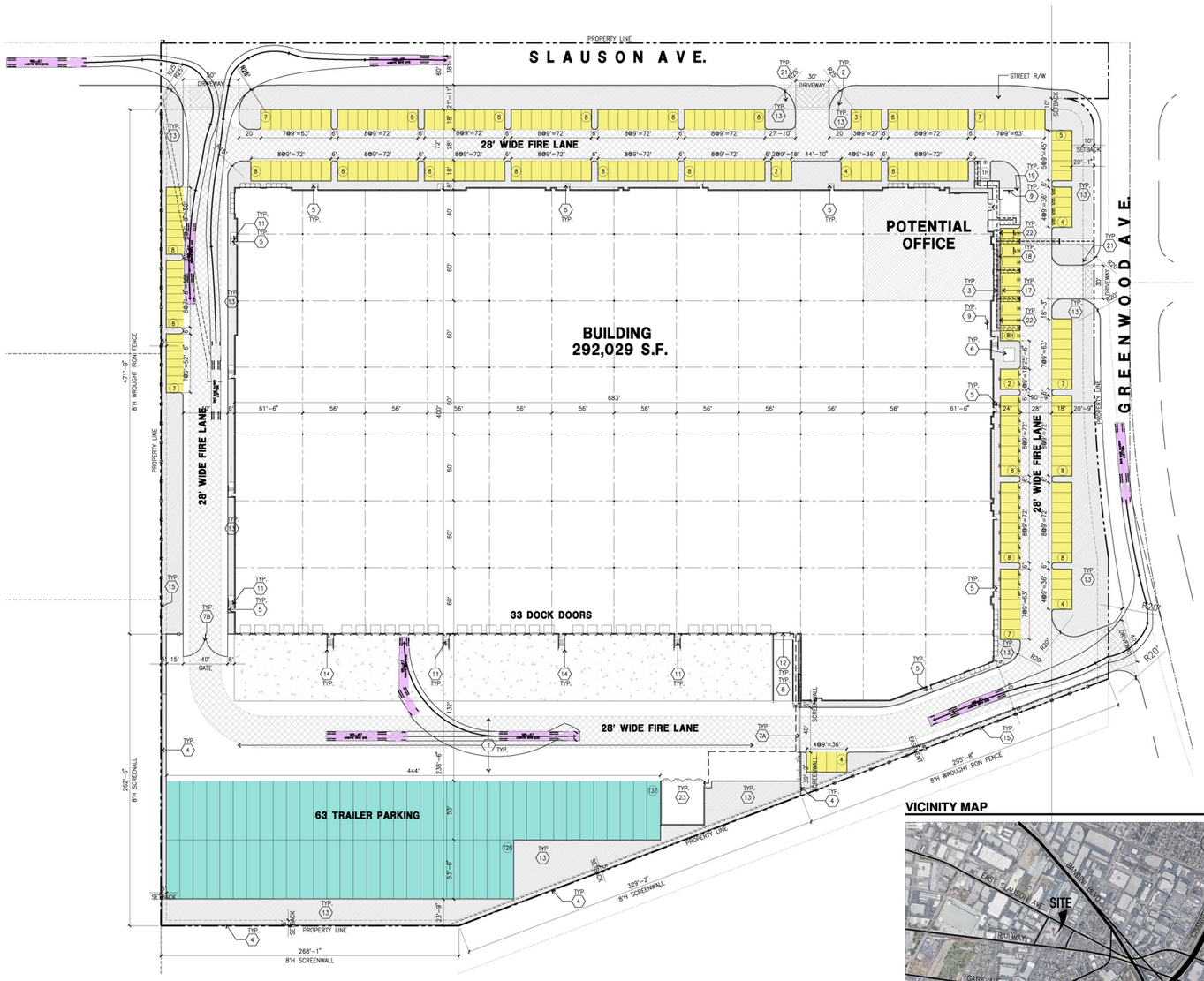
EAST ELEVATION (D)
scale: 1" = 20'-0"

Source(s): HPA (06-23-2021)

Figure 3-2

Not to Scale

Building Elevations



PROJECT DATA

SITE AREA	
In s.f.	607,122 s.f.
In acres	13.94 ac
BUILDING AREA	
Office 1st Floor	5,000 s.f.
Office Mezz Floor	10,000 s.f.
Warehouse	277,029 s.f.
TOTAL	292,029 s.f.
F.A.R	0.48
BUILDING HEIGHT	40' Clear
AUTO PARKING REQUIRED	
Office: 1/300 s.f.	50 stalls
Warehouse: 1/2,000 s.f.	139 stalls
Dock door: 1/dock door	33 stalls
TOTAL	222 stalls
AUTO PARKING PROVIDED	
Standard (9' x 18')	168 stalls
Compact (7.5' x 15', 10% max)	23 stalls
ADA Accessible (9' x 18')	5 stalls
ADA Van Accessible (12' x 18')	2 stall
EVCS Standard (9' x 18')	21 stalls
EVCS Accessible Standard (9' x 18')	1 stall
EVCS Accessible Van (12' x 18')	1 stall
Clean Air/Vanpool/EV (9' x 18')	3 stalls
TOTAL	224 stalls
TRAILER PARKING REQUIRED	
1 Per Dock door	33 doors
TRAILER PARKING PROVIDED	
Trailer (12' x 53')	63 stalls
BIKE PARKING REQUIRED	
4 for the 1st 50,000 sf	4 racks
after 1st 50,000sf, 1/50,000 sf	5 racks
TOTAL	9 racks
BIKE PARKING PROVIDED	
Short Term (exterior)	11 racks
Long Term (interior)	11 racks
ZONING ORDINANCE FOR CITY	
Zoning Designation -Heavy manufacturing (M2)	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 50' w ithin 100' of residential zone	
MAXIMUM LOT COVERAGE	
Coverage - 60%	
MAXIMUM FLOOR AREA RATIO	
FAR - 1:1	
LANDSCAPE REQUIREMENT	
Percentage - 7.5% of parking lot area	
LANDSCAPE AREA PROVIDED	
55366 sf	
SETBACKS	
Building	Landscape
Front -15'	10' from ROW if adjoin street
Side/Rear - 5' adjoine residential zone	15' adjoin residential zone
otherw ise none	5' along w all on PL

Note: Future charging spaces qualify as deignated parking for clean air vehicles per CGBSC 5.106.5.3.5

Source(s): HPA (02-04-2021)

Figure 3-3

Not to Scale

Circulation Plan

D. Landscaping, Walls, and Lighting

As depicted on *Figure 3-4, Landscape Plan*, the Project would include 55,366 square feet of landscaping. The minimum width of the parking perimeter landscaping between the street right-of-way and parking area would be 10 feet. A minimum of one tree would be provided for every eight parking spaces, and would be planted to provide uniform shade and coverage. One additional tree will be planted for every three hundred square feet (sf) of landscaped area. All trees would be of a minimum 24-inch box size. A 20-foot landscaping buffer between parking and sidewalk will be provided along Greenwood Avenue.

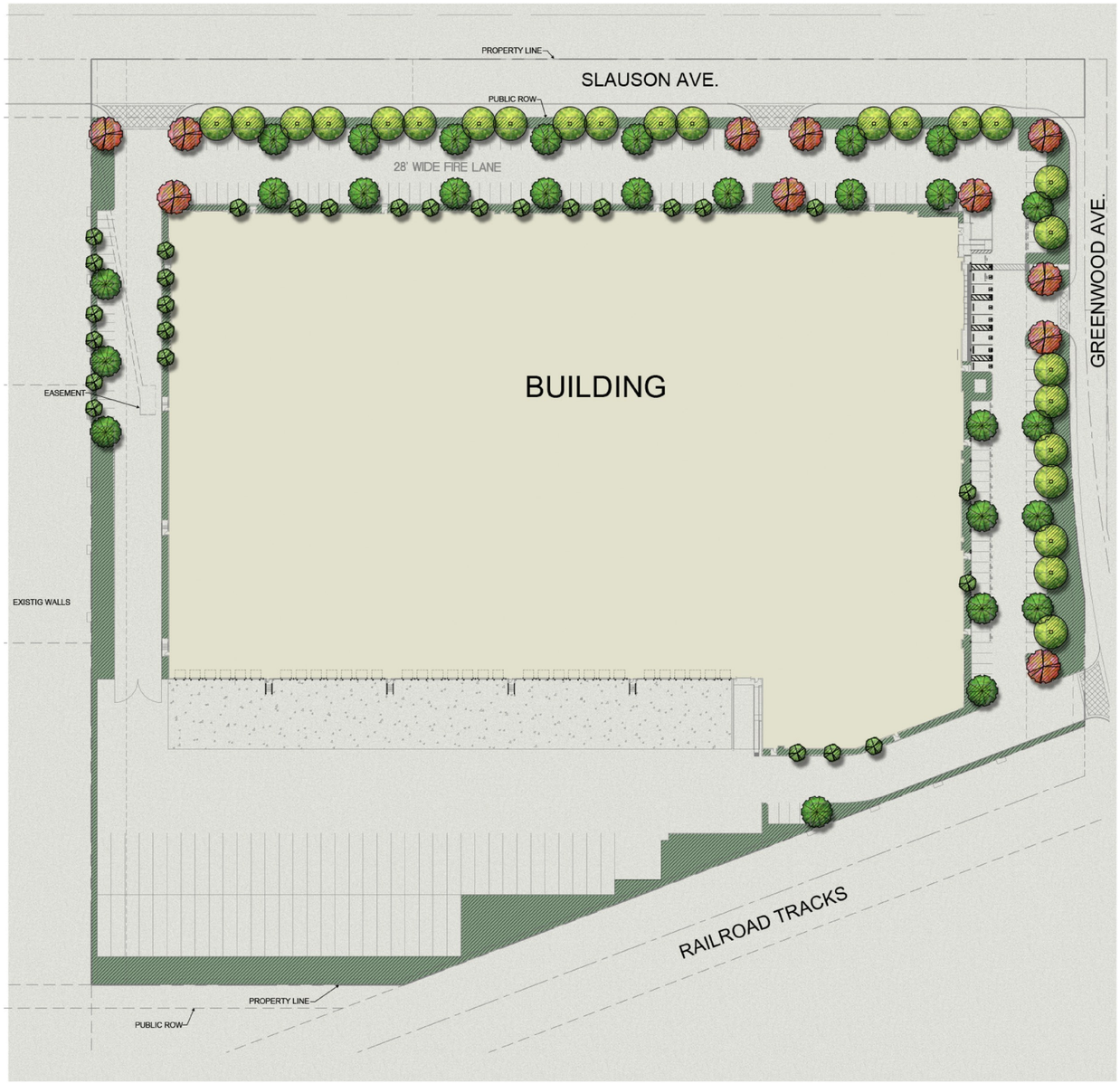
An 8-foot wrought iron fence would border the Project site's eastern boundary. Additionally, the Project Applicant would construct an 8-foot concrete screen wall on the western and southern boundary, which would transition to an 8-foot wrought iron fence from the gate entry to the eastern truck driveway access.

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

3.4 PROJECT CONSTRUCTION DETAILS

A. Proposed Physical Disturbances

For the purposes of analysis throughout this EIR, it is assumed that implementation of the Project would result in disturbance to the entire 13.94-acre Project site. Additionally, the Project would result in temporary impacts to site-adjacent areas during construction. The Project would not result substantial off-site disturbances, such as modifications to water, sewer, and roadway facilities. The conceptual grading plan indicates that the Project site will require 5,250 cubic yards (CY) of cut and 33,400 CY of fill, requiring 28,150 CY of imported fill.



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Chitalpa tashkentensis Chitalpa	24" Box	27	L	Standard
	Koelreuteria bipinnata Chinese Flame Tree	36" Box	11	M	Multi
	Rhus lancea African Sumac	24" Box	25	L	Standard
	Tristania conferta Brisbane Box	15 Gal	28	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Acca sellowiana Pineapple Gauva	5 Gal	0	M	
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	0	M	
	Dianella tasmanica Dianella	5 Gal	0	M	
	Dodonaea viscosa 'Purpurea' Hopseed Bush	5 Gal	0	M	
	Ligustrum j. Texanum Texas Privet	5 Gal	0	M	
	Pittosporum tobira 'Variegata' Variegated Mock Orange	5 Gal	0	M	Hedge
	Pittosporum t. 'Wheeleri' Wheeler's Dwarf	5 Gal	0	M	
	Rhaphiolepis i. 'Clara' Indian Hawthorn	5 Gal	0	M	Hedge
	Rhaphiolepis i. 'Springtime' Indian Hawthorn	5 Gal	0	M	Hedge
	Salvia greggii Autumn Sage	5 Gal	0	L	
	Salvia leucantha Mexican Sage	5 Gal	0	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave 'Blue Flame' Blue Flame Agave	5 Gal	0	L	
	Agave 'Blue Glow Blue Glow Agave	5 Gal	0	L	
	Aloe striata Coral Aloe	1 Gal	0	L	
	Dasylerion wheeleri Desert Spoon	5 Gal	0	L	
	Hesperaloe parviflora Red Yucca	5 Gal	0	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Hemerocallis hybridus-Yellow Yellow Day Lily	1 Gal	24" O.C.	M	
	Lantana 'Gold Mound' Yellow Lantana	1 Gal	36" O.C.	L	
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L	
	Muhlenbergia capillaris Pink Muhly	1 Gal	36" O.C.	L	Grass
	Myoporum parvifolium Myoporum	1 Gal	36" O.C.	L	
	Rosa 'Flower Carpet' -Red Red Flower Carpet Rose	1 Gal	30" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	
	Trachelopspermum jasminiodes Star Jasmine	1 Gal	24" O.C.	M	

Source(s): Hunter Landscaping (12-03-2021)

Figure 3-4

Not to Scale

Landscape Plan

B. Timing of Construction Activities

Construction is expected to occur over a 12-month period. For analytical purposes, the number of days for each construction phase will be based on CalEEMod default settings, which are based on empirical data collected by air pollution regulators. The anticipated duration of each phase of construction is identified in Table 3-1, *Construction Activity Phases and Durations.*

Table 3-1 Construction Activity Phases and Durations

Phase Name	Days
Demolition	20
Site Preparation	10
Grading	30
Building Construction	300
Paving	20
Architectural Coating	40

C. Anticipated Construction Equipment

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

Table 3-2 Construction Equipment Requirements

Activity	Equipment	Number	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Crushing/Proc. Equipment	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction/Concrete Pours	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8

Activity	Equipment	Number	Hours Per Day
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

3.5 SUMMARY OF REQUESTED ACTIONS

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

- Certification of the 7400 Slauson Avenue Environmental Impact Report
- Adoption of the Mitigation Monitoring and Reporting Program
- Approval of a Plot Plan and Development Plan Review

4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

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

In compliance with the procedural requirements of CEQA, the City of Commerce prepared an Initial Study (Appendix A of this Draft EIR) to determine the scope of environmental analysis for this EIR. Public comment on the scope of this EIR consisted of written comments received by the City of Commerce in response to the NOP; the City received no comments from members of the public at the EIR scoping meeting held on June 24, 2022. At the scoping meeting, Planning Commissioners inquired about the nearby library and requested community outreach to nearby residents and businesses.

Taking all known information and public comments into consideration, nine (9) primary environmental subject areas are evaluated in this Section 4.0, as listed below. Each subsection of this Section 4.0 evaluates several specific subject matters related to the general topic of the subsection. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein. Environmental issues and their corresponding sections are:

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

The Initial Study (Appendix A) also determined that the Project would result in less than significant or no impacts with respect to eleven (11) environmental topics (see Section 5.4 of this EIR). These topics are not discussed further in this EIR and include:

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

4.0.1 ORGANIZATION OF ENVIRONMENTAL ANALYSIS

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

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

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

4.0.2 TERMINOLOGY USED IN THIS EIR

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

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

- **Less than significant.** The project would not cause any substantial, adverse change in the environment.

- **Significant impact.** A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

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

- **Less than significant with mitigation incorporated.** A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).

- **Significant and unavoidable.** A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to

the Project's impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

4.0.3 Scope of Cumulative Effects Analysis

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

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

A. *A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.*

B. *A summary of projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions.*

The cumulative impact analysis in this EIR uses Method B. Method B uses the Commerce 2010 General Plan Land Use Element, which was adopted by the Commerce City Council in January of 2008. Cumulative impact analyses will also use the projections in long-range planning documents such as the General Plan, SCAG's Connect SoCal, and South Coast Air Quality Management District's (AQMD) 2016 Air Quality Management Plan (AQMP).

The potential build out under the General Plan's implementation is indicated in Table 4.0-1, *Development Intensity*. The total buildout of the General Plan would result in 66,913,600 square feet of non-residential development.

Table 4.0-1 Development Intensity

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

Source: (City of Commerce, 2008, Table 3-2)

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

- **Air Quality.** Air quality impacts are based on the regional boundaries of the SCAB.

- **Cultural Resources.** The cumulative analysis of cultural resources, including historical resources, includes the Project site and immediately surrounding area.

- **Energy.** Energy impacts are based on the service areas of Southern California Edison and SoCalGas.

- **Geological Resources.** Geologic and soils impacts are site specific and generally do not combine to result in cumulative impacts. However, the cumulative analysis considers the Project site and nearby related projects.

- **Greenhouse Gas (GHG) Emissions.** Potential GHG impacts are not bounded by geography but affect global climate change. The assessment of cumulative GHG impacts, therefore, is based on consistency with South Coast AQMD's GHG emissions threshold to achieve targeted reductions.

- **Hazards and Hazardous Materials.** Cumulative analysis highlights the regulatory requirements related to the storage, handling, and use of hazardous substances. Project impacts, however, are site specific, and generally would not combine with impacts of other projects to result in cumulatively considerable impacts. However, the cumulative analysis considers the Project site and nearby related projects.

- **Noise.** Cumulative traffic noise is assessed relative to applicable Commerce General Plan noise-level standards and considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site. The study area is aligned with the traffic study area.

- **Transportation.** The cumulative analysis considers development of the Project in conjunction with other development projects in the vicinity of the Project site.

- **Tribal Cultural Resources.** Considers Native American territory that includes the Project site and surrounding area, as provided by the Native American Heritage Commission.

4.1 AIR QUALITY

This Subsection is based in part on two technical studies that were prepared by Urban Crossroads, Inc. to evaluate the Project's potential to adversely affect local and regional air quality. The air quality impact analysis prepared for the Project is titled *7400 Slauson Avenue Air Quality Impact Analysis*, dated February 22, 2023, and appended to this EIR as Appendix B1 (Urban Crossroads, 2023a). The mobile source health risk assessment prepared for the Project is titled *7400 Slauson Avenue Mobile Source Health Risk Assessment*, dated February 22, 2023, and appended to this EIR as Appendix B2 (Urban Crossroads, 2023b).

4.1.1 EXISTING CONDITIONS

A. South Coast Air Basin

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of South Coast Air Quality Management District (South Coast AQMD). The SCAB encompasses a 6,745-square mile subregion of the South Coast AQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. (Urban Crossroads, 2023a, p. 9)

B. Climate and Meteorology

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (Urban Crossroads, 2023a, p. 9)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2023a, p. 9)

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists

of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. (Urban Crossroads, 2023a, pp. 9-10)

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14½ hours of possible sunshine. (Urban Crossroads, 2023a, p. 10)

The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2023a, p. 10)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO_X) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2023a, p. 10)

C. Criteria Pollutants and Associated Health Effects

Criteria pollutants are pollutants that are regulated through the development of human health-based and/or environmentally-based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified below: (Urban Crossroads, 2023a, pp. 11-17)

- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest in the winter during the morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. CO is emitted directly from internal combustion engines; therefore, motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Therefore, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. The most common symptoms associated with CO poisoning include headache, nausea, vomiting, dizziness, fatigue, and weakness. Individuals most at risk to the effects of CO include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic oxygen deficiency.

- **Sulfur Dioxide (SO_2)** is a colorless gas or liquid. SO_2 enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_X). SO_2 is a respiratory irritant to people afflicted with asthma. After a few minutes' exposure to low levels of SO_2, asthma sufferers can experience breathing difficulties, including airway constriction and reduction in breathing capacity. Although healthy individuals do not exhibit similar acute breathing difficulties in response to SO_2 exposure at low levels, animal studies suggest that very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

- **Nitrogen Oxides (NO_X)** consist of nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere, and reduced visibility. Of the nitrogen oxide compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitoring stations. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2. Short-term exposure to NO_2 can result in resistance to air flow and airway contraction in healthy subjects. Exposure to NO_2 can result decreases in lung functions in individuals with asthma or chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema), as these individuals are more susceptible to the effects of NO_X than healthy individuals.

- **Ozone (O_3)** is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, warm temperatures, and light wind conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high ozone levels.

- **Particulate Matter less than 10 microns (PM_{10})** is an air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to enter the lungs where they may be deposited, resulting in the adverse health effects discussed below for $PM_{2.5}$. PM_{10} also causes visibility reduction.

- **Particulate Matter less than 2.5 microns ($PM_{2.5}$)** is a similar air pollutant to PM_{10} consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO_2 release from power plants and industrial facilities and nitrates that are formed from NO_X release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles is highly dependent on location, time of year, and weather conditions. Elevated ambient concentrations of fine particulate matter (PM_{10} and $PM_{2.5}$) have been linked to an increase in respiratory infections, number, and severity of asthma attacks, and increased hospital admissions. Some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children, appear to be more susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$.

- **Volatile Organic Compounds (VOCs)** and **Reactive Organic Gasses (ROGs)** are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. Both VOCs and ROGs are precursors to ozone and contribute to the formation of smog through atmospheric photochemical reactions. VOCs and ROGs have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have

an odor, including such common VOCs as gasoline, alcohol, and the solvents used in paints. Odors generated by VOCs can irritate the eye, nose, and throat, which can reduce respiratory volume. In addition, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system.

- **Lead (Pb)** is a heavy metal that is highly persistent in the environment. Historically, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the South Coast AQMD's regular air quality monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure.

- **Odor** is the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, natures, and vehicles. Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress.

D. Existing Air Quality

Air quality is measured at established South Coast AQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 4.1-1, *Ambient Air Quality Standards*.

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards. At the time of Draft EIR preparation, the most recent state and federal standards were updated by the California Air Resources Board (CARB) on May 4, 2016 and are presented in Table 4.1-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for O_3, CO, SO_2 (1 and 24 hour), NO_2, PM_{10}, and $PM_{2.5}$ are not to be exceeded. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that

the South Coast AQMD meets the standards set by the EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) is drafted by CARB. The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area. (Urban Crossroads, 2023a, p. 18)

Table 4.1-1 Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	---	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		---		
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	---	---	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/ m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/ m^3)	---	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/ m^3)		9 ppm (10 mg/ m^3)	---	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/ m^3)		---	---	
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/ m^3)	Gas Phase Chemiluminescence	110 ppb (118 µg/ m^3)	---	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/ m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)	1 Hour	0.25 ppm (665 µg/ m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/ m^3)	---	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	---		---	0.5 ppm (1300 µg/ m^3)	
	24 Hour	0.04 ppm (105 µg/ m^3)		0.14 ppm (for certain areas)	---	

Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
	Annual Arithmetic Mean	---		0.030 ppm (for certain areas)	---	
Lead	30 Day Average	1.5 µg/ m^3	Atomic Absorption	---		High Volume Sampler and Atomic Absorption
	Calendar Quarter	---		1.5 µg/ m^3 (for certain areas)	Same as Primary Standard	
	Rolling 3-Month Average	---		0.15 (1.5 µg/ m^3)		
Visibility Reducing Particles	8 Hour	See Footnote 14	Beta Attenuation and Transmittance through filter tape			
Sulfates	24 Hour	25 µg/ m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/ m^3)	Ultraviolet Fluorescence			
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/ m^3)	Gas Chromatography			

See footnotes in Appendix B1.
Source: (Urban Crossroads, 2023a, Table 2-2)

1. Attainment Status of Criteria Pollutants in the SCAB

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2 which are known as criteria pollutants. The South Coast AQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district. On January 5, 2021, CARB posted the 2020 amendments to the state and national area designations. The attainment status for criteria pollutants within the SCAB is summarized in Table 4.1-2, *Attainment Status of Criteria Pollutants in the South Coast Air Basin* (Urban Crossroads, 2023a, p. 21)

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

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/ Attainment
NO_2	Attainment	Unclassifiable/ Attainment
SO_2	Attainment	Unclassifiable/ Attainment
Pb[1]	Attainment	Unclassifiable/ Attainment

"—" The national 1-hour O_3 standard was revoked effective June 15, 2005.
1. The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.
Source: (Urban Crossroads, 2023a, Table 2-3)

2. Air Quality History and Trends

❑ Criteria Pollutants

South Coast AQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SCAB air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the SCAB. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. (Urban Crossroads, 2023a, p. 26)

The South Coast AQMD is the lead agency charged with regulating air quality emission reductions for the entire SCAB. South Coast AQMD has created an air quality management plan (AQMP) which represents a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SCAB. The 2012 AQMP states, "the remarkable historical improvement in air quality since the 1970's is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs." (Urban Crossroads, 2023a, pp. 26-27)

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

Emissions of O_3, NO_X, VOC, and CO have been decreasing in the SCAB since 1975. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicles miles traveled (VMT) in the SCAB continue to increase, NO_X and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. O_3 contour maps show that the number of days exceeding the 8-hour NAAQS has decreased between 1980 and 2020. For 2020, there was an overall decrease in exceedance days compared with the 1980 period. However, as shown below, O_3 levels have increased in the past three years due to higher temperatures and stagnant weather conditions. Notwithstanding,

O_3 levels in the SCAB have decreased substantially over the last 30 years with the current maximum measured concentrations being approximately one-third of concentrations within the late 70's. (Urban Crossroads, 2023a, p. 27)

The overall trends of PM_{10} and $PM_{2.5}$ levels in the air (not emissions) show an overall improvement since 1975. Direct emissions of PM_{10} have remained somewhat constant in the SCAB and direct emissions of $PM_{2.5}$ have decreased slightly since 1975. Area wide sources (fugitive dust from roads, dust from construction, and other sources) contribute the greatest amount of direct particulate matter emissions. As with other pollutants, the most recent PM_{10} statistics show an overall improvement as illustrated below. During the period for which data are available, the 24-hour national annual average concentration for PM_{10} decreased by approximately 46%, from 103.7 microgram per cubic meter (µg/m³) in 1988 to 55.5 µg/m³ in 2020. Although the values are below the federal standard, it should be noted that there are days within the year where the concentrations will exceed the threshold. The 24-hour state annual average for emissions for PM_{10} have decreased by approximately 64%, from 93.9 µg/m³ in 1989 to 33.9 µg/m³ in 2020. Although data in the late 1990's show some variability, this is probably due to the advances in meteorological science rather than a change in emissions. Similar to the ambient concentrations, the calculated number of days above the 24-hour PM_{10} standards has also shown an overall drop. (Urban Crossroads, 2023a, p. 28)

While the 2012 AQMP PM_{10} attainment demonstration and the 2015 associated supplemental SIP submission indicated that attainment of the 24-hour standard was predicted to occur by the end of 2015, it could not anticipate the effect of the ongoing drought on the measured $PM_{2.5}$. (Urban Crossroads, 2023a, p. 30)

The 2006 to 2010 base period used for the 2012 attainment demonstration had near-normal rainfall. While the trend of $PM_{2.5}$-equivalent emission reductions continued through 2015, the severe drought conditions contributed to the $PM_{2.5}$ increases observed after 2012. As a result of the disrupted progress toward attainment of the federal 24-hour $PM_{2.5}$ standard, South Coast AQMD submitted a request and the EPA approved, in January 2016, a "bump up" to the nonattainment classification from "moderate" to "serious," with a new attainment deadline as soon as practicable, but not beyond December 31, 2019. As of March 14, 2019, the EPA approved portions of a SIP revision submitted by California to address CAA requirements for the 2006 24-hour $PM_{2.5}$ NAAQS in the Los Angeles-SCAB Serious $PM_{2.5}$ nonattainment area. The EPA also approved 2017 and 2019 motor vehicle emissions budgets for transportation conformity purposes and inter-pollutant trading ratios for use in transportation conformity analyses. (Urban Crossroads, 2023a, p. 30)

The draft 2022 AQMP has been prepared by South Coast AQMD to continue to evaluate current integrated strategies and control measures to meet the NAAQS, particularly the EPA's strengthened ozone standard. These approaches include the use of incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional

Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and updated emission inventory methodologies for various source categories. (Urban Crossroads, 2023a, p. 30)

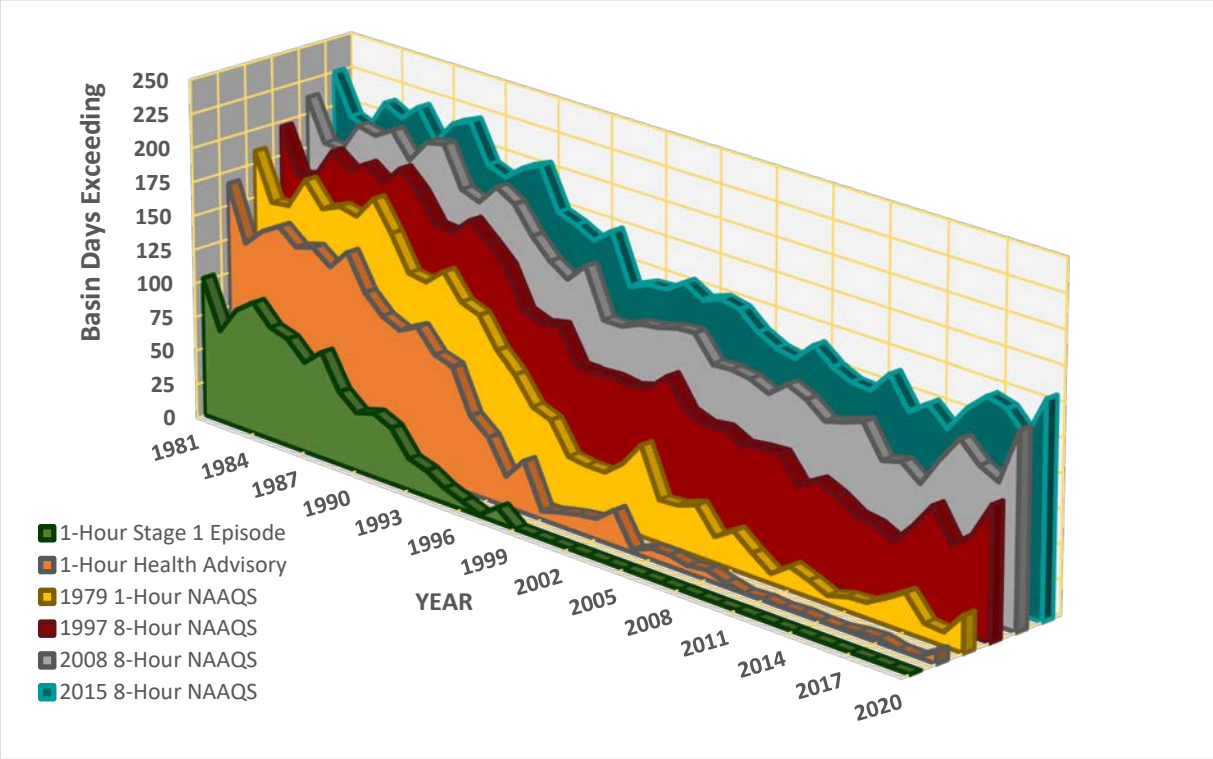
The draft 2022 AQMP was released in August 2022 and public comment closed on October 18, 2022. The SCAQMD Governing Board adopted the draft 2022 AQMP at its December 2, 2022, meeting. The draft 2022 AQMP requires CARB's adoption before submittal for U.S. EPA's final approval, which is expected to occur sometime in 2023. (Urban Crossroads, 2023a, p. 31)

The most recent CO concentrations in the SCAB are shown below. CO concentrations in the SCAB have decreased markedly — a total decrease of more about 80% in the peak 8-hour concentration from 1986 to 2012. It should be noted 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB. The number of exceedance days has also declined. The entire SCAB is now designated as attainment for both the state and national CO standards. Ongoing reductions from motor vehicle control programs should continue the downward trend in ambient CO concentrations. (Urban Crossroads, 2021a, p. 30)

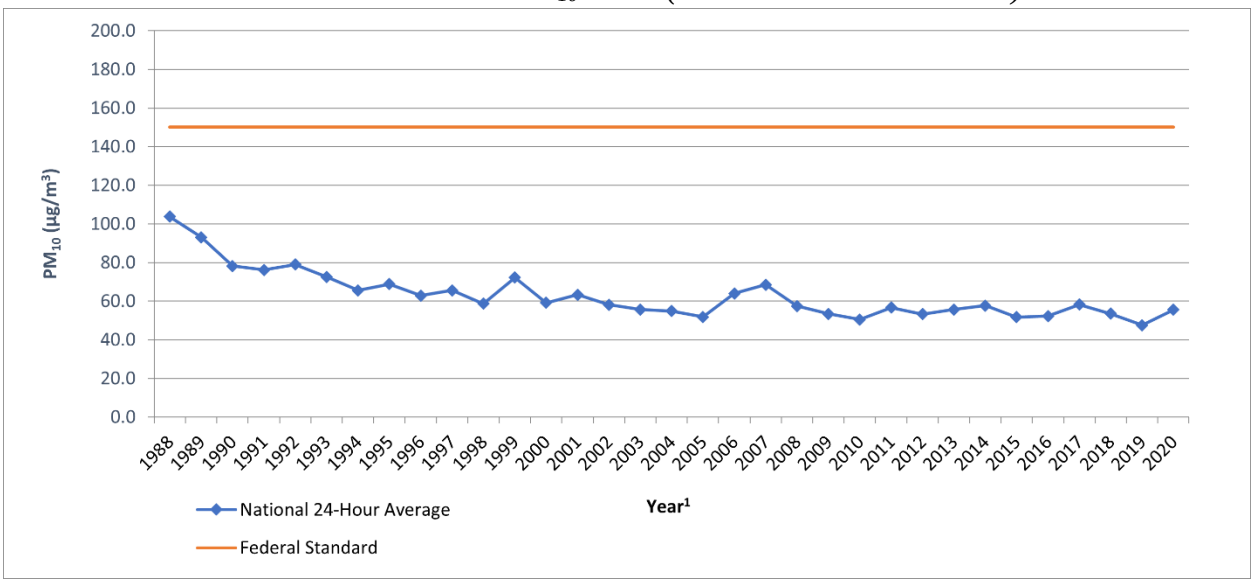
Part of the control process of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD's CEQA Air Quality Handbook (1993) (1993 CEQA Handbook). The single threshold of significance used to assess Project direct and cumulative impacts has in fact "worked" as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades. As stated by the SCAQMD, the District's thresholds of significance are based on factual and scientific data and are therefore appropriate thresholds of significance to use for this Project. (Urban Crossroads, 2023a, p. 31)

The most recent NO_2 data for the SCAB is shown below. Over the last 50 years, NO_2 values have decreased significantly; the peak 1-hour national and state averages for 2020 is approximately 80% lower than what it was during 1963. The SCAB attained the State 1-hour NO_2 standard in 1994, bringing the entire state into attainment. A new state annual average standard of 0.030 ppm was adopted by the CARB in February 2007. The new standard is just barely exceeded in the South Coast AQMD. NO_2 is formed from NO_X emissions, which also contribute to O_3. As a result, the majority of the future emission control measures will be implemented as part of the overall O_3 control strategy. Many of these control measures will target mobile sources, which account for more than three-quarters of California's NO_X emissions. These measures are expected to bring the South Coast AQMD into attainment of the state annual average standard. (Urban Crossroads, 2023a, pp. 31-32)

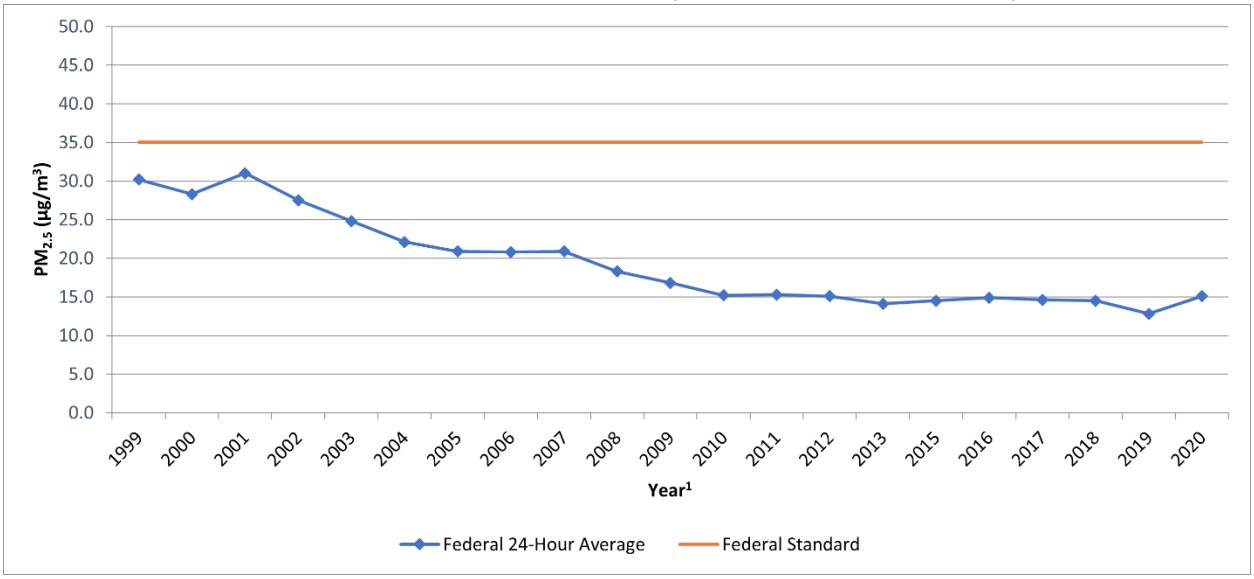
South Coast Air Basin Ozone Trend



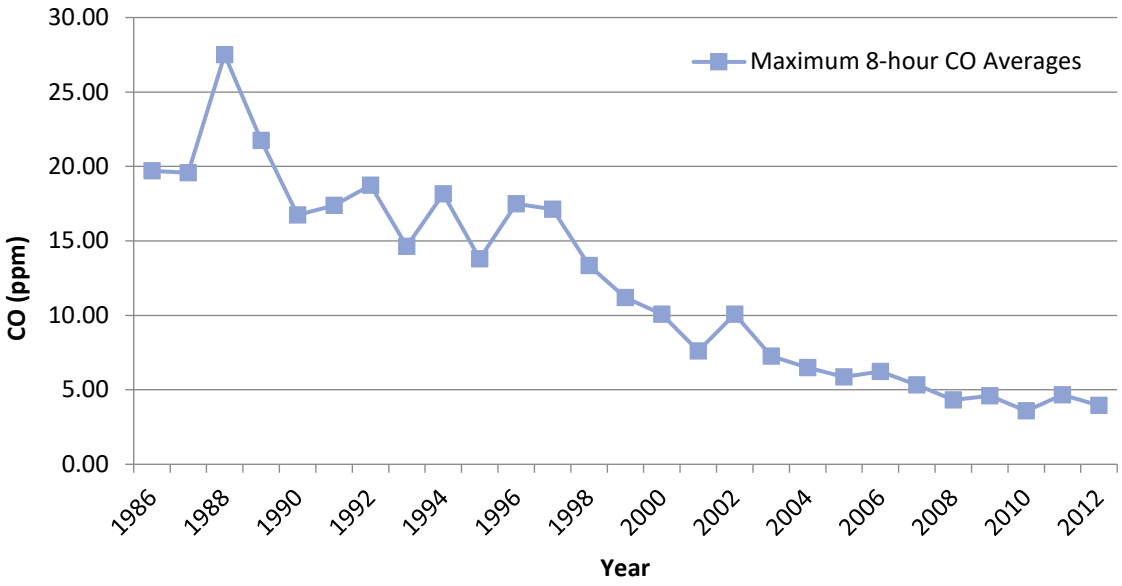
South Coast Air Basin PM_{10} Trend (based on Federal Standard)



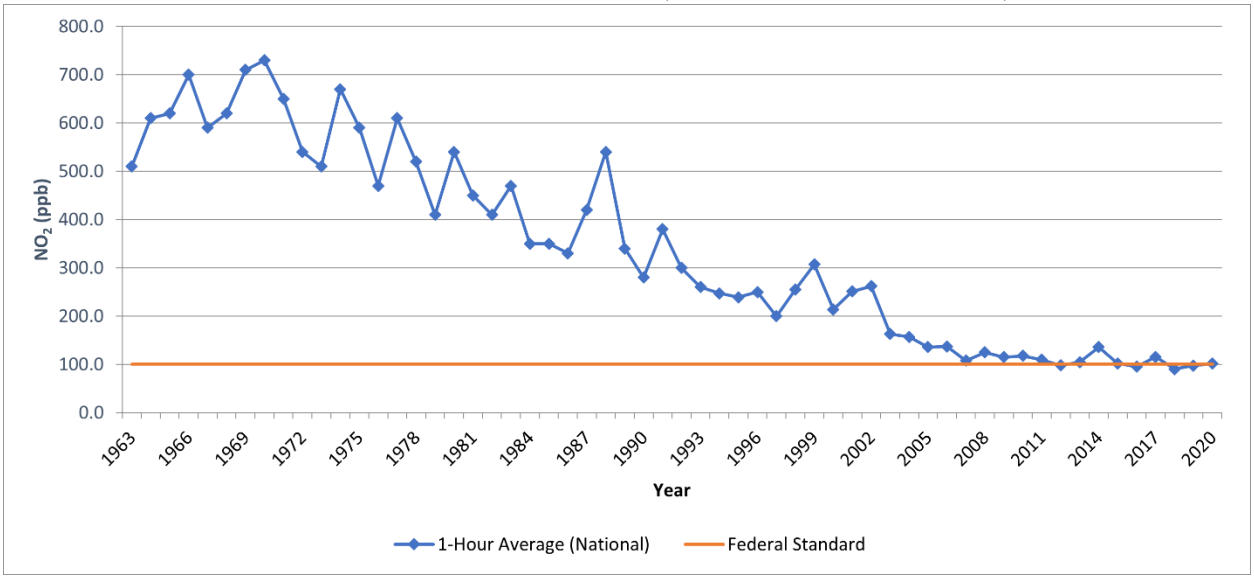
South Coast Air Basin $PM_{2.5}$ Trend (based on Federal Standard)



South Coast Air Basin Carbon Monoxide Trend



South Coast Air Basin NO_2 Trend (based on Federal Standard)



❑ Toxic Air Contaminants

Toxic air contaminants (TACs) are a classification of air pollutants that have been attributed to carcinogenic and non-carcinogenic health risks. In 1984, as a result of public concern for exposure to airborne carcinogens, the CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. According to the Ambient and Emission Trends of Toxic Air Contaminants in California journal article prepared for CARB, results show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly. The seven TACs studied include those that are derived from mobile sources: diesel particulate matter (DPM), benzene (C_6H_6), and 1,3-butadiene (C_4H_6); those that are derived from stationary sources: perchloroethylene (C_2Cl_4) and hexavalent chromium (Cr(VI)); and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH_2O) and acetaldehyde $(C_2H_4O)_2$. TAC data was gathered at monitoring sites from both the Bay Area and SCAB, as shown on Exhibit 2-A; several of the sites in the SCAB include Reseda, Compton, Rubidoux, Burbank, and Fontana. The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk. (Urban Crossroads, 2023a, p. 33)

CARB introduced two programs aimed at reducing mobile emissions for light- and medium-duty vehicles through vehicle emissions controls and cleaner fuel. In California, light-duty vehicles sold after 1996 are equipped with California's second-generation On-Board Diagnostic (OBD-II) system. The OBD-II system monitors virtually every component that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD-II system illuminates a warning lamp on the vehicle instrument panel to alert the driver. This warning lamp typically contains the phrase "Check Engine" or "Service Engine Soon". The system will also store important information about the detected malfunction so that a repair

technician can accurately find and fix the problem. CARB has recently developed similar OBD requirements for heavy-duty vehicles over 14,000 pounds (lbs). CARB's Phase II Reformulated Gasoline Regulation (RFG-2), adopted in 1996, also led to a reduction of mobile source emissions. Through such regulations, benzene levels declined 88% from 1990-2012. 1,3-Butadiene concentrations also declined 85% from 1990-2012 as a result of the use of reformulated gasoline and motor vehicle regulations. (Urban Crossroads, 2023a, p. 33)

In 2000, CARB's Diesel Risk Reduction Plan (DRRP) recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (<15 ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% since 2000, even though the state's population increased 31% and the amount of diesel vehicles miles traveled increased 81%, as shown on Exhibit 2-B. With the implementation of these diesel-related control regulations, CARB expected a DPM decline of 71% for 2000-2020. (Urban Crossroads, 2023a, p. 33)

- Diesel Regulations

The CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, the CARB Drayage Truck Regulation, the CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of "clean trucks" into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements. (Urban Crossroads, 2023a, p. 34)

Moreover, the average statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to the aforementioned regulatory requirements. Diesel emissions identified in this analysis would therefore overstate future DPM emissions since not all the regulatory requirements are reflected in the modeling. (Urban Crossroads, 2023a, p. 34)

- Cancer Risk Trends

Based on information available from CARB, overall cancer risk throughout the SCAB has had a declining trend since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a TAC. The South Coast AQMD initiated a comprehensive urban toxic air pollution study called the Multiple Air Toxics Exposure Study (MATES). DPM accounts for more than 70% of the cancer risk. (Urban Crossroads, 2023a, p. 34)

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, South Coast AQMD began conducting the MATES V Program. MATES V field measurements were conducted at ten fixed sites (the same sites selected for MATES III and IV) to assess trends in air toxics levels. MATES V also included measurements of ultrafine particles (UFP) and black carbon (BC) concentrations, which can be compared to the UFP levels measured in MATES IV. The final report

for the MATES V study was published August 2021. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. First, MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in South Coast AQMD's programs such as permitting, Air Toxics Hot Spots (AB2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic non-cancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. (Urban Crossroads, 2023a, p. 35)

MATES-V calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-V has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. The Project is located within a quadrant of the geographic grid of the MATES-V model which predicted a cancer risk of 634 in one million for the area containing the Project site. DPM is included in this cancer risk along with all other TAC sources. As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES V are 53% lower at the 10 monitoring sites compared to MATES IV. Cumulative Project generated TACs are limited to DPM. (Urban Crossroads, 2023a, p. 35)

3. Local Air Quality

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas (SRA)) throughout the district in order to provide Southern California residents about the air quality conditions. The Project site is located within the Southeast Los Angeles County area (SRA 5). There are no monitoring stations within SRA 5. Relative to the Project site, the nearest long-term monitoring site for CO, O_3, NO_2, and $PM_{2.5}$ is the South Coast AQMD South San Gabriel Valley monitoring station, located approximately 4.34 miles northeast of the Project site in SRA 11. As the South San Gabriel monitoring station does not include statistics for PM_{10}, the next nearest station was used. The South Coastal Los Angeles County monitoring station (SRA 4), located 5.41 miles southwest of the Project, is the next nearest monitoring station that reports air quality statistics for PM_{10}.

Table 4.1-3, *Project Area Air Quality Monitoring Summary 2019-2021*, provides a summary of ambient air quality conditions in the general vicinity of the Project site from 2019 to 2021, which is the most recent three-year period for which air quality information is available. Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

Table 4.1-3 Project Area Air Quality Monitoring Summary 2019-2021

Pollutant	Standard	Year		
		2019	2020	2021
O_3				
Maximum Federal 1-hour Concentration (ppm)	--	0.108	0.169	0.104
Maximum Federal 8-hour Concentration (ppm)	--	0.091	0.114	0.074
Number of Days Exceeding State 1-hour Standard	> 0.09 ppm	5	20	2
Number of Days Exceeding Federal/State 8-Hour Standard	> 0.070 ppm	7	23	3
CO				
Maximum Federal 1-hour Concentration	> 35 ppm	1.9	3.1	1.8
Maximum Federal 8-hour Concentration	> 20 ppm	1.5	1.7	1.5
NO_2				
Maximum Federal 24-hour Concentration	>0.100 ppm	0.062	0.069	0.072
Annual Federal Standard Design Value	--	0.018	0.018	0.018
PM_{10}				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	>150 ($\mu g/m^3$)	72	59	48
Annual Federal Arithmetic Mean ($\mu g/m^3$)	--	21.0	24.9	22.7
Number of Days Exceeding Federal 24-Hour Standard	> 150 ($\mu g/m^3$)	0	0	0
Number of Days Exceeding State 24-hour	> 50 ($\mu g/m^3$)	2	2	0
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 35 ($\mu g/m^3$)	29.60	35.40	66.00
Annual Federal Arithmetic Mean ($\mu g/m^3$)	> 12 ($\mu g/m^3$)	10.343	13.22	13.07
Number of Days Exceeding Federal 24-Hour Standard	> 35 ($\mu g/m^3$)	0	0	3

ppm = parts per million
($\mu g/m^3$) = micro gram per cubic meter
Source: (Urban Crossroads, 2023a. Table 2-4)

The Project site is currently developed with 249,579 sf of warehouse use. As part of the traffic analysis, existing counts were taken to determine activity at the site. As summarized in the Project's Focused Traffic Assessment (Appendix I1 of this Draft EIR), the existing warehouse generates 928 two-way trips per day. As such, existing emissions were calculated utilizing CalEEMod Version 2020.4.0. The emissions calculated are based on the existing trips as well as model defaults for area and energy source. The estimated operation-source emissions from the existing development are summarized on Table 4.1-4, *Emissions from Existing Development*. Detailed operation model outputs are presented in Appendix 3.3 of Appendix B1 of this Draft EIR.

Table 4.1-4 Emissions from Existing Development

Existing Development Operation Activities	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer Scenario						
Total Maximum Daily Emissions	8.82	32.49	35.51	0.28	16.15	4.70
Winter Scenario						
Total Maximum Daily Emissions	8.79	33.94	34.73	0.27	16.16	4.70

Source: (Urban Crossroads, 2023a. Table 3-8)

4.1.2 REGULATORY FRAMEWORK

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

1. Federal Regulations

❑ Federal Clean Air Act

The Federal Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement SIPs for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. (Urban Crossroads, 2023a, pp. 22-23)

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. Table 2-3 (previously presented) provides the NAAQS within the SCAB. (Urban Crossroads, 2023a, p. 23)

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_X. NO_X is a collective term that includes all forms of NO_X which are emitted as byproducts of the combustion process. (Urban Crossroads, 2023a, p. 23)

2. State Regulations

❑ California Air Resources Board (CARB)

The CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO_4, visibility, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). However, at this time, H_2S and C_2H_3Cl are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS. (Urban Crossroads, 2023a, p. 23)

Local air quality management districts, such as the South Coast AQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS. (Urban Crossroads, 2023a, p. 23)

Serious non-attainment areas are required to prepare AQMPs that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g. motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROGs, NO_X, CO and PM_{10}. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances. (Urban Crossroads, 2023a, p. 24)

❑ Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on August 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards which became effective January 1, 2023. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. (Urban Crossroads, 2023a, p. 24)

The Project will comply with the version of CALGreen standards in effect at the time building permits are sought.

4.1.3 METHODOLOGY

A. Project-Related Construction Emissions

On May 2021, the South Coast AQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod) version 2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. (Urban Crossroads, 2023a, p. 38)

❑ Construction Activities

Construction activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following construction activities: (Urban Crossroads, 2023a, p. 38)

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

The Project would include the demolition of 249,579 sf of existing building and 4,000 cubic yards of asphalt/concrete which would result in approximately 19,580.63 tons of debris. For purposes of

analysis, 11,480.63 tons of debris will be hauled off-site and would generate 1,135 two-way haul trips. The remaining 8,100 tons of debris will be crushed and used on-site. (Urban Crossroads, 2023a, p. 38)

The Project construction activities would include on-site crushing of asphalt/concrete pulverizing during demolition activity. Fugitive dust emissions would also be generated through the crushing of debris on-site. The EPA's AP-42 compilation of emission factors available in Chapter 11.19.2-2 were used to estimate fugitive dust from crushing activities. As noted above, it is estimated that approximately 4,000 cubic yards (8,100 tons of debris) would be crushed (405 tons per day). It is estimated that crushing activities would result in 0.22 lbs/day of PM_{10} emissions and 0.04 lbs/day of $PM_{2.5}$ emissions. (Urban Crossroads, 2023a, p. 38)

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions". Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The Project would require 28,150 cubic yards of import which would generate a total of 3,519 total two-way hauling trips (Urban Crossroads, 2023a, p. 39)

The Project would require approximately 11,130 cubic yards of concrete for concrete pour activities. Each truck can hold 35 cubic yards. For purposes of analysis, concrete pour activities would generate up to 636 total two-way hauling trips. (Urban Crossroads, 2023a, p. 39)

Construction generates on-road vehicle emissions from vehicle usage for workers, hauling, and vendors commuting to and from the site. The number of workers, vendor, and hauling trips are 374, 101, and 5,290, respectively. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the building construction phase. Vendor trips would likely occur during all phases of construction. It should be noted that as paving and architectural coating activities overlap with building construction, the vendor trips assigned to building construction activities are assumed the same trips used to cover paving and architectural coating. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. (Urban Crossroads, 2023a, p. 39)

- Construction Duration

For the purposes of evaluating the Project's construction-related air quality impacts, construction is expected to occur over a 12-month period. The Project would result in approximately 260 total working-days for construction activity. The construction schedule utilized in the analysis, shown in Table 4.1-5, *Construction Duration*, represents a "worst-case" analysis scenario should construction occur any time after the estimated construction start date, since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. The duration of construction activity was based on

information provided by the Project Applicant, CalEEMod defaults, and the 2022 opening year. (Urban Crossroads, 2023a, p. 40)

Table 4.1-5 Construction Duration

Phase Name	Days
Demolition	20
Site Preparation	10
Grading	30
Building Construction	200
Paving	20
Architectural Coating	40

Source: (Urban Crossroads, 2023a, Table 3-3)

❑ Construction Equipment

The construction equipment fleet was based on CalEEMod defaults and confirmed with the Project Applicant as being reasonable. A summary of construction equipment assumptions by phase is provided at Table 4.1-6, *Construction Equipment Assumptions*. (Urban Crossroads, 2023a, p. 40)

Table 4.1-6 Construction Equipment Assumptions

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

Source: (Urban Crossroads, 2023a, Table 3-4)

B. Construction Localized Pollutant Emissions

Localized emissions associated with Project-related construction activities were calculated and evaluated in accordance with South Coast AQMD's *Final Localized Significance Threshold Methodology* ("Methodology"). The South Coast AQMD has established that impacts to air quality are significant if there is a potential to contribute to or cause localized exceedances of the NAAQS and CAAQS. Collectively, these are referred to as Localized Significance Thresholds (LSTs). (Urban Crossroads, 2023a, p. 46)

For this Project, the appropriate SRA for the LST analysis is Southeast Los Angeles County (SRA 5). LSTs apply to CO, NO_X, PM_{10}, and $PM_{2.5}$. The South Coast AQMD produced look-up tables for projects less than or equal to 5 acres in size. In order to determine the appropriate methodology for determining localized impacts that could occur as a result of Project-related construction, the following process is undertaken: (Urban Crossroads, 2023a, p. 47)

- CalEEMod is utilized to determine the maximum daily on-site emissions that will occur during construction activity.
- The South Coast AQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds and CalEEMod User's Guide Appendix A: Calculation Details for CalEEMod is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.
- If the total acreage disturbed is less than or equal to five acres per day, then the South Coast AQMD's screening look-up tables are utilized to determine if a Project has the potential to result in a significant impact. The look-up tables establish a maximum daily emissions threshold in lbs/day that can be compared to CalEEMod outputs.
- If the total acreage disturbed is greater than five acres per day, then LST impacts are appropriately evaluated through dispersion modeling.
- The LST methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds.

South Coast AQMD's Methodology clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. (Urban Crossroads, 2023a, p. 49)

The South Coast AQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual and cumulatively significant impact. The nearest land use where an individual could remain for 24 hours to the Project site (in this case the

nearest residential land use) has been used to determine localized construction air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). As indicated on Figure 4.1-1, *Modeled Receptors*, the nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is location R3 which represents the existing residence at 5831 Ramon Court, approximately 79 feet east of the Project site. Receptor R3 is placed at the private outdoor living area (backyard).

As previously stated, and consistent with *LST* Methodology, the nearest industrial/commercial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at these sites for periods of one to 8 hours. The nearest receptor used for evaluation of localized impacts of NO_X and CO is represented by the B&F Cabinet facility located at 7320 Slauson Avenue, located approximately 11 feet (3 meters) west of the Project site.

It should be noted that the *LST Methodology* explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. As such a 25-meter receptor distance will be used for evaluation of localized PM_{10}, $PM_{2.5}$ NO_X, and CO.

C. Project Operational Emissions

Operational activities associated with the proposed Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from area source emissions, energy source emissions, mobile source emissions, and on-site equipment. For additional information regarding the calculation of Project operational emissions, please refer to Section 3.5 of the Project's Air Quality Impact Analysis (Appendix B1). (Urban Crossroads, 2023a, p. 42)

1. Area Source Emissions

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

- Architectural Coatings

Over a period of time the building that is part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using CalEEMod. (Urban Crossroads, 2023a, p. 42)

Source(s): Urban Crossroads (09-15-2021)

Figure 4.1-1

Not to Scale

Modeled Receptors

❑ Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form O_3 and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod. (Urban Crossroads, 2023a, p. 42)

❑ Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023a, p. 42)

2. Energy Source Emissions

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using CalEEMod. (Urban Crossroads, 2023a, p. 42)

3. Mobile Source Emissions

❑ Project Trip Generation Characteristics

The Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Information related to the Project's daily vehicle trip generation and trip characteristics was obtained from the Project's Focused Traffic Assessment (Appendix I1 to this EIR). The weekday and weekend trip generation rates used for this analysis are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (11^{th} Edition, 2021) for the proposed general light industrial (ITE Land Use Code 110) and warehousing uses (ITE Land Use Code 150).

To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed industrial land uses. For the proposed industrial uses, it is important to note that although the Focused Traffic Assessment does not break down passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-

Duty-Trucks (LDT1 & LDT2), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. See Table 3-6 of Appendix B1 for the passenger car fleet mix.

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the South Coast AQMD recommended truck trip length of 40 miles and an assumption of 100% primary trips for the proposed industrial land uses. Trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided in the focused Traffic Assessment. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1 & LHDT2)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. See Table 3-7 of Appendix B1 for the truck fleet mix.

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of break and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod.

4. On-Site Cargo Handling Equipment Emissions

It is common for industrial warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of equipment that receive and distribute containers. For purposes of analysis, it is assumed that the Project would require on-site operational equipment of up to one (1) 200 horsepower (hp), compressed natural gas or gasoline-powered tractors/loaders/backhoes operating at 4 hours a day for 365 days of the year. (Urban Crossroads, 2023a, p. 44)

D. Operational Localized Emissions

The LST methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the project-site boundary. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required. (Urban Crossroads, 2023a, p. 52)

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

and five percent (5%) of the Project-related mobile sources. Considering that the trip length used in CalEEMod for the Project is approximately 16.6 miles for passenger cars and 40.00 miles for all trucks, 5% of this total would represent an on-site travel distance of approximately 0.8 miles for passenger cars and 2 miles for trucks. (Urban Crossroads, 2023a, p. 53)

E. Heath Risk Assessment Methodology

TAC emissions were calculated using the following models: CARB's California Emissions Factor Model, Version 2017 (EMFAC2017) for vehicle DPM PM_{10} emissions, the United States Environmental Protection Agency's (EPA) AERMOD air dispersion model to determine DPM concentrations by estimating source specific inputs, South Coast AQMD's thresholds for emissions of TACs which are considered significant risk, and OHHEA's Reference Exposure Level (REL) for an evaluation of the potential noncarcinogenic effects of chronic exposures. Refer to Section 2 of the Project's *Health Risk Assessment* (Appendix B2) for a detailed description of HRA methodologies and for the model inputs and equations used in the estimation of the Project-related TAC emissions.

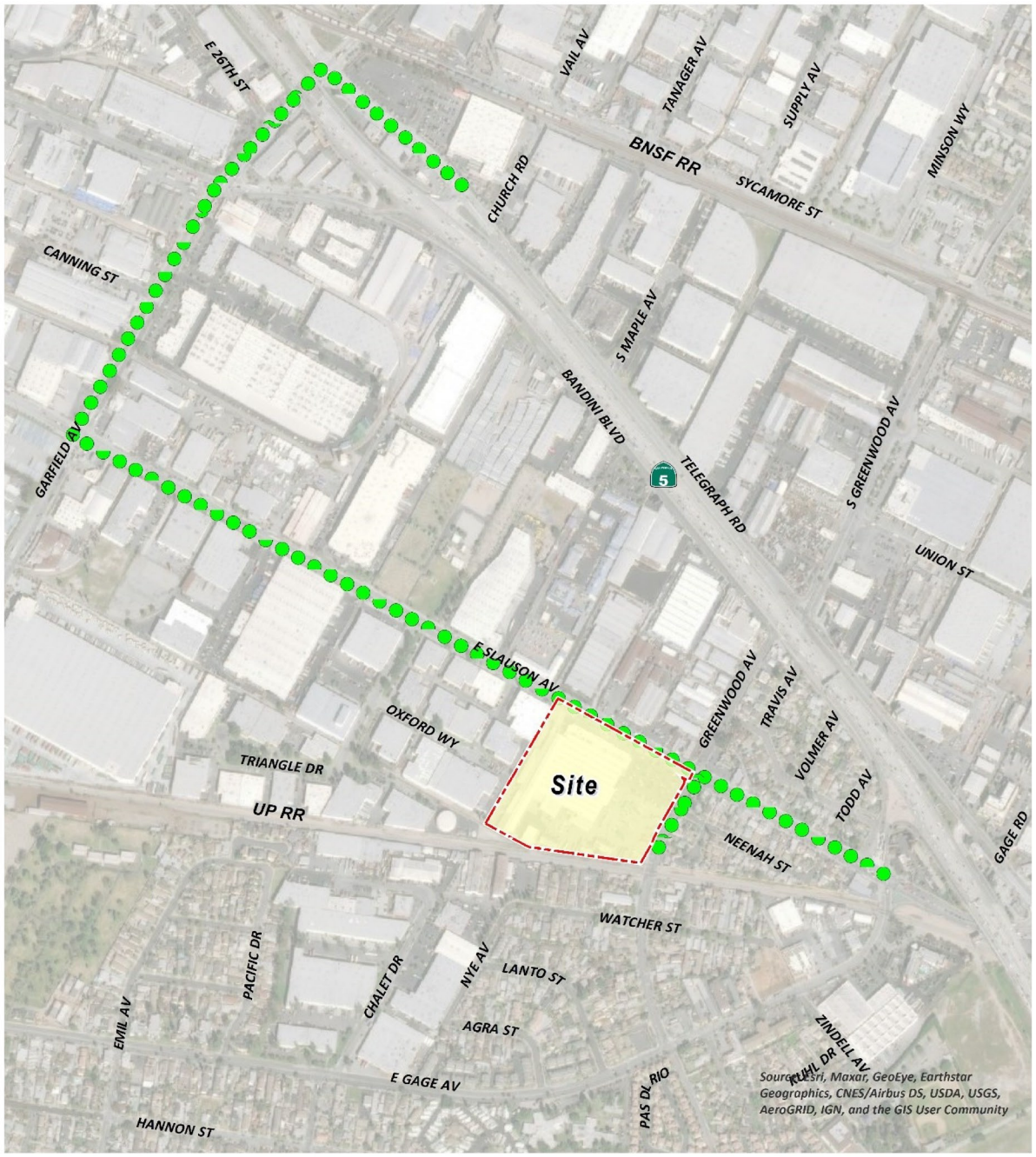
The modeled emission sources are illustrated on Figure 4.1-2, *Modeled Onsite Emissions* Sources, and *Figure 4.1-3. Modeled Offsite Emissions Sources*. The modeled truck travel routes included in the HRA are based on the truck trip distributions (inbound and outbound) available from the Project's Traffic Assessment appended to this EIR at Appendix I1. The modeled truck route is consistent with the trip distribution patterns identified in Appendix I1, is supported by substantial evidence, and was modeled to determine the potential impacts to sensitive receptors along the primary truck routes. The modeling domain is limited to the Project's primary truck route and includes off-site sources in the study area for more than 0.75 mile. This modeling domain is more inclusive and conservative than using only a 0.25-mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential risks occur within a 0.25 mile of the primary source of emissions (in the case of the Project, the primary source of emissions is the on-site idling and travel). (Urban Crossroads, 2023b, p. 16)

Source(s): Urban Crossroads (01-20-2022)

Figure 4.1-2

Not to Scale

Modeled Onsite Emissions Sources



Source(s): Urban Crossroads (01-20-2022)

Figure 4.1-3

Not to Scale

Modeled Offsite Emissions Sources

4.1.4 BASIS FOR DETERMINING SIGNIFICANCE

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

a. *Would the Project conflict with or obstruct implementation of the applicable air quality plan?*
b. *Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*
c. *Would the Project expose receptors to substantial pollutant concentrations?*
d. *Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?*

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

Table 4.1-7 Maximum Daily Regional Emissions Thresholds

Pollutant	Construction Regional Threshold (lbs/day)	Operational Regional Threshold (lbs/day)
NOx	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SOx	150	150
CO	550	550
Pb	3	3

Source: (Urban Crossroads, 2023a, Table 3-1)

Table 4.1-8 Maximum Daily Localized Construction Emissions Thresholds

Pollutant	Construction Localized Thresholds
NO_x	172 lbs/day
CO	1,480 lbs/day
PM_{10}	14 lbs/day
$PM_{2.5}$	7 lbs/day

Source: (Urban Crossroads, 2023a, Table 3-10)

For operational activities, the threshold values presented in Table 4.1-9, *Maximum Daily Localized Operational Emissions Thresholds*, are from the look-up tables at 5 acres and a 165-meter distance for localized PM_{10} and $PM_{2.5}$ evaluation and a 25-meter receptor distance for localized NO_X and CO evaluation.

Table 4.1-9 Maximum Daily Localized Operational Emissions Thresholds

Pollutant	Construction Localized Thresholds
NO_x	172 lbs/day
CO	1,480 lbs/day
PM_{10}	4 lbs/day
$PM_{2.5}$	2 lbs/day

Source: (Urban Crossroads, 2023a, Table 3-12)

4.1.5 IMPACT ANALYSIS

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

The South Coast AQMD's 2022 AQMP is the applicable air quality plan for the Project area, which estimates long-term air quality conditions for the SCAB. The air quality conditions presented in the 2022 AQMP are based in part on the growth forecasts identified by Southern California Association of Governments (SCAG) in its 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is a regional transportation and housing plan that transcends jurisdictional boundaries. The RTP/SCS anticipates that development in the various incorporated and unincorporated areas within the SCAB will occur in accordance with the adopted general plans for these areas. In addition, the air quality conditions presented in the 2022 AQMP are based on the assumption that future development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. Accordingly, if a proposed project is consistent with these growth forecasts, and if available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is considered to be consistent with the 2022 AQMP.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below: (Urban Crossroads, 2023a, p. 56)

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

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if LSTs or regional significance thresholds were exceeded. As evaluated under Thresholds b) and c) below, the Project's regional and localized construction-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected without mitigation. (Urban Crossroads, 2023a, p. 56)

As evaluated under Thresholds b) and c) below, the Project would not exceed the applicable regional significance thresholds and LST thresholds for operational activity. Therefore, the Project would not conflict with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 56)

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

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

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the Commerce 2020 General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2023a, p. 56)

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result. (Urban Crossroads, 2023a, pp. 56-57)

Per the Commerce 2020 General Plan, the Project site is designated for Industrial uses. In addition, the Project site is zoned Heavy-Industrial (M-2) As previously stated, the purpose of this designation and zone is to provide land suitable for heavy industrial uses. The requirements of the designation and zone are intended to provide safeguards and to establish adequate buffer distances between uses that pose potentially adverse public health, safety, and welfare impacts and land uses in adjacent, more

restrictive zone districts. The proposed Project is to consist of warehousing use, which is consistent with the General Plan land use designation, zoning and intensity. For the purposes of this analysis, the Project has been evaluated assuming 118,466 sf of general light industrial use (40% of the total building) and 177,700 sf of warehouse use (60% of the total building). Additionally, the Project's construction and operational-source air pollutant emissions would not exceed the regional or localized significance thresholds.

The Project would not result in or cause NAAQS or CAAQS violations. The proposed Project is consistent with the land use and growth intensities reflected in the Commerce 2020 General Plan. Furthermore, the Project would not exceed any applicable regional or local thresholds. As such, the Project is therefore considered to be consistent with the AQMP and impacts would be less than significant. (Urban Crossroads, 2023a, p. 57)

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

A. Construction Emissions Impact Analysis

South Coast AQMD Rules that are currently applicable during construction activity for this Project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). (Urban Crossroads, 2023a, p. 2)

The estimated maximum daily construction emissions without mitigation are summarized on Table 4.1-10, *Maximum Daily Peak Construction Emissions Summary*. Emissions resulting from the Project construction will not exceed criteria pollutant thresholds established by the South Coast AQMD for emissions of any criteria pollutant. (Urban Crossroads, 2023a, p. 41). Therefore, a less than significant impact would occur.

Table 4.1-10 Maximum Daily Peak Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
Summer						
2024	41.20	54.76	46.31	0.14	11.04	5.72
Winter						
2024	41.28	55.46	45.48	0.14	11.04	5.72
Maximum Daily Emissions	**41.28**	**55.46**	**46.31**	**0.14**	**11.04**	**5.72**
South Coast AQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023a, Table 3-5)

B. Operational Emissions Impact Analysis

CalEEMod utilizes summer and winter EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. As such, operational activities for summer and winter scenarios are presented in Table 4.1-11, *Summary of Operational Emissions*. The existing development emissions (previously presented in Table 4.1-4) were subtracted from the Project operational emissions to determine the new emissions from the proposed Project. Detailed operational model outputs are presented in Appendix 3.2 in Appendix B1 of this EIR. As indicated, Project operation-source emissions would not exceed the South Coast AQMD regional thresholds of significance for any criteria pollutants. Therefore, impacts would be less than significant.

Table 4.1-11 Summary of Operational Emissions

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area Source	6.76	1.01E-03	0.11	1.00E-05	4.00E-04	4.00E-04
Energy Source	0.07	0.61	0.51	3.68E-03	0.05	0.05
Mobile Source	3.15	26.95	36.22	0.20	12.16	3.45
On-Site Equipment Source	0.11	0.97	0.75	3.17E-03	0.04	0.03
Total Maximum Daily Emissions	10.08	28.54	37.59	0.20	12.24	3.53
Existing Emissions	8.82	32.49	35.51	0.28	16.15	4.70
Net Emissions (Project – Existing)	1.26	-3.95	2.08	-0.07	-3.91	-1.17
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Operational Activities – Winter Scenario	**Emissions (lbs/day)**					
	VOC	**NOx**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area Source	6.76	1.01E-03	0.11	1.00E-05	4.00E-04	4.00E-04
Energy Source	0.07	0.61	0.51	3.68E-03	0.05	0.05
Mobile Source	3.10	28.19	35.32	0.19	12.16	3.45
On-Site Equipment Source	0.11	0.97	0.75	3.17E-03	0.04	0.03
Total Maximum Daily Emissions	10.03	29.77	36.70	0.20	12.24	3.53
Existing Emissions	8.79	33.94	34.73	0.27	16.15	4.70
Net Emissions (Project – Existing)	1.25	-4.17	1.97	-0.07	-3.91	-1.17
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023a, Table 3-9)

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

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR's air quality analysis must meaningfully connect the identified air

quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the South Coast AQMD in the Friant Ranch case (Brief), South Coast AQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. (Urban Crossroads, 2023a, p. 57)

The South Coast AQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk--it does not necessarily mean anyone will contract cancer as a result of the Project. The Brief also cites the author of the CARB methodology, which reported that a $PM_{2.5}$ methodology is not suited for small projects and may yield unreliable results. Similarly, South Coast AQMD staff does not currently know of a way to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful. (Urban Crossroads, 2023a, p. 58)

On the other hand, for extremely large regional projects (unlike the proposed Project), the South Coast AQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs/day of NO_X and 89,180 lbs/day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3. (Urban Crossroads, 2023a, p. 58)

The proposed Project does not generate anywhere near 6,620 lbs/day of NO_X or 89,190 lbs/day of VOC emissions. The proposed Project would generate 55.53 lbs/day of NO_X during construction and 28.10 lbs/day of NO_X during operations (0.84% and 0.42% of 6,620 lbs/day, respectively). The Project would also generate 66.48 lbs/day of VOC emissions during construction and 10.07 lbs/day of VOC emissions during operations (0.07% and <0.01% of 89,190 lbs/day, respectively). Therefore, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level. (Urban Crossroads, 2023a, p. 58)

Notwithstanding, this analysis does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ by comparing the proposed Project's on-site emissions to the South Coast AQMD's applicable LST thresholds. As shown below, the proposed Project would not result in emissions that exceeded the South Coast AQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$. (Urban Crossroads, 2023a, p. 58)

C. Construction Localized Emissions Impact Analysis

Table 4.1-12, *Localized Significance Summary - Construction*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. For analytical purposes, emissions associated with peak demolition/crushing, site preparation, and grading activities are considered for purposes of LSTs since these phases represents the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. Localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. . (Urban Crossroads, 2023a, p. 51)

Accordingly, construction of the proposed Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations. Therefore, localized emissions from Project construction would be less than significant.

Table 4.1-12 Localized Significance Summary - Construction

On-Site Demolition/Crushing Emissions	Emissions (lbs/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	23.67	24.03	9.26	2.26
South Coast AQMD Localized Threshold	172	1,480	14	7
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
On-Site Site Preparation Emissions	**Emissions (lbs/day)**			
	NOx	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	40.32	18.18	10.81	5.66
South Coast AQMD Localized Threshold	172	1,480	14	7
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
On-Site Grading Emissions	**Emissions (lbs/day)**			
	NOx	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	38.95	27.64	6.03	2.97
South Coast AQMD Localized Threshold	172	1,480	14	7
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023a, Table 3-11)

2. Toxic Air Contaminants Impact Analysis

As indicated in Figure 4.1-1 above, the land use with the greatest potential exposure to Project construction DPM source emissions is Location R4 which is located approximately 91 feet south of the Project site at an existing residence located at 7015 Watcher Street. R4 is placed at the private outdoor living area (backyard) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated at 6.43 in one million, which is less than the South Coast AQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location.

D. Operation Localized Emissions Impact Analysis

1. Criteria Pollutant Emissions

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

Table 4.1-13 Localized Significance Summary – Operation

Operational Activity	Emissions (lbs/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	1.92	2.48	0.40	0.16
South Coast AQMD Localized Threshold	172	1,480	4	2
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023a, Table 3-13)

2. CO Hot Spot Impact Analysis

The Project would not result in potentially adverse CO concentrations or "hot spots." Further, detailed modeling of Project-specific CO "hot spots" is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the South Coast AQMD's CEQA Air Quality Handbook (1993) (1993 CEQA Handbook), the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. (Urban Crossroads, 2023a, p. 53)

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment. (Urban Crossroads, 2023a, p. 54)

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards.

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, an 8.4 ppm 8-hr CO concentration was measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO generating intersection within the "hot spot" analysis), but only 0.7 ppm was attributable to the traffic volumes

and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur.

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 1.8 ppm and 1.5 ppm, respectively (data from South San Gabriel Valley station for 2021). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm) . (Urban Crossroads, 2023a, pp. 54-55)

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

3. Toxic Air Contaminants Impact Analysis

Residential Exposure Scenario

The proposed truck trailer loading dock area is located at the southern end of the Project site. Therefore, as indicated in Figure 4.1-1 above, the residential land use with the greatest potential exposure to Project DPM source emissions is Location R4, which represents an existing residential home located at 7015 Watcher Street, approximately 91 feet south of the Project site. R4 is placed at the private outdoor living area (backyard) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 1.04 in one million, which is less than the South Coast AQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the scenario analyzed herein, and TACs generally dissipate with distance from the source, all other residential receptors in the vicinity of the Project would be exposed to less emissions

and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences. (Urban Crossroads, 2023b, p. 25.)

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is Location R6, which represents the adjacent potential worker receptor approximately 11 feet west of the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact at this location is 0.15 in one million which is less than the South Coast AQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the scenario analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers. (Urban Crossroads, 2023b, p. 25)

School Child Exposure Scenario

Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on CARB and South Coast AQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center.

The 1,000-foot evaluation distance is supported by research-based findings concerning Toxic Air Contaminant (TAC) emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources.

A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above.

There are no schools located within a 0.25 mile (1,320 feet) of the Project site. The nearest school is Suva Elementary School, which is located approximately 3,980 feet northeast of the Project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than 0.25 mile from the air pollution source, no significant impacts would occur to any schools in the vicinity of the Project. (Urban Crossroads, 2023b, pp. 25-26)

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

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the

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

The Project does not contain land uses typically associated with emitting objectionable odors, such as agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The proposed Project would also be required to comply with South Coast AQMD Rule 402 to prevent occurrences of public odor nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required. (Urban Crossroads, 2023a, p. 59)

4.1.6 CUMULATIVE IMPACT ANALYSIS

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

As discussed above in the response to Threshold a, the CAAQS designates the Project site as nonattainment for O_3, PM_{10}, and $PM_{2.5}$ while the NAAQS designates the Project site as nonattainment for O_3 and $PM_{2.5}$. According to the South Coast AQMD, projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. The proposed Project would not exceed the Project-specific significance thresholds. Therefore, impacts with regard to Threshold a would not be cumulatively considerable.

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

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

As previously shown on Table 4.1-12, *Localized Significance Summary - Construction*, emissions would not exceed the South Coast AQMD Localized Threshold for CO, NO_x, PM_{10}, or $PM_{2.5}$. Pursuant to the South Coast AQMD's CEQA Air Quality Significance Thresholds, projects with daily emissions

that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant impact; therefore, the Project's emissions during construction would be less than significant on Project-level and cumulative basis.

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

Construction and operation of the Project would not emit airborne TACs at concentrations that would pose a significant health risk (including acute and carcinogenic health risks) to nearby sensitive receptors. Accordingly, long-term operation of the Project would not expose nearby sensitive receptors to substantial localized pollutant concentrations, and a cumulatively considerable impact would not occur.

The Project does not involve any uses that would produce substantial amounts of odors. Mandatory compliance with applicable regulatory requirements (i.e. South Coast AQMD Rule 402) would ensure that operational-related odors would be minimized. Construction-related odors would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than cumulatively-considerable. The Project and cumulative developments in the surrounding areas would be required to comply with South Coast AQMD Rule 402, which would ensure that long-term operational odor impacts are less than cumulatively-considerable.

4.1.7 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. The Project would not result in or cause NAAQS or CAAQS violations. The proposed Project is consistent with the land use and growth intensities reflected in the Commerce 2020 General Plan. Furthermore, the Project would not exceed any applicable regional or local thresholds. As such, the Project is therefore considered to be consistent with the AQMP and a less than significant impact is expected.

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

Threshold c: Less-than-Significant Impact. Project emissions during construction and operation would not exceed the South Coast AQMD's LSTs for CO, NO_X, PM_{10}, or $PM_{2.5}$. Non-cancer risks would also

be below the South Coast AQMD's threshold for direct and cumulatively considerable emissions and would be less than significant. Emissions also would not exceed LSTs and would not cause or contribute to a CO "Hot Spot."

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

4.1.8 MITIGATION

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

4.1.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts would be less than significant.

4.2 CULTURAL RESOURCES

The analysis in this Subsection is based on a site-specific cultural resources assessment report titled "*Cultural Resources Study for the 7400 East Slauson Avenue Project*" prepared by Brian F. Smith and Associates, Inc. (BFSA) dated February 16, 2023. (BFSA, 2023a) The report is included as Appendix C, to this EIR.

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

4.2.1 EXISTING CONDITIONS

A. Cultural Setting

The Project site is currently developed with six commercial and industrial buildings, four of which are of historic-age, as they were constructed 50 or more years ago. The Project site was previously impacted by the development of the structures and associated landscape, as well as the general development of the area over the past 100 years. The Project site is located within the Central Basin of the Larger Los Angeles Basin, a large structural, sedimentary basin bounded and cut through by several active fault systems within the Los Angeles Metropolitan area. The following subsections summarize the cultural setting of the Project area.

1. Prehistoric Period Setting

- "Los Angeles Man" and the Early Holocene Period (circa 26,000 to 9,000 Years Before Present [YBP]). The oldest directly dated human remains from coastal California are those of the "Los Angeles Man." These remains were dated to 26,000 YBP, although modern scientific dating has determined this number may be inaccurate. Evidence of prehistoric human remains during the early Holocene period has been increasing on Santa Rosa Island, San Miguel Island, and San Clemente Island. This evidence suggests that archaeological sites associated with this period along coastal southern California were probably destroyed or obscured by sea level advancement or sedimentation.

- Middle Holocene Period (circa 8,000 to 5,000 YBP). Evidence suggests that after sea levels stabilized, around 7,000 YBP, a variety of depositional events were created that reshaped the landscape on which inhabitants were living. Human adaptations during the middle Holocene in the Los Angeles Basin are predominantly characterized by an abundance of grinding implements. Other characteristics of this period include stone ornaments, large projectile points, and charm stones, while bone and shell tools, ornamentation, and trade items are still rare.

- Late-Middle Holocene Period (circa 5,000 to 3,350 YBP). During the later part of the middle Holocene mortars and pestles became common, suggesting acorns became an important part of the prehistoric diet in southern California. Sites from this time period may also produce large stemmed, leaf-shaped and side-notched points, basket-hopper mortars, a variety of stone tools, bone tools, and shell ornamentation. Economies diversified with coastal communities focusing on exploiting the ocean while inland communities focused on hunting land mammals. Trade goods become more common during this period and villages appear to have been more permanent than earlier points.

- Late Holocene or Late Horizon/European Contact (circa 3,350 YBP to 1790). During the late Holocene, population size and density increased dramatically, calling for an even more diversified economy. Ethnographic data collected from early Spanish explorer indicates that the Gabrielino/Tongva tribe was the most established tribe in the Project area. Gabrielino territory included the watersheds of San Gabriel, Santa Ana, and Los Angeles rivers, portions of the Santa Monica and Santa Ana mountains, the Los Angeles basin, the coast from Aliso Creek to Topanga Creek, and San Clemente, San Nicolas, and Santa Catalina islands. Evidence suggests that the Gabrielino were hunters and gatherers whose food sources included acorns, seeds, marine mollusks, fish, and mammals; archeological sites will often feature evidence of hunting, gathering, processing, and storage implements including arrow points, fishhooks, scrapers, grinding stones, and basketry awls. Arrival of the Spanish drastically changed life for the Gabrielino. In the early 1860s, a smallpox epidemic nearly wiped out the remaining Gabrielino population. People of Gabrielino descent still live in the Los Angeles area, but Gabrielino people are no longer listed as a culturally identifiable group as of the 1900 Federal Census.

2. Historic Setting

The Project site was used for agricultural purposes through the 1940s. The 1928 and 1938 aerial photographs show the Project site as agricultural land. The 1947 aerial photograph shows two structures with associated roads within the Project site, which were removed by 1949. There are no Sanborn maps or city directories for the area during this time and the occupants and function of the structures are unknown. Additionally, while development of the surrounding area is well documented, on the 1896, 1923, 1936, and 1952 USGS maps, the Project site is shown as vacant.

Development of the Project site began in 1951 and 1952. The commercial sales and service building was constructed in 1951 and the industrial auxiliary building and commercial office/warehouse building was opened by Baker Oil Tool Company, Inc. (founded by Reuben Carlton “Carl” Baker, Sr. by 1930) on April 18, 1952. Baker was born on July 18, 1872 in Purcellville, Virginia. By 1894, he had moved to the west coast and was working hauling oil at the Los Angeles City Oil Field, where he eventually became an independent oil drilling contractor. He returned home to bring his childhood sweetheart, Minnie Myrtle Zumwalt, to Los Angeles. On December 12, 1897, the two were married in Shasta County. The Bakers lived in Los Angeles until 1899, when they moved to Coalinga for a drilling contract.

In 1913, Baker established the Baker Casing Shoe Company so that he could hold his patents and collect royalties. By 1918, he decided to leave the oil drilling business and purchased a machine shop in Coalinga, focusing upon leasing machinery and developing improvements on drilling tools. In 1924, he purchased a vacant yard at 803-807 East Slauson Avenue and moved the Baker Casing Shoe Company to Huntington Park, Los Angeles County. By 1930, he changed the name of the Baker Casing Shoe Company to the Baker Oil Tool Company, and it was located at 2951-2971 East Slauson Avenue. At that time, the Bakers were still living in Coalinga, but would move back to Los Angeles in 1935.

The Baker Oil Tool Company moved to 7400 East Slauson Avenue on April 18, 1952. A new manufacturing plant/warehouse and office building (recorded as P-19- 190301) was constructed that year for the manufacture of Baker oil tools and three auxiliary buildings were present along the southern property boundary. On September 29, 1957, Baker passed away. In 1976, the company name changed to Baker International and by 1987 had acquired the Hughes Tool Company, becoming Baker Hughes. Baker Oil Tools, Inc. occupied the subject property until 1983, when Norbert Gehr of the Gehr Group purchased the property.

Since the construction of the original commercial warehouse/office building at 7400 East Slauson Avenue in 1952, several changes have been made. Between 1952 and 1956, modifications were made to the East Slauson Avenue facade of the commercial warehouse/office building and an industrial auxiliary building was constructed. Also, by 1956, three additional auxiliary buildings had been constructed along the southern property border.

Between 1956 and 1960, the roofline on the northwest facade of the commercial warehouse/office building was expanded. According to aerial photographs, sometime between 1977 and 1983, additions were constructed on the northwest and southwest facades of the warehouse portion of the building and a new industrial auxiliary building was constructed along the southern property border, between the 1951 commercial sales and service building and the 1952 to 1956 industrial auxiliary building. Between 1983 and 1988, the warehouse/office building roofline was extended along the northwest facade and the loading dock was expanded on the southwest facade. According to aerial photographs, between 1994 and 2003, another addition was constructed onto the warehouse/office building along the southwest property border. In 2016, five of the buildings constructed in the 1950s along the southern property border were demolished and in 2019, the sixth was demolished. In 2020, a new building was constructed in place of the six 1950s buildings. Figure 4.2-1, *2020 Aerial Photograph – All Buildings and Additions*, shows all of the alterations and structure additions made to the property on a 2020 aerial photograph.

Source(s): Brian F. Smith and Associates (06-14-2021)

Figure 4.2-1

Not to Scale

2020 Aerial Photograph – All Buildings and Additions

B. South Central Coastal Information Center (SCCIC) Findings

An archeological records search was performed by BFSA for the Project at the SCCIC at CSU Fullerton in order to assess previous archaeological studies and identify any previously recorded archaeological sites within the Project boundaries or in the immediate vicinity. SCCIC records indicated that 12 resources have been recorded within one mile of the Project site, one of which is recorded within the Project site (P-19-190301, a historic commercial building) (see Subsection 4.2.4, *Impact Analysis*).

4.2.2 REGULATORY FRAMEWORK

1. California Register of Historical Resources

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

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

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

2. California Environmental Quality Act

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

1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the CRHR (Public Resources Code [PRC] SS5024.1, Title 14 CCR. Section 4850 et seq.).

2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant.

Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC SS5024.1, Title 14, Section 4852) including the following:

    a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    b) Is associated with the lives of persons important in our past;

    c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

    d) Has yielded, or may be likely to yield, information important in prehistory or history.

4) The fact that a resource is not listed in, or determined eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the PRC), or identified in a historical resources survey (meeting the criteria in Section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or 5024.1.

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

1) Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

2) The significance of a historical resource is materially impaired when a project:

    a) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or,

c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

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

1. When a project will impact an archaeological site, a lead agency shall first determine whether the site is a historical resource, as defined in subsection (a).

2. If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.

3. If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC Section 21083.2 (c to f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

4. If an archaeological resource is neither a unique archaeological nor historical resource, the effects of the project upon those resources shall not be considered a significant effect upon the environment. It shall be sufficient that both the resource and the effect upon it are noted in the Initial Study (IS) or Environmental Impact Report, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

3. California Public Resources Code

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

- **California Public Resources Code 5020–5029.5** continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees

the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

- **California Public Resources Code 5079–5079.65** defines the functions and duties of the OHP. The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

- **California Public Resources Code 5097.5** prohibits a person from moving, destroying, injuring, or defacing, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

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

4.2.3 Basis for Determining Significance

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

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

b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5; and/or*

c. *Disturb any human remains, including those interred outside of formal cemeteries.*

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

4.2.4 IMPACT ANALYSIS

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

A. CRHR Evaluation

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

> **CRHR Criterion 1:** *It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
>
> The 7400 East Slauson Avenue property was developed by Baker Oil Tool Company, which was founded by Rueben Carlton Baker in 1951 during the post-World War II period. This period is characterized by the continuing expansion of industrial production, especially in the field of aerospace and aviation. On the other hand, shortly after the construction of Baker's facility, the oil industry started to decline. Although Baker was a significant individual in the history of the oil boom period in the city of Coalinga, the 7400 East Slauson Avenue property is not associated with any of Baker's early inventions or the oil boom period. The property was developed by Baker Oil Tool Company long after the company had been established and was not the location of any known significant events. Additionally, although the Modernism Context Statement considers resources related with oil and petroleum products to be significant, importance is given to the "Oil Boom" period of the late nineteenth and early twentieth centuries, and the only type of properties listed under this theme that might be considered significant are oil pump jacks. While the property can be considered significant under the "Industrial Design and Engineering" theme due to Baker's many inventions, these also took place before the construction of the facility at 7400 East Slauson Avenue property.
>
> The property is also associated with Norbert Gehr, an important manufacturer and the owner of the Gehr Group. However, the property's association with Norbert Gehr and the Gehr Group also occurred many years after the Gehr Group was established. The property best associated with the company and Norbert Gehr himself would be his original 1975 plant. Additionally, although the Modernism Context Statement considers resources associated with mass manufacturing to be significant, importance is given to the buildings related to food processing, garments and textiles, and automobile production industries. Since Gehr manufactured wire and cable products, his contribution cannot be considered significant under these themes. Because the buildings could not be associated with any specific historic event and are not the buildings best associated with Baker Tool Company, the Gehr Group, or their founders, they are not eligible for designation under CRHR Criterion 1.

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

Historical research revealed none of the buildings within the 7400 East Slauson Avenue property could be associated with any persons important in our past. Therefore, the buildings are not eligible for designation under CRHR Criterion 2.

CRHR Criterion 3: *It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.*

1952 Commercial Office/Warehouse Building: This building was previously recorded as Site P-19-190301. The Streamline Moderne- and International-style office and Utilitarian Industrial-style warehouse building was constructed in 1952. Currently, the City of Commerce does not have a historic context statement that addresses Modern architecture and the most relevant context statement is the SurveyLA Los Angeles Citywide Historic Context Statement: L.A. Modernism (Modernism Context Statement), which was developed and implemented in August 2021. The stated purpose of the Modernism Context Statement is to "provide guidance to field surveyors and others in identifying and evaluating potential historic resources relating to styles of Modern architecture" and was created to better understand "numerous examples of properties designed in architectural styles associated with L.A. Modernism". The City of Los Angeles utilizes the Modernism Context Statement in conjunction with the evaluation of potential historic resources constructed within the Modern era from 1919 to 1980, as these were primarily designed in the Corporate International and Contemporary styles within that period of time, as identified in the Modernism Context Statement.

According to the Context Statement, the Corporate International style is derived from the postwar Modernism that was used in the design and construction of large-scale commercial office buildings and government facilities. Also referred to as the Corporate Modernism style, it became the dominant style in corporate architecture between the 1950s and 1970s. The period of significance for this style is defined as the period between 1949 and 1975. The rise of this style's popularity is attributed to the economic growth and increasing importance of American corporations during the postwar period. Many of the buildings constructed in this style adopted an architectural vocabulary that would convey their forward-looking attitudes and cutting-edge innovations. This was achieved through an adaptation of the International Style. The steelframe construction, open floor plans, and modular forms were adapted to design the high-rise buildings. Following the principles of the International Style, all ornament was removed during the design of the buildings. The Corporate International Style architecture was defined by a distinctive catalog of features, including simple geometries and box-shaped forms, flat roofs (with or without parapets), taut wall surfaces, steel and concrete structural systems, and glass curtain walls comprising bands of flush-mounted metal windows and spandrel panels. To further achieve the

polished image of the corporations, these buildings made frequent use of the technology, and especially used glass curtain wall construction. These corporate buildings also featured landscaped areas that complemented the architecture. The large-scale buildings of this style were usually designed by large and prolific architecture firms that took on large-scale commissions.

According to the Modernism Context Statement, there are eight character-defining features of Corporate International construction. When evaluated under the Corporate International style, the 1952 commercial office/warehouse building possesses six out of eight character-defining features of the style. With a construction date of 1952, the building falls within the period of significance for the Corporate International style, which is defined by the Modernism Context Statement as the period between 1949 and 1975. This document also provides eligibility standards for structures that are identified to be constructed in this style. These standards mention that in order to be eligible for nomination, Corporate International-style buildings should be constructed within the period of significance and be excellent examples of the style. Additionally, they should retain integrity of location, design, materials, workmanship, and feeling. The 1952 commercial office/warehouse building was constructed within the period of significance and is an excellent example of the style. However, it only retains integrity of location and, therefore, cannot be considered a representative example of the Corporate International style.

According to the Modernism Context Statement, there are eight character-defining features of Streamline Moderne construction. When evaluated under the Streamline Moderne style, the 1952 commercial office/warehouse building possesses five out of eight character-defining features of the style. With a construction date of 1952, the building does not fall within the period of significance for the Streamline Moderne style, which is defined as the period between 1935 and 1945 by the Modernism Context Statement. This document also provides eligibility standards for structures that are identified to be constructed in this style. These standards mention that in order to be eligible for nomination, Streamline Moderne-style buildings should be built within the period of significance and be excellent examples of the style. The 1952 commercial office/warehouse building was not constructed within the period of significance for the Streamline Moderne style and is not an excellent example of the style. Therefore, it cannot be considered a true, representative example of the Streamline Moderne style. In addition, the warehouse portion of the building no longer retains a majority of its original south and west façades and is not a good example of the Utilitarian Industrial style.

The 1952 commercial office/warehouse building does not embody the distinctive characteristics of a style, type, or method of Streamline Moderne-, Corporate International-, or Utilitarian Industrial-style construction and is not a valuable example of the use of indigenous materials or craftsmanship. In addition, as the builder is unknown,

the building cannot be identified as representing the work of an important creative individual. Therefore, the building is not eligible for designation under CRHR Criterion 3.

1951 Commercial Sales and Service and 1952 and 1952 to 1956 Industrial Auxiliary Buildings: These three historic buildings were designed in the Utilitarian Industrial style. While the buildings can best be defined as having been constructed in the Utilitarian Industrial style, they do not embody distinctive characteristics of a style, type, or method of construction and are not a valuable example of the use of indigenous materials or craftsmanship. In addition, as the builders are unknown, the buildings cannot be identified as representing the work of any important creative individuals. Therefore, none of these buildings are eligible for designation under CRHR Criterion 3.

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

The research conducted for this study revealed that because the 7400 East Slauson Avenue property is not associated with any significant persons or events and none of the buildings were constructed using unique or innovative methods of construction, they likely cannot yield any additional information about the history of the city of Commerce or the state of California. Therefore, the buildings are not eligible for designation under CRHR Criterion 4.

The archival research conducted for the 7400 East Slauson Avenue property did not reveal an association with any prehistoric ethnographic villages or placenames. As such, the 7400 East Slauson Avenue property has not yielded, and is unlikely to yield, any information important in prehistory. Therefore, the property as a whole is not eligible for designation under CRHR Criterion 4.

The Project site buildings have been evaluated as not historically or architecturally significant under any CEQA criteria due to a lack of contribution to broad patterns of California's history, association with persons important to our past, distinctive characteristics, and information important to prehistory or history. Because the buildings are not eligible for listing on the CRHR, demolition of the buildings would not result in a significant impact to historical resources.

B. Local Register of Historical Resources

The City of Commerce General Plan indicates that there are several known points of local and statewide historical interest, three of which are officially commemorated: (1) the Uniroyal Tire Plant, (2) the Pillsbury Mill, and (3) the Vail Landing Field. The Uniroyal Tire Plant and the Pillsbury mill are listed on the State Register of Historical Places. The General Plan further lists the following sites as "sites of interest:" The Union Pacific Train Station; the Mount Olive; the Russian Molokan Christian Spiritual Jumpers Lemente, and Mount Carmel ethnic cemeteries; and the 1942 Sleepy Lagoon Murder

site. Because these sites are not within proximity or immediately adjacent to the Project site, Project activities would not result in any impacts to the General Plan's sites of interest. The General Plan does not designate the Project site as a historical resource, and the on-site buildings are not historically significant under any CEQA criteria. Therefore, development of the Project would not impact any locally designated historical resources.

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

Based on the results of the SCCIC records search, no prehistoric sites have been recorded within one mile of the Project. The records search and literature review suggest that there is a low potential for prehistoric sites to be contained within the boundaries of the property due to the extensive nature of past ground disturbances and the lack of natural resources often associated with prehistoric sites. There is a low to moderate potential for archeological resources to be located within the Project site. However, grading into areas of previously undisturbed soils have the potential to adversely impact previously unrecorded resources. Therefore, impacts to archaeological resources are considered potentially significant, since buried or obscured archaeological resources may be encountered during construction.

4.2.5 Cumulative Impact Analysis

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

As noted above under Threshold a, the Project site would not impact any historical resources. Additionally, there are no historical resources within immediate proximity to the Project site. Therefore, the proposed Project would not result in a cumulatively considerable impact to historic resources.

As discussed, under Threshold b, there are no significant archaeological resources located on the Project site. Impacts to previously undiscovered subsurface archeological resources are typically site specific from ground disturbing activities and generally do not combine to result in cumulative impacts, unless resources are identified immediately adjacent to the Project site. There are no related projects in the vicinity of the Project site that could combine with the Project to result in a cumulatively considerable impact. Therefore, cumulative impacts to archaeological resources would be less than significant.

4.2.6 Significance of Impacts Before Mitigation

Threshold a: No Impact. The Project site does not contain any historical sites or resources. Therefore, the Project would not impact any historical sites or resources and no impact would occur.

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

4.2.7 MITIGATION

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

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

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

MM 4.2-3 Prior to issuance of an occupancy permit, the PI shall submit to the City of Commerce a draft monitoring report (even if negative) prepared in accordance with the agency

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

4.2.8 SIGNIFICANT OF IMPACTS AFTER MITIGATION

Thresholds b: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.2-1 through 4.2-3 would ensure that appropriate measures are incorporated into future construction activities to identify and properly treat inadvertent discovery of significant archaeological resources. With the implementation of the required mitigation, impacts to archaeological items would be reduced to less than significant levels.

4.3 ENERGY

This Subsection is based in part on the information provided in the Project's Energy Analysis Report, dated February 23, 2023, and appended to this EIR as Appendix D. (Urban Crossroads, 2023c)

4.3.1 EXISTING CONDITIONS

A. Electricity Consumption

Electricity is currently provided to the Project by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2021 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers (Urban Crossroads, 2023c, p. 11). The estimated facility energy demands from the existing development are 955,888 kilowatts per year (kWh/year). (Urban Crossroads, 2023c, Table 4-11)

B. Natural Gas Consumption

Natural gas is provided to the Project site by Southern California Gas Company (SoCalGas) which is regulated by the California Public Utilities Commission (CPUC). The CPUC regulates natural gas utility service for approximately 10.8 million customers and oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State of California. In 2012, California customers received 35% of their natural gas supply from basins located in the Southwest, 16% from Canada, 40% from the Rocky Mountains, and 9% from basins located within California (Urban Crossroads, 2023c, pp. 12-15). The estimated facility natural gas demand from the existing development is 214,638 kilo-British Thermal Units per year (kBTU/year). (Urban Crossroads, 2023c, Table 4-11)

C. Transportation Energy / Fuel Consumption

The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California, and those vehicles consume an estimated 17.2 billion gallons of fuel each year[1]. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. (Urban Crossroads, 2023c, pp. 15-16)

California's on-road transportation system includes 396,616 land miles, more than 26.6 million passenger vehicles and light trucks, and almost 9.0 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. California is the second-largest consumer of petroleum products, after Texas, and accounts for 10% of the nation's total consumption. The state is the largest U.S. consumer of motor gasoline and jet fuel, and 85% of

[1] Fuel consumptions estimated utilizing information from EMFAC2021.

the petroleum consumed in California is used in the transportation sector. California accounts for less than 1% of total U.S. natural gas reserves and production. As with crude oil, California's natural gas production has experienced a gradual decline since 1985. In 2019, about 37% of the natural gas delivered to consumers went to the state's industrial sector, and about 28% was delivered to the electric power sector. Natural gas fueled more than two-fifths of the state's utility-scale electricity generation in 2019. The residential sector, where two-thirds of California households use natural gas for home heating, accounted for 22% of natural gas deliveries. The commercial sector received 12% of the deliveries to end users and the transportation sector consumed the remaining 1%. (Urban Crossroads, 2023c, p. 16)

The estimated transportation energy demands from the existing development are summarized on Table 4.3-1, *Total Existing Traffic Annual Fuel Consumption (All Vehicles)*.

Table 4.3-1 Total Existing Traffic Annual Fuel Consumption (All Vehicles)

Vehicle Type	Annual VMT	Average Vehicle Fuel Economy (mpg)	Estimated Annual Fuel Consumption (gallons)
LDA	1,442,290171,751	32.9331.24	43,79437,506
LDT1	169,563137,757	27.7824.32	6,1055,665
LDT2	500,638406,730	26.3924.04	18,97016,917
MDV	337,364274,083	21.4919.71	15,69613,903
MCY	65,91353,549	35.4941.21	1,857299
LHDT1	747,153746,136	13.9315.32	53,63548,717
LHDT2	200,627183	14.3666	13,973656
MHDT	1,320,625318,800	9.417.56	140,381174,456
HHDT	660,459670,114	6.8404	96,617110,953
TOTAL (All vehicles)	***5,444,6334,979,103***		***391,029423,072***

Source: (Urban Crossroads, 2023c, Table 4-9)

4.3.2 Regulatory Framework

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency (EPA) are three federal agencies with substantial influence over energy policies and programs. On the state level, the CPUC and the California Energy Commission (CEC) are two agencies with authority over different aspects of energy. Relevant federal and state energy-related laws and plans are summarized below.

A. Federal Regulations

1. Intermodal Surface Transportation Efficiency Act (ISTEA)

The ISTEA promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. (Urban Crossroads, 2023c, p. 18)

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

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of wise transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, 2023c, p. 18)

B. State Regulations

1. Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code § 25301(a)). The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report (IEPR). (Urban Crossroads, 2023c, p. 18)

The 2021 IEPR was adopted February 2022, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. Additionally, the 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. (Urban Crossroads, 2023c, pp. 18-19)

2. State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access. (Urban Crossroads, 2023c, p. 19)

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

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that will be effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. (Urban Crossroads, 2023c, p. 19)

4. AB 1493 Pavley Regulations and Fuel Efficiency Standards

California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption. (Urban Crossroads, 2023c, p. 19)

5. California's Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33% of total retail sales by 2020. (Urban Crossroads, 2023c, p. 20)

6. Clean Energy and Pollution Reduction Act of 2015 (SB 350)

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved

infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (Urban Crossroads, 2023c, p. 20)

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

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

- Reorganize the Independent System Operator (ISO) to develop more regional electrified transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

4.3.3 METHODOLOGY

Information from the CalEEMod Version 2020.4.0 outputs for the Air Quality Impact Analysis (AQIA) was utilized in the analysis, detailing Project related construction equipment, transportation energy demands, and facility energy demands.

In May 2021, the South Coast Air Quality Management District, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy usage. Accordingly, the latest version of CalEEMod has been used to determine the proposed Project's anticipated transportation and facility energy demands. Output from the annual construction and operational model runs are provided in Appendices 4.1 through 4.3 of Technical Appendix D of this EIR.

On November 15, 2022, the EPA approved the 2021 version of the EMissions FACtor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. This energy study utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of analysis, the 2024 analysis year was utilized to determine the average vehicle fuel economy throughout the duration of the Project.

4.3.4 Basis for Determining Significance

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

a. *Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or*

b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

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

4.3.5 Impact Analysis

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

A. Energy Use During Project Construction

The 2023 National Construction Estimator identifies a typical power cost per 1,000 sf of construction per month of $2.50, which was used to calculate the Project's total construction power cost. The total Project construction electricity usage is the summation of the products of the power cost by the utility provider cost per kilowatt hour (kWh) of electricity. The estimated power cost of on-site electricity usage during the construction of the Project is assumed to be approximately $16,695.86. Additionally, the SCE's general service rate schedule were used to determine the Project's electrical usage. As of January 1, 2023, SCE's general service rate is $0.13 per kilowatt hours (kWh) of electricity for industrial services. It is estimated that the total electricity usage during construction for full Project build-out is calculated to be approximately 132,559 kWh. (Urban Crossroads, 2023c, p. 24)

Construction equipment used by the Project would result in single-event consumption of approximately 47,810 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. (Urban Crossroads, 2023c, p. 34)

CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best available control measures (BACMs) inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023c, p. 34)

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 29,537 gallons of fuel. Additionally, fuel consumption from construction vendor and hauling trips (MHDTs and HHDTs) will total approximately 34,408 gallons. Diesel fuel would be supplied by commercial vendors in the City and region. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2021 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2023c, p. 34)

1. Construction Energy Efficiency and Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turn over the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2023c, pp. 29-30)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2023c, p. 30)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023c, p. 30)

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials

extraction, transportation, processing and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2023c, p. 30)

B. Energy Use During Project Operation

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by passenger car and truck vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

1. Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. The VMT per vehicle class can be determined by evaluating the vehicle fleet mix and the total VMT. As presented above in Table 4.3-1, the Project site's existing condition would result in an annual VMT of 4,979,103 and an estimated annual fuel consumption of 423,072 gallons. It should be noted that the existing development energy demands were subtracted from the Project to determine the new energy demands from the proposed Project. As summarized on Table 4.3-2, *Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)*, the Project will result in a net annual VMT of 567,748 and a net estimated annual fuel consumption of 97,382 gallons of fuel. Accordingly, the Project's operational transportation demands would not have a significant impact and would actually result in a reduction in VMT and fuel consumption compared to existing conditions. (Urban Crossroads, 2023c, p. 31)

Table 4.3-2 Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)

Vehicle Type	Annual VMT	Average Vehicle Fuel Economy (mpg)	Estimated Annual Fuel Consumption (gallons)
LDA	1,637,338	31.24	52,409
LDT1	192,494	24.32	7,916
LDT2	568,342	24.04	23,639
MDV	382,988	19.71	19,428
MCY	74,827	41.21	1,816
LHDT1	211,391	15.32	13,802
LHDT2	56,787	14.66	3,874
MHDT	309,898	7.56	40,994
HHDT	977,291	6.04	161,813
TOTAL (ALL VEHICLES)	***4,411,355***		***325,690***
Existing Energy Demands	*4,979,103*		*423,072*
NET ENERGY DEMANDS	***-567,748***		***-97,382***

Source: (Urban Crossroads, 2023c, Table 4-10)

2. Facility Energy Demands

Project operational activities would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by SoCalGas and electricity would be supplied to the Project by SCE. As previously stated, the analysis herein assumes compliance with the 2022 Title 24 Standards. Annual natural gas and electricity demands of the Project are summarized in Table 4.3-3, *Project Annual Energy Demand Summary*.

Table 4.3-3 Project Annual Energy Demand Summary

Land Use	Natural Gas Demand (kBTU/year)
General Light Industrial (40%)	2,127,650
Warehousing (60%)	152,822
Parking	0
Landscape	0
Other Asphalt Surfaces	0
TOTAL PROJECT NATURAL GAS DEMAND	***2,280,472***
Existing Energy Demands	*214,638*
NET NATURAL GAS DEMANDS	***2,065,834***
Land Use	**Electricity Demand** (kWh/year)
General Light Industrial (40%)	1,286,540
Warehousing (60%)	680,591
Parking	27,216
Landscape	0
Other Asphalt Surfaces	0
TOTAL PROJECT ELECTRICITY DEMAND	***1,994,347***
Existing Energy Demands	*955,888*
NET ELECTRICITY DEMANDS	***1,038,459***

Source: (Urban Crossroads, 2023c, Table 4-12)

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). Project facility operational net energy demands are estimated at: 2,065,834 kBTU/year of natural gas and 1,038,459 kWh/year of electricity. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial uses of similar scale and configuration. (Urban Crossroads, 2023c, p. 36)

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not

engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. (Urban Crossroads, 2023c, p. 37)

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

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

A. Project Consistency with Federal Energy Regulations

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

Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because Southern California Association of Governments is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2023c, p. 385)

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

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled and takes advantage of existing infrastructure systems. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. (Urban Crossroads, 2023c, p. 38)

B. State Policies and Regulations

1. Integrated Energy Policy Report

Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation of the goals presented in the 2021 IEPR. Additionally, the Project will comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2021 IEPR. (Urban Crossroads, 2023c, p. 38)

2. State of California Energy Plan

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system, including I-5, I-710 and I-605. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would

not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, 2023c, p. 39)

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

The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. It should be noted that the analysis herein assumes compliance with the 2022 Title 24 Standards. The CEC anticipates that nonresidential buildings will use approximately 30% less energy compared to the prior code. As such, the CalEEMod defaults for Title 24 – Electricity and Lighting Energy were reduced by 30% in order to reflect consistency with the 2022 Title 24 standard. (Urban Crossroads, 2023c, p. 38). The Project would comply with the Title 24 requirements in effect at the time of building permit application submittal.

4. AB 1493 and California RPS

AB 1493 is not applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493. California's RPS is not applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS. (Urban Crossroads, 2023c, p. 39)

5. SB 350

The proposed Project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption. (Urban Crossroads, 2023c, p. 39)

C. Conclusion

As shown above, the Project would not conflict with any of the state or local plans. As such, a less than significant impact is expected.

4.3.6 CUMULATIVE IMPACT ANALYSIS

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

Buildout of the Project, related projects, and additional forecasted growth in SCE's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. SCE forecasts that its total retail sales in the 2020 fiscal year will be 82,223 GWh of electricity. Based on the Project's estimated electrical consumption of 1,038,459 kWh/year, the Project would account for less than 0.001 percent of SCE's total projected retail sales during 2020. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, reduced by measures making the Project more energy-efficient, and consistent with growth expectations for SCE's service area. Furthermore, as with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features and comply with applicable regulations including CALGreen and state energy standards under Title 24. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2020 California Gas Report, utility-driven, statewide natural gas demand is projected to decline at an average rate of 1.0 percent each year through 2035. The decline comes from reduced gas demand in the major market segment areas of residential, electric generation (EG), commercial, and industrial. The industrial gas demand segment is expected to decline at an average rate of 0.2 percent per year. The report estimates natural gas consumption within SoCalGas' planning area will be approximately 2,349 million cubic feet per day in 2024. (California Gas and Electric Utilities, 2020) The Project would account for a small percentage (less than 0.10 percent) of SoCalGas' anticipated annual consumption. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. Furthermore, future development projects would be expected to incorporate energy conservation features and comply with applicable regulations including CALGreen and state energy standards under Title 24. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a net total of 82,429 gallons of gasoline and 47,810 gallons of diesel fuel during construction. The Project's operation would result in an estimated fuel consumption of 97,382gallons of fuel per year compared to existing conditions. For comparison, the CEC Transportation Energy Demand Forecast estimates that between 12.3 billion to 12.7 billion gallons of gasoline and 3.7 billion to 4.7 billion gallons of diesel will be consumed in the year 2030. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Therefore, the Project's

contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.

4.3.7 Significance of Impacts Before Mitigation

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

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

4.3.8 Mitigation

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

4.3.9 Significance of Impacts After Mitigation

Impacts are less than significant.

4.4 GEOLOGY AND SOILS

This Subsection assesses the existing surface and subsurface geologic conditions and features of the Project site, and determines the potential for impacts associated with these features. The analysis in this Subsection is based, in part, on information from the report titled *Geotechnical Investigation* by Southern California Geotechnical, Inc ("SoCalGeo") dated November 25, 2020. (SoCalGeo, 2020) This report is included as Appendix E1 of this EIR. Analysis for Threshold f of this Subsection is based on information from the report titled *Paleontological Assessment for the 7400 East Slauson Avenue Project* by Brian F. Smith and Associates, Inc ("BFSA") dated February 17, 2023. (BFSA, 2023b) This report is included as Appendix E2 to this EIR.

4.4.1 EXISTING CONDITIONS

A. Regional Geology

The Project site is located within the Central Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded by, and cut through by, several active fault systems within the Los Angeles metropolitan area. The Central Basin occupies a large portion of the southeastern part of the Coastal Plain of Los Angeles Basin. The Central Basin is bounded on the northwest by the Santa Monica Mountains, on the northeast by Merced and Puente Hills, and on the southeast by the Orange County Boundary.

B. Site Geological Units

The Project site is currently developed with 249,579 square feet (sf) of existing structures, associated on-site landscaping and parking. The existing structures are assumed to be supported on shallow foundations, with concrete slab-on-grade floors. Subsurface exploration of the Project site was conducted at seven boring locations advancing to depths of 7 to 30 ft below the existing site grades. Artificial fill soils were encountered beneath the existing pavements and main building floor slab. Possible fill soils were encountered beneath the existing pavements, extending to depths of 4.5 to 8 feet below the existing site grades. The possible fill soils generally consist of very loose to very dense silty fine sands with traces of medium sand. Native older alluvial soils were encountered beneath the artificial fill and possible fill soils at all of the boring locations, extending to at least the maximum depth explored of 30 feet below the existing site grades. The near-surface older alluvium generally consists of medium dense to dense clayey fine sands, fine sandy silts and silty fine sands with varying medium sand, and stiff to hard clayey silts and silty clays with varying fine sand content, extending to depths of 8.5 to 17 feet. At greater depths and extending to the maximum depth explored of 30 feet, the older alluvial soils generally consist of medium dense to very dense silty fine sands, fine sandy silts and fine sands with varying medium to coarse sand, clay and silt content (SoCalGeo, 2020, p. 7).

C. Site Topography

Based on elevations obtained from Google Earth, and visual observations made at the time of the subsurface investigation, the overall site topography slopes downwards to the south-southwest at a gradient of less than 1 percent (SoCalGeo, 2020, p. 4).

D. Groundwater

Free water was not encountered during the drilling of any of the borings. Based on the lack of any water within the borings, and the moisture contents of the recovered soil samples, groundwater is considered to have existed at a depth in excess of 30 feet at the time of the subsurface exploration. Historic high groundwater level for the Project site was 23 feet below the ground surface. Additionally, water level readings within monitoring wells within the Project site indicate a high groundwater level of 86 feet below the ground surface in May 2006 (SoCalGeo, 2020, p. 7). Accordingly, groundwater is not anticipated to affect construction at the Project site.

E. Seismic Hazards

1. Faulting

The Project site is located within an area of California known to contain a number of active and potentially active faults. Research of available maps indicates that the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Furthermore, SoCalGeo did not identify any evidence of faulting during the geotechnical investigation. Therefore, the possibility of significant fault rupture on the site is considered to be low (SoCalGeo, 2020, p. 10).

2. Liquefaction, Lateral Spreading, Settlement

Liquefaction is a phenomenon in which loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions, which causes the soil to behave as a viscous liquid. Liquefaction is generally limited to the upper 50 feet of subsurface soils. Research and historical data indicate that loose granular soils of Holocene to late Pleistocene age below a near-surface groundwater table are most susceptible to liquefaction, while the stability of most clayey material is not adversely affected by vibratory motion.

The Project site is not located within a liquefaction potential zone (LACity, 2016). The historic groundwater levels at nearby wells (Well ID: 1562, approximately 0.5 miles west of the Project site) indicates a depth of water deeper than 100 feet below ground surface and would therefore not have the necessary groundwater conditions for a liquefaction risk (LADPW, 2021). Furthermore, the potential for other geologic hazards such as seismically induced settlement, lateral spreading, and subsidence is also low. (SoCalGeo, 2020)

3. Landslide Potential

Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The Project site and surrounding area are generally flat with no significant slopes. Additionally, according to the Commerce 2020 General Plan, the City is not exposed to natural environmental hazards such as landslides. (City of Commerce, 2008)

4. Tsunami and Seiches

The site is not located near any ocean or landlocked bodies of water; therefore, tsunamis or seiches are not considered to be a potential hazard to the Project site.

5. Expansion

Expansive soils are soils that exhibit cyclic shrink and swell patterns in response to variations in moisture content. Laboratory testing performed at the near-surface soils indicates that these materials possess a low expansion potential (EI=20) (SoCalGeo, 2020).

F. Paleontological Resources

A paleontological records search was conducted to determine the Project's potential to directly or indirectly destroy a paleontological resource located underneath the Project site. The Project site is underlain by undivided late to middle Pleistocene old alluvial fan deposits, consisting of moderately to well consolidated, moderately sorted sand, clay, and silt. Pleistocene (more than 12,700 years old) alluvial and alluvial fan deposits in the Los Angeles Basin often yield important Ice Age terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct species of horse, bison, and camel, saber-toothed cats, and others. Therefore, these Pleistocene sediments are accorded a High paleontological resource sensitivity (BFSA, 2023b).

A records search at the Natural History Museum of Los Angeles County was performed for paleontological resources that may be present in the vicinity of the Project. Results of the record search found that while no fossil localities were identified within the Project boundaries, six localities consisting of Pleistocene vertebrate remains were identified within eight miles of the Project site. The closest locality, LACM VP 7702, is located approximately two and a half miles northwest of the Project site, consisting of fossil fish, snake, rodent, and rabbit remains.

Additionally, a review of published and unpublished literature was conducted for potential paleontological resources that are known in the vicinity of the Project site. The sources reviewed did not indicate the presence of any known fossil localities within the Project site. Two nearby localities of late Pleistocene age were identified approximately six miles northwest of the Project site, consisting of a tooth from a mastodon (LACM VP 1157) and a partial jaw from a mammoth with a vertebra from a bison (LACM VP 2029). These localities and those identified within the records search are located in areas mapped as Holocene and late Pleistocene young alluvium, which were recovered from depths ranging from 15 to 43 feet deep below a cover of surficial Holocene sediments (BFSA, 2023b).

4.4.2 Regulatory Framework

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

A. State

1. Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards (California Legislative Information, 1994).

The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Earthquake Fault Zones were called "Special Studies Zones" prior to January 1, 1994. The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than State law requires (California Legislative Information, 1994).

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet) (California Legislative Information, 1994).

2. Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code §§ 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. (CGS, 2019b)

Staff geologists in the Seismic Hazard Zonation Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORIs) those areas prone to liquefaction and earthquake–induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. (CGS, 2019b)

The SHMA requires site-specific geotechnical investigations be conducted within the ZORIs to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy (CGS, 2019b)

3. Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone (California Legislative Information, 2019).

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires (California Legislative Information, 2019).

Before a development permit can be issued, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers (California Legislative Information, 2019).

4. California Building Standards Code (Title 24)

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code § 18909). California Health and Safety Code Section 18902 gives CCR Title 24 the name California Building Standards Code (CBSC). (CBSC, 2019)

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code §§ 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference Health and Safety Code §§ 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (reference Health and Safety Code §§ 17958.7 and 18941.5). (CBSC, 2019)

5. Public Resources Code Section 5097.5

The California Public Resources Code Section 5097.5 states:

- No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site[s], including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the

express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

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

B. Local

1. Commerce 2020 General Plan

The Safety Element of the Commerce 2020 General Plan identifies policies focusing on issues related to geology and soils. The goals and policies that are applicable to the Project are as follows:

Safety Policy 4.1. The City of Commerce will ensure that appropriate mitigation measures relative to soil contamination and soils characteristics (subsidence, erosion, etc.) are required for development and redevelopment in order to reduce hazards.

Safety Policy 4.3. The City of Commerce will work with the Los Angeles County Department of Building and Safety to identify and monitor those buildings that may represent a risk in the event of a major earthquake.

2. Commerce Building Code

The Commerce Building Code is based on the CBSC and is supplemented with local amendments. The Building Code regulates the construction, alteration, repair, moving, demolition, conversion, occupancy, use, and maintenance of all buildings and structures in the City of Commerce. The Building Code is included in the Commerce Municipal Code Chapter 15.07.

4.4.3 METHODOLOGY

To evaluate potential impacts to paleontological resources, BFSA prepared a Paleontological Assessment, Appendix E2. The assessment relies on a paleontological records search performed by Dr. Alyssa Bell of the Natural History Museum of Los Angeles County and assesses soils underlying the Project site to determine its potential to encounter fossils during excavation activities.

4.4.4 BASIS FOR DETERMINING SIGNIFICANCE

Section VI of Appendix G to the CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate the Project's impacts resulting from geologic or soil conditions (AEP, 2021):

a. 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? Refer to Division of Mines and Geology Special Publication 42.
- o *Strong seismic ground shaking?*
- o *Seismic-related ground failure, including liquefaction?*
- o *Landslides?*

b. Result in substantial soil erosion or the loss of topsoil?

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

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

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

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

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

4.4.5 IMPACT ANALYSIS

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

The Project site is located within the Central Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded by, and cut through by, several active fault systems within the Los Angeles metropolitan area. As discussed above, results of the records search found that there are no fossil localities within the Project boundaries and literature review also did not indicate the presence of any known fossil localities within the Project site. However, there are six localities within 8 miles of the Project site. Moreover, the Project site is underlain by undivided late to middle Pleistocene old alluvial fan deposits, consisting of moderately to well consolidated, moderately sorted sand, clay, and silt. Pleistocene (more than 12,700 years old) alluvial and alluvial fan deposits in the Los Angeles Basin often yield important Ice Age terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct species of horse, bison, and camel, saber-toothed cats, and others. Therefore, these Pleistocene sediments are accorded a High paleontological resource sensitivity.

Due to the high paleontological sensitivity assigned to the Pleistocene-aged alluvial fan deposits and the known occurrence of significant terrestrial vertebrate fossils from these deposits in the Los Angeles Basin, grading, excavation, or utility trenching activities at the Project into native soils,

starting at five feet below the surface have the potential to encounter paleontological resources and result in potentially significant impacts.

4.4.6 Cumulative Impact Analysis

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

4.4.7 Significance of Impacts Before Mitigation

Threshold f: Potentially Significant Impact. Grading activities within Pleistocene-aged alluvial fan deposits have the potential to uncover paleontological resources.

4.4.8 Mitigation

MM 4.4-1 Prior to issuance of a grading permit, the Project applicant shall retain a paleontologist to monitor grading activities 5 feet below the surface. Periodic spot checks should be performed from five feet below the surface to a depth of eight feet, to determine the presence of Pleistocene strata or fossils. Once Pleistocene strata are recognized or fossils are discovered, or excavation depths proceed beyond eight feet deep, full-time monitoring for paleontological resources is required.

Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

If paleontological resources are discovered during grading activities:

- Recovered specimens shall be prepared to a point of identification and permanent preservation, including screen-washing sediments to recover small invertebrates and vertebrates if indicated by the results of test sampling. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.

- All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials.

- All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the Project applicant.

- Prior to the issuance of an occupancy permit, the Project applicant shall submit a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the City of Commerce, will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.

4.4.9 Significance of Impacts After Mitigation

Threshold f: Less Than Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures MM 4.4-1 would ensure the proper identification and subsequent treatment of any significant paleontological resources that may be encountered during ground-disturbing activities associated with implementation of the proposed Project. With implementation of the required mitigation, the Project's potential impacts to important paleontological resources would be reduced to less than significant. The Project's contribution to cumulative impacts would likewise be reduced to less than significant.

4.5 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based in part on a report prepared by Urban Crossroads, Inc. titled *7400 Slauson Avenue Greenhouse Gas Analysis*, dated February 23, 2023 and included as Appendix F to this EIR (Urban Crossroads, 2023d). The technical report and analysis in this Subsection assess the proposed Project's potential to generate greenhouse gas (GHG) emissions that could contribute to global climate change and its associated environmental effects.

4.5.1 Existing Conditions

A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2023d, p. 8)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2023d, p. 8)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature. (Urban Crossroads, 2023d, p. 8)

B. Greenhouse Gasses

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (Urban Crossroads, 2023d, pp. 8-9)

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

- Water Vapor (H_2O) is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation, thereby allowing less energy to reach the Earth's surface and heat it up. There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent. (Urban Crossroads, 2023d, pp. 9-10)

- Carbon Dioxide (CO_2) is an odorless and colorless GHG that is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Manmade sources include: the burning of coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases CO_2 emissions has increased dramatically. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Exposure to CO_2 in high concentrations can cause human health effects, but outdoor levels are not high enough to adversely affect human health. (Urban Crossroads, 2023d, p. 10)

- Methane (CH_4) is an extremely effective absorber of radiation, though its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs. Methane has both natural and manmade sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other manmade sources include fossil-fuel combustion and biomass burning. No human health effects are known to occur from atmospheric exposure to methane;

however, methane is an asphyxiant that may displace oxygen in enclosed spaces. (Urban Crossroads, 2023d, p. 11)

- Nitrous Oxide (N_2O) concentrations began to rise in the atmosphere at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N_2O is used as an aerosol spray propellant, (e.g., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction. N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause brain damage. (Urban Crossroads, 2023d, pp. 11-12)

- Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were first synthesized in 1928 and have no natural source. CFCs were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, due to their long atmospheric lifetime, some of the CFCs will remain in the atmosphere for over 100 years. (Urban Crossroads, 2023d, p. 12)

- Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order largest to smallest), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23 emissions. HFC-134a emissions are increasing due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt. No human health effects are known to result from exposure to HFCs, which are manmade and used for applications such as automobile air conditioners and refrigerants. (Urban Crossroads, 2023d, p. 13)

- Perfluorocarbons (PFCs) are primarily produced for aluminum production and semiconductor manufacture. PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The United States Environmental Protection Agency (EPA)

estimates that concentrations of CF_4 in the atmosphere are over 70 ppt. No human health effects are known to result from exposure to PFCs. (Urban Crossroads, 2023d, p. 13)

- Sulfur Hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (22,800). The EPA indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. (Urban Crossroads, 2023d, p. 13)

- Nitrogen Trifluoride (NF_3) is a colorless gas with a distinctly moldy odor. The World Resources Institute indicates that NF_3 has a 100-year GWP of 17,200. NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis. (Urban Crossroads, 2023d, p. 14)

GHGs have varying Global Warming Potential (GWP) values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP of 1. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.5-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in the table below, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 23,900 for Sulfur Hexafluoride (SF_6) and GWP for the IPCC's 6th Assessment Report range from 1 for CO_2 to 1,526 for HFC-134a.

Table 4.5-1 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		Second Assessment Report	6th Assessment Report
CO_2	See*	1	1
CH_4	12.4	21	28
N_2O	121	310	273
HFC-23**	222	11,700	-
HFC-134a	13.4	1,300	1,526
HFC-152a	1.5	140	-
SF_6	3,200	23,900	-

*As per Appendix 8.A of IPCC's 5th Assessment Report, no single lifetime can be given
** Hydrofluorocarbons (HFCs)
Source: (Urban Crossroads, 2023d, Table 2-2)

C. Greenhouse Gas Emissions Inventories

❑ Global

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2018. Based on the latest available data, the sum of these emissions totaled approximately 28,026,643 gigagram (Gg) CO_2e (carbon dioxide equivalent), as shown in Table 4.5-2, *Top GHG-Producing Countries and the European Union.*

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

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	5,981,354
European Union (28-member countries)	3,706,110
India	2,839,420
Russian Federation	2,051,437
Japan	1,148,122
Total	**28,026,643**

Source: (Urban Crossroads, 2023d, Table 2-3)

❑ United States

As noted in Table 4.5-2, the United States, as a single country, was the number two producer of GHG emissions in 2020.

❑ State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2022 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2020 GHG emissions period, California emitted an average 369.2 million metric tons of CO2e per year ($MMTCO_2e$/yr) or 369,200 Gg CO_2e (6.17% of the total United States GHG emissions) (Urban Crossroads, 2023d, p. 16).

❑ Project Site

Under existing conditions, the Project site is developed with a 249,579-sf warehouse building. As part of the traffic analysis, existing counts were taken to determine activity at the trailer parking lot. As summarized in the Project's Focused Traffic Assessment (Appendix I1), the existing warehouse generates 928 two-way trips per day. As such, existing emissions were calculated utilizing CalEEMod Version 2020.4.0. The emissions calculated are based on the existing trips as well as model defaults for area and energy source. For a complete assessment of the existing emissions generated at the Project site, see Subsection 4.1.1 of this EIR. Table 4.5-3, *Existing Project Site GHG*

Emissions, shows the estimated GHG emissions from the existing development. Detailed operation model outputs are present in Appendix 3.3 of Appendix F of this EIR.

Table 4.5-3 Existing Project Site GHG Emissions

Emissions Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Area Source	0.01	3.00E-05	0.00	0.01
Energy Source	180.98	0.01	1.94E-03	181.92
Mobile Source	3,491.75	0.10	0.37	3,604.08
Waste	47.62	2.81	0.00	117.99
Water Usage	151.59	1.89	0.05	212.52
Total CO_2e (All Sources)	**4,116.53**			

Source: (Urban Crossroads, 2023d, Table 3-6)

D. Effects of Climate Change in California

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

- **Public Health**

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (Urban Crossroads, 2023d, p. 16)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90 degrees F in Los Angeles and 95 degrees F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (Urban Crossroads, 2023d, pp. 16-17)

- **Water Resources**

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

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

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply. (Urban Crossroads, 2023d, p. 17)

❑ Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

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

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (Urban Crossroads, 2023d, pp. 17-18)

❑ Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%,

which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC. (Urban Crossroads, 2023d, p. 18)

❑ **Rising Sea Levels**

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches. (Urban Crossroads, 2023d, p. 18)

4.5.2 Regulatory Framework

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

A. International and Federal Regulations

❑ ***International Regulation and the Kyoto Protocol***

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

The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Notably, while the United States is a signatory to the Kyoto Protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto. (Urban Crossroads, 2023d, pp. 18-19)

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

On December 12, 2015, 195 nations – including the United States and China – agreed upon a strategy for combatting GCC. The meeting, known as the 21st Annual Conference of Parties (COP21), established a framework for reducing GHG emissions, to go in effect in 2020. In mitigating global climate change, COP 21 participating nations agreed upon a universal, long-term goal of keeping the global temperature to less than 3.6°F above pre-industrial levels. In addition to that, nations agreed to minimize their GHG emissions as soon as possible, with the recognition that developing countries may take longer to reach this goal than developed countries. Thereafter, nations are to undergo rapid reductions in accordance to best available technological advances. Nations are to submit national climate action plans that detail future objectives to address climate change. (Urban Crossroads, 2023d, p. 18)

Following President Biden's day one executive order, the United States officially rejoined the landmark Paris Agreement on February 19, 2021, positioning the country to once again be part of the global climate solution. Meanwhile, city, state, business, and civic leaders across the country and around the world have been ramping up efforts to drive the clean energy advances needed to meet the goals of the agreement and put the brakes on dangerous climate change..

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

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

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations.

- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section "Clean Vehicles" in Appendix F of this EIR. (Urban Crossroads, 2023d, pp. 20-21)

❑ ***Mandatory Reporting of GHGs***

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the EPA. (Urban Crossroads, 2023d, p. 22)

B. State Regulations

❑ ***California Assembly Bill No. 32 (AB 32)***

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32 include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. The CARB is the state agency charged with monitoring and regulating sources of GHGs. AB 32 states the following: (Urban Crossroads, 2023d, p. 26)

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

❑ ***California Senate Bill No. 32 (SB 32)***

On September 8, 2016, then Governor Jerry Brown signed the SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature. (Urban Crossroads, 2023d, p. 28)

❑ ***California Air Resources Board (CARB) Scoping Plan Update***

In November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The *Final 2017 Scoping Plan Update* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs

that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes.

The *Final 2017 Scoping Plan Update* establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. (Urban Crossroads, 2023d, p. 28)

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5. (Urban Crossroads, 2023d, p. 31)

❑ *Cap-and-Trade Program*

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

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16% between 2013 and 2020, and by an additional 40% by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production)

commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 $MTCO_2e$/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 $MTCO_2e$/yr "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender "compliance instruments" for each $MTCO_2e$ of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year's compliance obligation by November of each year.

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

The Cap-and-Trade Program covered approximately 85% of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. (Urban Crossroads, 2023d, pp. 30-31)

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

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

by the project on global warming or the regional transportation network, if the project: (Urban Crossroads, 2023d, pp. 26-27)

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

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

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

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid EVs (EV) and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California. On March 9, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards for cars and light trucks, which other states can also adopt and enforce. With this authority restored, EPA will continue partnering with states to advance the next generation of clean vehicle technologies. (Urban Crossroads, 2023d, p. 27)

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

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (Urban Crossroads, 2023d, p. 27)

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

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

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

On September 10, 2018, then Governor Brown signed SB 100 and Executive Order B-55-18. Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal. (Urban Crossroads, 2023d, pp. 34-35)

❑ ***Executive Order S-3-05***

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

- By 2010, reduce GHG emissions to 2000 levels.

- By 2020, reduce GHG emissions to 1990 levels.

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

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector. (Urban Crossroads, 2023d, p. 33)

❑ ***Executive Order S-01-07 (LCFS)***

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

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

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (Urban Crossroads, 2023d, p. 34)

❑ ***Executive Order S-13-08***

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy (CNRA 2009) was adopted, which is the "…first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research. (Urban Crossroads, 2023d, p. 34)

❑ ***Executive Order B-30-15***

On April 29, 2015, then Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligns California's GHG reduction targets with those of leading international governments ahead of the late 2015 U.N. Climate Change Conference in Paris. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable for local governments and the private sector.

Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature. (Urban Crossroads, 2023d, p. 34)

❑ ***California Title 20 Standards***

CCR, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. A total of 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment. (Urban Crossroads, 2023d, p. 35)

❑ ***California Title 24 Standards***

CCR Title 24 Part 6: The California Energy Code, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods.

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1,2009, and is administered by the California Building Standards Commission (BSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons.. The 2022 CALGreen standards which are applicable to the Project are located in subsection Title 24 CCR of Appendix F of this EIR. (Urban Crossroads, 2023d, pp. 35-38)

❑ ***Tractor-Trailer GHG Regulation***

The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. (Urban Crossroads, 2023d, pp. 37-38)

❑ **Phase 1 and 2 Heavy-Duty Vehicle GHG Standards**

In September 2011, CARB has adopted a new regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing HD vehicle regulations

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

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

In February 2019, the Office of Administrative Law (OAL) approved the Phase 2 Heavy-Duty Vehicle GHG Standards and became effective April 1, 2019. The Phase 2 GHG standards are needed to offset projected VMT growth and keep heavy-duty truck CO_2 emissions declining. The federal Phase 2 standards establish for the first time, federal emissions requirements for trailers hauled by heavy-duty tractors. The federal Phase 2 standards are more technology-forcing than the federal Phase 1 standards, requiring manufacturers to improve existing technologies or develop new technologies to meet the standards. The federal Phase 2 standards for tractors, vocational vehicles, and heavy-duty pick-up trucks and vans (PUVs) will be phased-in from 2021-2027, additionally for trailers, the standards are phased-in from 2018 (2020 in California) through 2027. (Urban Crossroads, 2023d, p. 38)

❑ Senate Bill No. 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the OPR shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)."

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

Section 15064.3 was added to the CEQA Guidelines and states that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence and should explain the limitations of the particular model or methodology selected for use. (Urban Crossroads, 2023d, pp. 38-39)

❑ South Coast Air Quality Management District

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

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

The South Coast AQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate. South Coast AQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject to South Coast AQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable South Coast AQMD regulations. (Urban Crossroads, 2023d, pp. 39-40)

4.5.3 Methodology

In May 2021, the South Coast AQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.3 of Appendix F of this EIR. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water.

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

Additionally, the South Coast AQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood or documented, and would be challenging to mitigate. Finally, the science to calculate life cycle emissions is not yet established or well defined; therefore, South Coast AQMD has not recommended, and is not requiring, life-cycle emissions analysis. (Urban Crossroads, 2023d, pp. 44-45)

A. Project Construction Emissions

Construction is expected to occur over a 12-month period. The construction schedule utilized in the analysis, shown in Table 4.5-4, *Construction Duration*, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. The duration of construction activity was based on information provided by the Project Applicant, CalEEMod defaults, and the 2024 opening year.

Table 4.5-4 Construction Duration

Phase Name	Days
Demolition/Crushing	20
Site Preparation	10
Grading	30
Building Construction/Concrete Pours	200
Paving	20
Architectural Coating	40

Source: (Urban Crossroads, 2023d, Table 3-1)

❑ Construction Equipment

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

Table 4.5-5 Construction Equipment

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

Source: (Urban Crossroads, 2023d, Table 3-2)

B. Project Operation Emissions

Operational activities associated with the proposed Project will result in emissions of CO_2, CH_4, and N_2O from the following primary sources: Area Source Emissions; Energy Source Emissions; Mobile Source Emissions; On-site Cargo Handling Equipment Emissions; Water Supply, Treatment, and Distribution; and Solid Waste.

❑ Area Source Emissions

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should

be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023d, p. 47)

❑ Energy Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting[1]. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. It should be noted that for the industrial components of the proposed Project, CalEEMod default parameters were used. (Urban Crossroads, 2023d, pp. 47-48)

❑ Mobile Source Emissions

The weekday and weekend trip generation rates used for this analysis are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (11th Edition, 2021) for the proposed general light industrial (ITE Land Use Code 110) and warehousing uses (ITE Land Use Code 150).

To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed industrial land uses. For the proposed industrial uses, it is important to note that although the *7400 Slauson Avenue Trip Generation Assessment* does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1[2] & LDT2[3]), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types.

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the South Coast AQMD recommended truck trip length of 40 miles[4] and an assumption of 100% primary trips for the proposed industrial land uses. In order to be consistent with the *7400 Slauson Avenue Trip Generation Assessment*, trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided in the *7400 Slauson Avenue Trip Generation Assessment*. Heavy trucks are broken down by truck type (or axle type) and are

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

[2] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

[3] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

[4] The average trip length for heavy trucks were based on the South Coast AQMD documents for the implementation of the Facility-Based Mobile Source Measures (FBMSMs) adopted in the 2016 AQMP. South Coast AQMD's "Preliminary Warehouse Emission Calculations" cites 39.9-mile trip length for heavy-heavy trucks. As a conservative measure, a trip length of 40 miles has been utilized for all trucks for the purpose of this analysis.

categorized as either Light-Heavy-Duty Trucks (LHDT1[5] & LHDT2 [6])/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. (Urban Crossroads, 2023d, p. 48)

- *On-site Cargo Handling Equipment Emissions*

It is common for industrial warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. For purposes of analysis, it is assumed that the Project would require on-site operational equipment of up to one (1) 200 horsepower (hp), compressed natural gas or gasoline-powered tractor/loader/backhoe operating at 4 hours a day for 365 days of the year. (Urban Crossroads, 2023d, p. 49)

- *Water Supply, Treatment, and Distribution*

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. CalEEMod default parameters were used to estimate GHG emissions associated with water supply, treatment and distribution for the Project scenario. (Urban Crossroads, 2023d, p. 49)

- *Solid Waste*

Industrial land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, p. 49)

4.5.4 Basis for Determining Significance

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

AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project has

[5] Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.
[6] Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.

no potential to result in a direct impact to GCC; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively considerable way.

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

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

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

The City of Commerce does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. Additionally, a numerical threshold for determining the significance of GHG emissions in the South Coast Air Basin has not been established by the SCAQMD for Projects where it is not the lead agency. As an interim threshold based on guidance provided in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change Handbook, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90% of emissions from future development. The latest threshold developed by SCAQMD using this method is 3,000 MTCO2e/yr for all projects.

4.5.5 Impact Analysis

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

A. Project Construction GHG Emissions

Project construction activities would generate CO_2 and CH_4 emissions. Construction related emissions are expected from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. Construction is expected to occur over a 12-month period. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes due to emission regulations becoming more stringent.

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

emissions. The amortized construction emissions are presented in Table 4.5-6, *Amortized Annual Construction Emissions*.

Table 4.5-6 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
2024	963.03	0.13	0.05	981.35
Total GHG Emissions	963.03	0.13	0.05	981.35
Amortized Construction Emissions ($MTCO_2e$)	**32.10**	**4.48E-03**	**1.67E-03**	**32.71**

Source: (Urban Crossroads, 2023d, Table 3-3)

B. Project Operation GHG Emissions

The annual GHG emissions associated with the operation of the proposed Project are estimated as summarized in Table 4.5-7, *Project GHG Emissions*. It should be noted that the existing development emissions were subtracted from the Project operational emissions to determine the new emissions from the Project. As shown, construction and operation of the Project would generate a net decrease of approximately 346.38 $MTCO_2e$/yr; therefore, the proposed Project would not exceed the South Coast AQMD/City's screening threshold of 3,000 MT CO_2e per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change and impacts would be less than significant.

Table 4.5-7 Project GHG Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	32.10	4.48E-03	1.67E-03	32.71
Area Source	0.03	7.00E-05	0.00	0.03
Energy Source	475.38	0.03	5.85E-03	477.93
Mobile Source	2,707.50	0.13	0.29	2,797.91
On-Site Equipment	50.77	0.02	0.00	51.18
Waste	63.73	3.77	0.00	157.89
Water Usage	180.19	2.25	0.05	252.50
Total CO_2e (All Sources)	**3,770.15**			
Existing Emissions	*4,116.53*			
Net Emissions	**-346.38**			

Source: (Urban Crossroads, 2023d, Table 3-7)

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

As previously stated, pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with 2022 Scoping Plan, is discussed below. It

should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan.

A. 2022 Scoping Plan Consistency

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Additionally, the Project includes design features related to water and solid conservation that will further reduce Project GHG emissions. As such, the Project would not be inconsistent with the 2022 Scoping Plan. As such, the Project would not be inconsistent with the 2022 Scoping Plan. (Urban Crossroads, 2023d, p. 52)

4.5.6 Cumulative Impact Analysis

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

Accordingly, the Project-specific impact analysis provided above reflects a cumulative impact analysis of the Project's GHG emissions, and concludes that the Project would not conflict with applicable GHG-reduction plans, policies, or regulations or generate cumulatively considerable GHG emissions that may have a significant impact on the environment

4.5.7 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. The Project will result in a net decrease of approximately 346.38 $MTCO_2e$ per year; the proposed Project would not exceed the South Coast AQMD/City's screening threshold of 3,000 MT CO_2e per year. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

Threshold b: Less-than-Significant Impact. The Project would not conflict with the 2022 Scoping Plan Update, nor any other applicable plan, policy, or regulation of an agency adopted for the purposes of

reducing the emissions of GHGs. Accordingly, the Project would have a less than significant impact and no mitigation or further analysis is required.

4.5.8 Mitigation

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

4.5.9 Significance of Impacts after Mitigation

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

4.6 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this Subsection is based in part on a technical study that was prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. The report titled "*Phase I Environmental Site Assessment*" (referenced herein, "Apex, 2020") prepared by Apex Companies, LLC (dated November 24, 2020) and appended to this EIR as Appendix G1. The Project-specific Environmental Site Assessment (ESA) was performed in accordance with methods and procedures consistent with the American Society of Testing and Materials (ASTM) Standard Practice E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*.

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

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

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

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

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

4.6.1 Existing Conditions

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

As part of the Phase I ESA (EIR Appendix G1), Apex assessed the conditions on the 13.94-acre Project site and surrounding properties to determine the uses of the Project and surrounding area in order to identify the likelihood of past uses having led to recognized environmental condition (RECs), historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), significant data gaps, or significant business risks in connection with the Project site. A REC is the presence or likely presence of any hazardous substances or petroleum products on the Project

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

❑ *Historical Review*

Based on a review of aerial photographs, topographic maps, fire insurance maps, building permit records, and field reconnaissance, the Project site was vacant between 1896 and 1928. By 1928, based on aerial photography, the Project site is developed with agricultural land. Agricultural land was present on the site until 1951 and 1952, when the two warehouse structures that are presently located on the Project were first constructed. Similarly, six smaller buildings, of which two still exist at the Project site, were constructed. In 1957, Baker Oil Tools, Inc. and Laker Oil Tools, Inc. were listed as the occupants of the Project site. The current Project site occupant, Gehr Industries, has been present at the site since at least 1994. Various other tenants, including trucking companies, transportation services, wire and cable companies, and security companies have since occupied different spaces within the Project site.

❑ *Regulatory Database Review*

A review of the available environmental and historical records for the Project site according ASTM E1527-13 standards was conducted to determine if the Project is a listed regulatory site. The historical operations conducted by Baker Oil Tools, which includes the use of clarifiers, sumps, Underground Storage Tanks (USTs), degreasers, paint spray booths, and machine shops, impacted the groundwater, soils, and soil vapor underlying the Project site. There is an open Spills, Leaks, Investigation, and Cleanup (SLIC) Case (SLIC Case No. 1132 and Los Angeles Regional Water Quality Control Board (LACRWQCB) Subject Property ID No. 2040168) for the known presence of volatile organic compounds (VOCs) the Project site's subsurface media.

Various site assessments conducted from 2002 to the present day identified these VOCs in soil, soil vapor, and groundwater at the Project site. In 2012, an NFA letter was issued for soils at the Project site, along with a Land Use Covenant (LUC) restricting use of the Project site to industrial or commercial purposes. A revised LUC was executed on August 8, 2020, which allows the Project site to be developed for residential use with mitigation and engineering controls in place or commercial use with no vapor mitigation or engineering controls in place. The LUC requires that:

- A Soil Management Plan (SMP) and Health and Safety Plan be generated for all redevelopment activities;
- Residential buildings be designed to include parking structures that are substantially open to the atmosphere (no subterranean parking is prohibited); and
- A protective vapor intrusion mitigation system under any residential building. No barrier is required for commercial structures.

Routine groundwater monitoring at the Project site is on-going with new wells installed as recently as 2019. VOC concentrations in groundwater continue to be detected above regulatory limits.

Upon review of these environmental records on the Project site, Apex identifies the following:

- CREC: Known concentrations of VOCs in soils and soil vapor at the Project site are considered to be a CREC. Regulatory authorities determined that the human health risks posed by the affected soils and soil vapor at the Project site are low enough that these impacted media can to remain in place subject to the implementation of required management plans and engineering controls. Specifically, LARWQCB issued an No Further Action (NFA) letter in relation to the soils at the Project site and the Office of Environmental Health Hazard Assessment (OEHHA) issued a LUC on the Project site, allowing for commercial/industrial use of the Project site without undertaking remedial action. The LUC also allows for residential use of the Project site but requires that engineering controls be implemented to mitigate potential vapor intrusion concerns. The LUC specifies that a commercial/industrial building does not require vapor intrusion mitigation systems.

- REC: Groundwater impacted by VOCs at the Project site is considered to be a REC.

- Business Environmental Risk (BER): Apex considers the long-term groundwater monitoring program that is completed on behalf of the responsible party, Baker Hughes (formerly Baker Oil Tools), to pose a business environmental risk. Redevelopment activities should ensure that existing monitoring wells remain intact and VOC concentrations continue to be monitored.

❑ *Site Reconnaissance*

A site reconnaissance was conducted at the Project site on November 10, 2020. In accordance with ASTM E1527-13, visual observations were made of the interior common areas, maintenance and repair areas, a representative sample of occupant spaces, and periphery of the Project site, including all structures to the extent not obstructed by obstacles. Hazardous substances and petroleum products were observed on site. An approximate 250-gallon tote containing waste oil was observed at the exterior of the southeastern corner of the main warehouse/storage building with minor oil staining on the asphalt adjacent to the tote. Several large dumpsters of non-regulated solid waste (wire cables, packaging, and cardboard) were located in various areas inside and outside the building. Three 55-gallon drums were located on the exterior of various areas of the property. Five 5-gallon buckets of water-based water repellant product were stored inside a new storage building located at the southern edge of the property. Evidence of a former underground storage tank (UST) was observed along the southern side of the main storage/warehouse building, and evidence of a second former UST was observed in the same vicinity, east of the first former UST area. No evidence of transformers labeled as 'Non-Polychlorinated Biphenyls (PCBs) Containing' located on site, however a 'dry type' transformer was observed on the northwestern portion of the property which would not contain oil. Since some of the

buildings located on the Project site were constructed beginning in the 1950s, it is possible that equipment using PCBs could be present in light fixtures or other equipment previously installed on the Project site.

4.6.2 Regulatory Framework

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

A. Federal Regulations

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

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

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

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

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

- *Resource Conservation and Recovery Act (RCRA)*

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

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

❑ *Hazardous Materials Transportation Act (HMTA)*

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

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

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

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

❑ *Hazardous Materials Transportation Uniform Safety Act of 1990*

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

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

❑ *Occupational Safety and Health Act (OSHA)*

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

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

❑ *Toxic Substances Control Act*

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

Various sections of TSCA provide authority to:

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

B. State Regulations

❑ *Cal/OSHA and the California State Plan*

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

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses.

❑ *California Hazardous Waste Control Law*

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

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

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been

duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringent than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as "Title 22."

C. Local Regulations

❑ *Los Angeles County Fire Department*

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

❑ *City of Commerce*

The Safety Element of the City of Commerce General Plan (Chapter 7) identifies policies focusing on issues related to hazards, such as emergency preparedness. Objectives of the Safety Element, include but are not limited to 1) ensuring that the City is prepared to respond to emergencies produced by a variety of hazards; 2) reducing the threat of fire upon human life and structures; and 3) ensuring that hazardous wastes are properly collected, transported, and disposed of.

Additionally, Chapter 16 of the City of Commerce Municipal Code adopts by reference Title 32 of the Los Angeles County Fire Code (City of Commerce, 2019, Chapter 16). Furthermore, the City of Commerce Municipal Code § 19.19.120 regulates use, storage, manufacture, or disposal of hazardous materials according to the standards established by the EPA, the California Department of Health Services, and the South Coast AQMD. (City of Commerce, 2019, § 19.19.120)

4.6.3 Methodology

The Phase I ESA, Appendix G1 of this EIR, was prepared using ASTM Standard Practice E 1527-13. In accordance therewith, the level of environmental assessment was guided by several factors, including the type of property and the risk tolerance of the user. Interviews were conducted with individuals knowledgeable about the Project site and about potential contamination, available pertinent documents (such as historical records and government information systems) were reviewed, and visual observations of the Project site and adjacent properties were conducted to identify high-risk contaminants and high-risk neighbors.

4.6.4 Basis for Determining Significance

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

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

b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment;*

c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*

d. *Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment;*

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

f. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or*

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

As previously presented in the Project's Initial Study (Appendix A), the Project has been assessed under Threshold f) to have less than significant impacts, and the Project would have no impact with regard to Thresholds c), e), and g). The Project is located within an industrial and urbanized area and is not within a quarter mile of any existing or proposed school; the Project site is not located within an airport land use plan or within two miles of a public airport; the Project would not impair or physically interfere with the Los Angeles County adopted Operational Area Emergency Response Plan (OAERP), any of the daily operations of the Los Angeles County Fire Department or City's Urban Search and Rescue team, or local emergency services; and the Project is not located within a high fire severity or wildland fire zone and would not expose people or structures to significant risk of loss, injury, or death involving wildfires. Accordingly, analysis in this EIR Section will not assess the thresholds c), and e) – g).

4.6.5 Impact Analysis

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

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The analysis below addresses the potential for hazardous materials effects associated with Project construction and operation.

A. Project Construction

❑ *General Construction Hazardous Waste*

Heavy equipment (e.g., dozers, excavators, tractors, cranes) would be operated on the Project site during construction of the Project. This heavy equipment may be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than what would occur on any other similar construction site. Construction contractors shall be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA, DTSC, Los Angeles Regional Water Quality Control Board (RWQCB), LACoFD, and the City of Commerce. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. A less than significant impact would occur.

❑ *Impacted Soils*

Construction activities required to develop the Project site would involve the disturbance of on-site soils. There is the potential for the discovery of contamination during these activities due to past reported evidence of soil and groundwater contamination resulting from to the presence of VOCs and historical uses.

The historical operations conducted by Baker Oil Tools, which included the use of clarifiers, sumps, USTs, degreasers, paint spray booths, and machine shops, impacted the groundwater, soils, and soil vapor underlying the Project site. As previously stated, there is an open SLIC Case (SLIC Case No. 1132) and Los Angeles Regional Water Quality Control Board (LARWQCB) Subject Property ID No. 2040168) for the known presence of VOCs in the Project site's subsurface media.

Various site assessments conducted from 2002 to the present day identified VOCs in soil, soil vapor, and groundwater at the Project site. Regulatory authorities determined that the human health risks posed by the affected soils and soil vapor at the Project site are low enough that these impacted media can remain in place subject to the implementation of required management plans and engineering controls. Specifically, LARWQCB issued an NFA letter in relation to the soils at the Project site and the OEHHA issued a LUC on the Project site, allowing for commercial/industrial use of the property without undertaking remedial action. In order to ensure that grading activities do not pose a risk to workers, redevelopment activities are required to comply with the guidelines set forth by LARWQCB and OEHHA in their NFA letter and LUC, and implement an SMP. Details of the SMP are provided below.

- *Soil Management Plan*

In order to ensure public and worker safety, an SMP was prepared (Appendix G2) to provide procedures for efficiently managing potentially impacted soils during utility installation and other future excavation activities. During earthwork activities the grading contractor is required to follow the SMP. Contractors must follow the applicable Cal/OSHA regulations for construction safety in California Code of Regulations (CCR) Title 8, Sections 1500-1938. Contractor employees must be Hazardous Waste Operations and Emergency Response (HAZWOPER) trained personnel.

SMP Section 5, presents the individual/agency responsibilities of the SMP and program participants. The SMP Field Coordinator shall be responsible for: 1) Periodically monitoring field activities to assess potential unknown environmental concerns, if encountered; 2) as directed and after having been permitted (if required), supervise activities related to unknown environmental concerns and other environmental conditions; 3) if and when needed, collect samples and arrange for laboratory analyses; and 4) maintain record of soil sample locations and document field conditions. The SMP Program Manager shall be responsible for: 1) monitoring the work of the SMP Field Coordinator; 2) communicating field activities to the Owner's Project Director; 3) notifying Owner's Project Director and RWQCB of unknown environmental concerns encountered during redevelopment activities; 4) communicating with regulatory agencies to investigate unknown environmental concerns and other environmental conditions; 5) consulting with regulatory agencies to characterize and delineate the proper management of unknown environmental concerns and other unknown environmental conditions; and 6) preparing reports of field activities. The General Contractor Project Manager or Project Site Superintendent shall be responsible for: 1) monitoring grading operations for fugitive dust in accordance with SCAQMD guidelines and taking necessary measures to properly manage dust and soil from leaving the site; 2) reporting suspected unknown environmental concerns to the SMP Field Coordinator who will notify the SMP Program Manager and/or the Owner's Project Director. The SMP Program Manager or Owner's Project Director will contact LARWQCB, when applicable; and 3) if an unknown environmental concern is encountered, the SMP Field Coordinator will direct the General Contractor to stop grading activities in the area of the feature and delineate the area with "Caution" tape, delineators, or fencing, prior to characterization and/or remediation.

SMP Section 6, includes several requirements that will be performed prior to, during, and following the on-site grading and excavation activities. Site-Specific Soil Management Protocols are presented in the SMP Section 6.3. Requirements include but are not limited to:

- **Pre-grading or Pre-excavation Activities –** prepare a Health and Safety Plan; soil monitoring in compliance with South Coast AQMD Rule 1166; use South Coast Various Sites Permit (if VOC-contamination soils are encountered); conduct a pre-grading meeting to provide an oversight of the environmental concerns, worker safety requirements, dust control measures, and protocol for addressing unknown environmental concerns; and sampling of imported soils in accordance with the criteria established in the SMP.

- **During Grading and Excavation Activities** – monitor for fugitive dust in accordance with South Coast AQMD Rule 403, monitor for odors in accordance with South Coast AQMD Rule 402, monitor for VOCs in accordance with South Coast AQMD Rule 1166, and covering and removal of any excavated impacted soils. The SMP Field Coordinator will complete full-time monitoring of soils during the grading activities. Due to the number of environmental studies that have been completed at the site, there is a low likelihood that unknown environmental concerns will be encountered. Impacted soils will be mitigated to current human health based regulatory guidelines, such as Federal EPA, Region 9 RSLi or DTSC-SLs for industrial/commercial land use.

- **Final Grading/Excavation Activities** – The Final Grading/Excavation Environmental Oversight Report will be prepared following completion of the grading/excavation activities and will document the monitoring activities and the results of the environmental issues discovered during these activities, if any.

Without implementation of the SMP, impacts would be potentially significant.

❑ *Demolition*

The use of asbestos-containing materials (ACM, a known carcinogen) and lead-based paint (LBP) (a known toxic), both of which are considered hazardous materials, was a common building construction prior to 1978 and may be present in the existing structures. All proposed demolition activities would be required to comply with all applicable federal, State, and local hazardous materials regulation, which includes mandatory provisions for the safe removal, transport, and disposal of PCBs, ACMs and LBP.

Additionally, the Project is required to comply with South Coast AQMD Rule 1403 (Asbestos Emissions) and Title 17 of the California Code of Regulations (CCR), Division 1, Chapter 8: *Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards* applies. South Coast AQMD Rule 1403 establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities. Assuming that ACMs are present in the existing structure located on-site, then Rule 1403 requires notification of the South Coast AQMD prior to commencing any demolition activities. Rule

1403 also sets forth specific procedures for the removal of asbestos and requires that an on-site representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of ACM. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing, and demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with ACMs. Because future development on the Project Site would be required to comply with AQMD Rule 1403 during demolition activities, impacts due to asbestos would be less than significant.

Title 17, CCR, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards, defines and regulates lead-based paint. Any detectable amount of lead is regulated. During the demolition of the existing structures, there is a potential for exposing construction workers to health hazards associated with lead. The Project would be required to comply with Title 17, CCR, Division 1, Chapter 8, which includes requirements such as employer-provided training, air monitoring, protective clothing, respirators, and handwashing facilities. Mandatory compliance with these requirements would ensure that construction workers and the public are not exposed to significant LBP health hazards or upset during demolition and/or during transport of demolition waste to an appropriate disposal facility and would ensure that impacts related to LBP remain less than significant. Compliance with the above regulatory requirements would ensure that removal of ACMs or LBPs would result in a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

B. Project Operation

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

The operation of the Project would be required to comply with all applicable federal, State, and local regulations to ensure the proper transport, use, and disposal of hazardous substances. With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project is not expected to pose a significant hazard to the public or environment through the routine

transport, use, or disposal of hazardous materials, nor would the Project increase the potential for accident operations which could result in the release of hazardous materials into the environment.

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

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

A. Construction

As would occur during any redevelopment project of similar scale to the proposed Project, there is a possibility of accidental release of hazardous substances during construction activities, such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. Further, the construction contractor would be required to use standard construction controls and safety procedures pursuant to the City of Commerce Municipal Code, California Health and Safety Code § 25500, and Cal/OSHA requirements to avoid and minimize the potential for accidental release and to ensure that materials are appropriately contained and remediated as required by local, State, and federal law.

The Project would comply with the requirements of applicable laws and regulations governing upsets and accidents including the requirements of the hazardous materials disclosure program, the California Accidental Release Prevention Program, the hazardous materials release response plans and inventory program, and California Health and Safety Code § 25500. These requirements would ensure that all potentially hazardous materials are handled in an appropriate manner and would minimize the potential for upset and accident conditions. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

As discussed under Threshold a, there is a potential for the discovery of contamination during these activities due to past reported evidence of soil and groundwater contamination resulting from to the presence of VOCs and historical uses. The SMP would ensure public and worker safety due to the potential release of hazardous materials from contaminated soils. Therefore, without the implementation of the SMP, impacts during construction would be potentially significant. .

B. Operation

Regulatory requirements pertaining to upsets and accidents following during the construction phase would also be implemented during the operational phase. Both the federal government and the State of California (Health and Safety Code, Division 20, Chapter 6.95, §§ 25500–25520; 19 CCR, Chapter

2, Subchapter 3, Article 4, §§ 2729–2734) require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials, termed a reporting quantity, to submit a hazardous materials emergency/contingency plan (also known as a hazardous materials business plan) to their local CUPA. The responsible CUPA for the City and most of Los Angeles County is the LACoFD HHMD. Accordingly, in addition to providing emergency response to hazardous materials releases, the LACoFD HHMD also oversees Hazardous Materials Business Plans, the underground and aboveground storage tank programs, the California Accidental Release Prevention Program. LACoFD HHMD is also responsible for conducting compliance inspections of regulated facilities in Commerce. These requirements would ensure that all potentially hazardous materials are handled in an appropriate manner and would minimize the potential for safety impacts. With mandatory regulatory compliance, the Project would not increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Impacts would be less than significant.

Threshold d: ***Would the Project be located on a site which is included on a list of hazardous materials sites which complied 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 was listed in the following databases: Hazard Mapping System (HMS), Hazardous Waste Transporter System (HWTS), Emissions Inventory Data (EMI), Hazardous Waste Information System (HAZNET), California Environmental Reporting System (CERS), Cleanup Program sites-Spills, Leaks, Investigation, and Cleanup (CPS-SLIC), Enforcement & Compliance History Information (ECHO), Resource Conservation and Recovery Act-Small Quantity Generator (RCRA-SQG), Facility Index System (FINDS), Waste Discharge Requirement (WDR), Resource Conservation and Recovery Act (RCRA) non generators (NonGen/NLR), and California Integrated Water Quality System (CIWQS). Most notable amongst these listings at the Project site is the open SLIC Case (SLIC Case No. 1132 and LARWQCB Subject Property ID No. 2040168). This case is related to groundwater, soils, and soil vapor that have been impacted by VOCs in the media underlying the Project site. The party responsible for these impacts is a former tenant of the Project site, Baker Oil Tools, now Baker Hughes, a company that manufactured oil field equipment from the early 1950s until 1982. Former manufacturing operations at the Project site under Baker Oil Tools included the use of clarifiers, sumps, underground storage tanks (USTs), degreasers, paint spray booths, and machine shops. While Baker Oil Tools was in operation, three dry wells were also located at the Project site. One drilling derrick stills exists at the Project site, which is assumed to have been used to test oil field tools. All other listings are reported as closed/remediated.

As discussed under Threshold a (Project Construction), impact soils may be encountered during grading activities. Therefore. impacts would be potentially significant.

4.6.6 Cumulative Impact Analysis

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

The area considered for cumulative impacts is the City and related projects. Hazards and hazardous waste impacts are typically unique to each site and do not usually contribute to cumulative impacts. Cumulative development projects would be required to assess potential hazardous materials impacts on the development site prior to grading. The Project and other cumulative projects would be required to comply with laws and regulations governing hazardous materials used and generated as described. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant after regulatory compliance

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

4.6.7 Significance of Impacts Before Mitigation

Threshold a: Potentially Significant Impact. The Project site contains soils and groundwater contaminated with VOCs.

Threshold b: Potentially Significant Impact. During Project construction and operation, mandatory compliance with federal, State, and local regulations would ensure that the proposed Project would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials. However, there is a potential for release of hazardous materials from potentially contaminated soils during construction activities.

Threshold d: Potentially Significant Impact. The Project Site is located on lists of hazardous materials sites complied pursuant to Government Code § 65962.5.

4.6.8 Mitigation

MM 4.6-1 Prior to the issuance of grading permits, the Project Applicant shall prepare an Addendum to the Soil Management Plan (SMP) to address grading and excavation activities specific to the Project. The SMP Addendum shall be submitted for approval by the Los Angeles Regional Quality Control Board (LARWQCB). The Project Contractor shall adhere to the protocols and performance standards stipulated in the SMP (Appendix G2 of this EIR). Contractors working at the site shall have the current Hazardous Waste and Emergency Response standard (HAZWOPER) health and safety training and follow all applicable Cal/OSHA regulations for construction safety. A Completion Report shall be prepared at the conclusion of grading activities. The report shall document field monitoring activities and visual observations made during grading/excavations, as well as soil sampling locations and results. The report shall include a description of the location of impacted soil encountered, actions taken to characterize and mitigate impacts, confirmation soil sampling results, and disposition of any excavated soil. In addition, the report shall include a description of encountered subsurface structures and steps to remove and close such structures. The report shall be reviewed and approved by the City of Commerce Director of Economic Development and Planning, prior to issuance of building permits.

4.6.9 Significance of Impacts after Mitigation

Thresholds a, b, and d: Less than Significant Impact with Mitigation. Project construction activities would require preparation of an addendum to the SMP. Implementation of Mitigation Measure MM 4.7-1 would ensure preparation of an SMP addendum and compliance, which would reduce potential impacts related to exposure resulting from routine transport, use, or disposal of contaminated or potentially contaminated soils to less than significant.

4.7 NOISE

The analysis in this section is based on a site-specific noise impact analysis titled *7400 Slauson Avenue Noise and Vibration Analysis*, dated January 26, 2023. The report (herein, "Noise Impact Analysis") was prepared by Urban Crossroads, Inc. (Urban Crossroads) and is included as Appendix H to this EIR. All references used in this section are included in EIR Section 7.0, *References*.

4.7.1 NOISE FUNDAMENTALS

A. Noise Definitions

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. (Urban Crossroads, 2023e, p. 7)

B. Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous noise levels. The most commonly used figure is the equivalent continuous noise level (L_{eq}). L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given time period. L_{eq} values are not measured directly but are calculated from sound pressure levels typically measured in dBA. (Urban Crossroads, 2023e, p. 8)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour levels may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of five (5) dB to sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 dB to sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and nighttime hours when sound appears louder. CNEL does not represent the actual sound level heard at any particular time, but rather represents the total sound exposure. The City of Commerce relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources. (Urban Crossroads, 2023e, p. 8)

C. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on geometric spreading, ground absorption, atmospheric effects, and shielding. (Urban Crossroads, 2023e, p. 8)

1. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2023e, p. 8)

2. Ground Absorption Noise

To account for the ground-effect attenuation (absorption) of noise, two types of site conditions are commonly used in noise models: soft site and hard site conditions. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. (Urban Crossroads, 2023e, pp. 8-9)

3. Atmospheric Effects

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors that may affect noise levels include air temperature, humidity, and turbulence. (Urban Crossroads, 2023e, p. 9)

4. Shielding

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an “out of sight, out of mind” effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal

Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure. (Urban Crossroads, 2023e, p. 9)

D. Response to Noise

Approximately 10% of the population has a very low tolerance for noise and will object to any noise not of their own making. Consequently, even in the quietest environment, some complaints will occur. Another 25% of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given environment. Despite this variability in behavior on an individual level, the population as a whole can be expected to exhibit the following responses to changes in noise levels: an increase of 1 dBA cannot be perceived except in carefully controlled laboratory experiments; a change of 3 dBA is considered "barely perceptible;" and a change of 5 dBA is considered "readily perceptible." (Urban Crossroads, 2023e, p. 10)

E. Vibration

Vibration is the periodic oscillation of a medium or object. Sources of groundborne vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and decibels (dB) and is denoted as VdB. (Urban Crossroads, 2023e, p. 11)

The background vibration-velocity level in residential areas is generally 50 VdB. Groundborne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. (Urban Crossroads, 2023e, p. 11)

4.7.2 Existing Noise Conditions

A. Existing Ambient Noise Environment

To assess the existing noise level environment, 24-hour noise level measurements were taken at five locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Figure 4.7-1, *Noise Measurement Locations*, provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Tuesday, June 15th, 2021. Table 4.7-1, *Existing Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 7:00 p.m.), evening (7:00 p.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. (Urban Crossroads, 2023e, p. 20)

Table 4.7-1 Existing Noise Level Measurements

Location	Description	Average Noise Level (dBA L_{eq})		
		Daytime	Evening	Nighttime
L1	North of the Project site on East Slauson Avenue near Mount Olive Memorial Park Jewish Cemetery located at 7231 Slauson Avenue	72.2	69.4	69.5
L2	Northeast of the Project site on Greenwood Avenue near a single-family residence located at 7508 Wellman Street	67.1	62.8	62.8
L3	East of the Project site on Greenwood Avenue near a single-family residence located at 5829 Ramon Court	65.5	63.8	63.5
L4	South of the Project site on Watcher Street near a single-family residence located at 6936 Watcher Street	57.3	56.9	54.4
L5	Southwest of the Project site on Danielson Court near a single-family residence located at 6730 Danielson Court	55.5	55.9	51.6

Source: (Urban Crossroads, 2023e, Table 5-1)

Source(s): Urban Crossroads (09-15-2021)

Figure 4.7-1

Not to Scale

Noise Measurement Locations

4.7.3 REGULATORY FRAMEWORK

The following is a brief description of the Federal, State, and local environmental laws and related regulations governing noise.

A. Federal Regulations

1. Noise Control Act of 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA, 2019)

While primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce, control of which require national uniformity of treatment. The United States Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all Federal agencies relating to noise research and noise control. (EPA, 2019)

2. Federal Transit Administration

The Federal Transit Administration (FTA) published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact. (FTA, 2018, p. 1)

3. Federal Highway Administration

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with Federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, Title 23 of the United States Code of Federal Regulations (CFR) Part 772 Procedures for Abatement of Highway Traffic Noise and Construction Noise, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies

impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design. (FHWA, 2017)

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in 23 CFR Part 772. The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of federal-aid highway funds for construction or reconstruction of a highway. (FHWA, 2017)

4. Construction-Related Hearing Conservation

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2002)

B. State Regulations

1. State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city in the State of California adopt a General Plan that includes a Noise Element, which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. (Urban Crossroads, 2023e, p. 13)

2. State of California Building Standards Code

The State of California's noise insulation standards are codified in the California Code of Regulations (CCR) Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA L_{eq} for any hour of

operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required.

3. OPR General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor's Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating General Plans. The Guidelines provide direction on the required Noise Element portion of the General Plans. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. Local governments must "analyze and quantify" noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that "minimizes the exposure of community residents to excessive noise." Noise level contours must be mapped and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. The Noise Element directly correlates to the Land Use, Circulation, and Housing Elements. The Noise Element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses. (OPR, 2017, pp. 131-132)

C. Local Regulations

1. Commerce 2020 General Plan Safety Element

The Commerce 2020 General Plan Safety Element addresses the control and abatement of environmental noise to protect the citizens from excessive exposure to noise. The Safety Element includes those issues mandated by the State for consideration in noise elements and specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources, such as arterial roads, freeways, airports, and railroads. In addition, the Safety Element identifies several policies to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. The Safety Element contains the following policies related to the Project – Safety Policies 6.1, 6.3 through 6.5, 6.7, and 6.8. (Urban Crossroads, 2023e, pp. 13-14)

To ensure noise-sensitive land uses are protected from high levels of noise, the City of Commerce has developed its own land use compatibility standards, based on recommended parameters from the Governor's OPR. Table 7-1 of the Safety Element identifies standards to evaluate noise and land use compatibility. The City's land use compatibility standards use the CNEL noise descriptor and are intended to be applicable for land use designations exposed to noise levels generated by transportation-related sources. These guidelines indicate the compatibility of noise-sensitive land uses in areas

subject to noise levels of 55 to 80 dB CNEL. To control stationary noise sources from industrial, commercial, and manufacturing facilities that may affect sensitive land uses, Safety Policy 6.3 requires that the City continue to enforce the noise control ordinance. The City's noise control ordinance, together with the General Plan, establishes exterior noise standards for a wide range of land uses in the City. (Urban Crossroads, 2023e, p. 14)

2. Commerce Municipal Code

❑ **Construction-Related Noise Standards**

Commerce Municipal Code Section 19.19.160[K][3] establishes limits on the hours of operation for construction activities. Specifically, no person or organization within 500 feet of a residential zone shall operate equipment or perform any outside construction or repair work on buildings, structures, or projects, or operate any pile driver, steam shovel, pneumatic hammer, derrick, steam, electric hoist, or other construction type device between the hours of 10:00 p.m. and 7:00 a.m., unless a permit has been obtained from the City. (Urban Crossroads, 2023e, p. 15)

❑ **Operational Noise Standards**

Commerce Municipal Code Section 19.19.160 contains the exterior noise level standards for residential, commercial, and industrial land uses as shown in Table 4.7-2, *Operational Noise Standards*. (Urban Crossroads, 2023e, p. 14)

Table 4.7-2 Operational Noise Standards

City	Land Use	Exterior Noise Level Standards (dBA L_{eq})[2]		
		Daytime	Evening	Nighttime
Commerce[1]	Residential	55	50	45
	Commercial	65	65	55
	Industrial	70	70	70

Source: (Urban Crossroads, 2023e, Table 3-1)
[1] City of Commerce Municipal Code, Section 19.19.160 Noise (Appendix 3.1).
[2] L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given period. "Daytime" = 7:00 a.m. to 7:00 p.m.; "Evening" = 7:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

4.7.4 METHODOLOGY

A. Construction Noise Analysis

To describe peak construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) published the Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database, provides a

comprehensive list of the noise generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. Consistent with FTA guidance for general construction noise assessment, Table 4.7-3, *Construction Reference Noise Levels*, presents the combined construction reference noise levels for the loudest construction equipment, assuming they operate at the same time. The construction noise analysis presented below does not include the planned 8-foot-high loading dock screenwall. (Urban Crossroads, 2023e, pp. 35-36)

Table 4.7-3 Construction Reference Noise Levels

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L_{eq})[1]	Combined Noise Level (dBA L_{eq})[2]	Combined Sound Power Level (PWL)[3]
Site Preparation	Crawler Tractors	78	80	112
	Hauling Trucks	72		
	Rubber Tired Dozers	75		
Grading	Graders	81	83	115
	Excavators	77		
	Compactors	76		
Building Construction	Cranes	73	81	113
	Tractors	80		
	Welders	70		
Paving	Pavers	74	83	115
	Paving Equipment	82		
	Rollers	73		
Architectural Coating	Cranes	73	77	109
	Air Compressors	74		
	Generator Sets	70		

[1] FHWA Roadway Construction Noise Model (RCNM).
[2] Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calibrated using the CadnaA noise model at the reference distance to the noise source.
Source: (Urban Crossroads, 2023e, Table 8-1)

The construction noise analysis evaluates Project construction-related noise levels at the closest nearby receiver locations in the Project study area. A total of five receiver locations were considered in the construction noise analysis. The following five receiver locations used in the construction noise analysis are shown on Figure 4.7-2, *Noise Receiver Locations*, and described below. The modeled noise-sensitive receiver locations are representative of existing receptors nearest the Project site. It is

not necessary to study every single receiver location surrounding the Project's construction area because receivers located at a similar distance from Project-related construction activities with similar ground elevations, orientation, and intervening physical conditions as the five modeled receptor locations would experience the same or very similar noise effects as those disclosed herein, and those at a greater distance would experience lesser noise effects.

B. Stationary Noise Analysis

For the operational stationary noise analysis, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. The reference noise level measurements included the types of equipment and site operations that are expected on the Project site. Table 4.7-4, *Operational Reference Noise Levels*, provides a summary of the reference noise level measurements. It is important to note that the following projected noise levels assume the worst case noise environment with the loading dock activity, tractor trailer parking, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements all operating continuously. These sources of noise activity will likely vary throughout the day.

The stationary noise analysis evaluates Project-related noise levels at the nearby receiver locations in the Project study area. The receiver locations used in the stationary noise analysis are the same that are used in the construction analysis (refer to Figure 4.7-2, *Noise Receiver Locations*). As discussed earlier in this Subsection, it is not necessary to study every single receiver location surrounding Project site because receivers located at similar distances from the Project site with similar ground elevations, orientation, and intervening physical conditions (e.g., walls, landscaping) as the modeled receptor locations would experience noise levels the same or very similar to those disclosed herein.

Table 4.7-4 Operational Reference Noise Levels

Noise Source[1]	Noise Source Height (Feet)	Min./Hour[2]			Reference Noise Level (dBA L_{eq}) @ 50 Feet	Sound Power Level (dBA)[3]
		Day	Evening	Night		
Loading Dock Activity	8	60	60	60	62.8	103.4
Tractor Trailer Parking	8	60	60	60	62.8.	103.4
Roof-Top Air Conditioning Units	5	39	39	28	57.2	88.9
Trash Enclosure Activity	5	60	60	30	57.3	89.0
Parking Lot Vehicle Movements	5	60	60	60	56.1	79.0
Truck Movements	8	60	60	60	58.0	93.2

[1]As measured by Urban Crossroads, Inc.
[2]Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. – 10:00 p.m.; "Evening" = 7:00 p.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. – 7:00 a.m.
[3]Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.
Source: (Urban Crossroads, 2023e, Table 7-1)

Source(s): Urban Crossroads (09-15-2021)

Figure 4.7-2

Not to Scale

Noise Receiver Locations

C. Vibration

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.7-5, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using the following vibration assessment methods defined by the Federal Transit Administration (FTA). (Urban Crossroads, 2023e, pp. 38-39)

Table 4.7-5 Vibration Source Levels for Construction Equipment

Equipment	Vibration Decibels (VdB) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibration Roller	0.210

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment
Source: (Urban Crossroads, 2023e, Table 8-4)

4.7.5 Basis for Determining Significance

Appendix G to the CEQA Guidelines addresses typical adverse effects related to noise, and includes the following threshold questions to evaluate the Project's impacts on forest and agricultural resources (OPR, 2019).

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

b. *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*

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

As previously presented in the Project's Initial Study (Appendix A), the Project site is not located within two miles of a public airport or within an airport land use plan. The closest airport is the San

Gabriel Valley Airport located approximately 9.2 miles northeast of the Project site (T&B Planning, 2020, 3-31). Accordingly, the analysis in this section will not assess threshold c).

A. Incremental Noise Level Increases

Noise level increases resulting from the Project are evaluated based on the CEQA Guidelines Appendix G described above at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the so-called ambient environment.

In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (L_{eq}).

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in ambient noise levels. Based on the FICON criteria, the degree to which a given noise level increase is considered acceptable is reduced when the without Project noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or *readily perceptible*, 3 dBA or *barely perceptible*, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans.

B. Summary of Significance Criteria

Noise impacts will be considered significant if any of the following occur as a result of the proposed Project. The significance criteria for noise impacts is summarized in Table 4.7-6, *Summary of Noise Significant Criteria*.

Table 4.7-6 Summary of Noise Significant Criteria

Analysis	Condition(s)	Significance Criteria		
		Daytime	Evening	Nighttime
Construction	Permitted between 7:00 a.m. to 10:00 p.m.[2]			
	Noise Level Threshold[3]	80 dBA L_{eq}		
	Vibration Level Threshold[4]	0.3 PPV (in/sec)		
Operational	Residential Exterior Noise Level Standards[2]	55 dBA L_{eq}	50 dBA L_{eq}	45 dBA L_{eq}
	Commercial - Exterior Noise Level Standards[2]	65 dBA L_{eq}	65 dBA L_{eq}	55 dBA L_{eq}
	Industrial - Exterior Noise Level Standards[2]	70 dBA L_{eq}	70 dBA L_{eq}	70 dBA L_{eq}
	If ambient is < 60 dBA L_{eq}[1]	≥ 5 dBA L_{eq} Project increase		
	If ambient is 60 - 65 dBA L_{eq}[1]	≥ 3 dBA L_{eq} Project increase		
	If ambient is > 65 dBA L_{eq}[1]	≥ 1.5 dBA L_{eq} Project increase		

[1]FICON, 1992.
[2] City of Commerce Municipal Code, Section 19.19.160 Noise (Appendix 3.1).
[3]Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
[44] Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2023e, Table 4-1)

1. Construction Noise

Project construction activities would result in a significant impact if construction noise conflicts with the Commerce Municipal Code Section 19.19.160 as follows:

- If Project-related construction activities take place outside the permitted hours of 7:00 a.m. to 10:00 p.m.

The Commerce Municipal Code does not establish numerical construction noise thresholds for construction activities that occur during the hours permitted by the Commerce Municipal Code Section 19.19.160. Therefore, for the purposes of analyzing the significance of construction noise under CEQA, FTA's noise criteria as specified in the Transit Noise and Vibration Impact Assessment is used as the significance threshold for construction activities.

- If Project-related construction activities create noise levels which exceed the 80 dBA L_{eq} acceptable noise level threshold at the nearby sensitive receiver locations.

2. Operational Noise

Project operational activities would result in a significant impact if operational noise exceeds the levels allowed by the Commerce Municipal Code Section 19.19.160 as follows:

- For the noise sensitive residential land uses, the Municipal Code identifies a noise level standard of 55 dBA L_{eq}, during the daytime hours of 7:00 a.m. to 7:00 p.m., 50 dBA L_{eq}

during the evening hours of 7:00 p.m. to 10:00 p.m. and 45 dBA L_{eq} during the nighttime hours of 10:00 p.m. to 7:00 a.m. For commercial uses the municipal codes identifies a daytime (7:00 a.m. to 10:00 p.m.) noise level limit of 65 dBA L_{eq} and a nighttime noise level limit of 55 dBA L_{eq}. For industrial uses the municipal codes identifies a noise level limit of 70 dBA L_{eq} anytime.

Additionally, if the existing ambient noise levels at the nearby noise-sensitive receivers near the Project site:

- are less than 60 dBA L_{eq} and the Project creates a *readily perceptible* 5 dBA L_{eq} or greater Project-related noise level increase; or
- range from 60 to 65 dBA L_{eq} and the Project creates a *barely perceptible* 3 dBA L_{eq} or greater Project-related noise level increase; or
- already exceed 65 dBA L_{eq} and the Project creates a community noise level increase of greater than 1.5 dBA L_{eq}.

3. Vibration

The Commerce Municipal Code does not define the numeric level at which a development project's vibration levels are considered "excessive." For purposes of this EIR, the metric used to evaluate whether the Project's vibration levels are considered "excessive" during either construction or operation is adapted from FTA's Transit Noise and Vibration Impact Assessment Manual.

- If Project-generated vibration levels exceed the FTA's acceptable vibration thresholds of 0.3 PPV (in/sec).

4.7.6 IMPACT ANALYSIS

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

The analysis presented on the following pages summarizes the Project's potential construction and operational noise levels, including operational noise that would be generated on-site as well as off-site noise that would be generated by Project-related traffic. The detailed noise calculations for the analysis presented here are provided in Appendices 7.1 and 8.1 of Appendix H of this Draft EIR.

A. Construction Noise Impact Analysis

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages, based on the *Air*

Quality Impact Analysis (Appendix B1) for the Project: Demolition, Site Preparation; Grading; Building Construction; Paving; and Architectural Coating. The construction noise analysis was prepared using reference noise level measurements taken by Urban Crossroads, Inc. to describe the typical construction activity noise levels for each stage of Project construction.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed, depicted on Figure 4.7-3, *Construction Noise Source Locations*. To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location.

To evaluate whether the Project will generate potentially significant short-term noise levels at nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations will satisfy the reasonable daytime 80 dBA L_{eq} significance threshold during Project construction activities as shown on Table 4.7-7, *Project Construction Noise Levels.* Therefore, construction noise impacts are considered less than significant at all receiver locations.

Table 4.7-7 Project Construction Noise Levels

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	61.4	80	No
R2	66.2	80	No
R3	74.7	80	No
R4	69.6	80	No
R5	59.5	80	No

[1]Noise receiver locations are shown on Exhibit 8-A of Appendix H.
[2]Highest construction noise level operating at the Project site boundary to nearby receiver locations (Table 4.7-1)
[3]Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
[4]Do the estimated Project construction noise levels exceed the construction noise level threshold?
Source: (Urban Crossroads, 2023e, Table 8-3)

Project-related construction activities are expected to occur on weekdays (and, potentially, on Saturdays) during the hours when the Commerce Municipal Code does not restrict construction noise. The Commerce Municipal Code exempts construction activities from noise restrictions so long as construction activities within 500 feet of a residential zone occur between the hours of 7:00 a.m. and 10:00 p.m. Accordingly, Project construction would not exceed the standards established by the Commerce Municipal Code and impacts would be less than significant.

Source(s): Urban Crossroads (09-15-2021)

Figure 4.7-3

Not to Scale

Construction Noise Source Locations

B. Operational Noise Impact Analysis – Stationary Noise

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds and the adjusted standards to reflect the ambient noise levels based on the City's exterior noise level standards at nearby noise-sensitive receiver locations. Table 4.7-8, *Project Operational Noise – Stationary Noise* shows the operational noise levels associated with the Project will satisfy the City's daytime, evening, and nighttime exterior noise level adjusted standards to reflect the ambient noise conditions. The Project will also benefit from the planned 8-foot high screenwall that is not included as part of the unmitigated Project operational noise analysis. Accordingly, implementation of the Project operation would not result in the exposure of receivers near the Project site to stationary noise levels that exceed the exterior noise level standards established in the Commerce Municipal Code. Impacts would be less than significant.

Table 4.7-8 Project Operational Noise – Stationary Noise

Receiver Location[1]	Measurement	Project Operational Noise Levels (dBA L_{eq})[2]			Noise Level Standards (dBA L_{eq})[3]			Noise Level Standards Exceeded?[4]		
		Day	Eve.	Night	Day	Eve.	Night	Day	Eve.	Night
R1	L1	40.3	40.3	40.3	72	69	70	No	No	No
R2	L2	37.9	37.9	37.5	67	63	63	No	No	No
R3	L3	45.6	45.6	45.5	66	64	64	No	No	No
R4	L4	48.5	48.5	48.4	57	57	54	No	No	No
R5	L5	42.6	42.6	42.6	56	56	52	No	No	No

[1]See Exhibit 6-A of Appendix H for the receiver locations.
[2]Proposed Project operational noise levels as shown on Tables 7-2 to 7-4 of Appendix H.
[3]Exterior noise level standards to reflect the ambient noise levels (see table 5-1 of Appendix H) per the Commerce Municipal Code Section 19.19.160 (E).
[4]Do the estimated Project operational noise source activities exceed the noise level standards?
"Day" = 7:00 a.m. to 7:00 p.m.; "Eve." = 7:00 p.m. to 10:00 p.m.; "Night" = 10:00 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2023e, Table 7-5)

Noise levels that would be experienced at receiver locations when unmitigated Project-source noise is added to the ambient daytime, evening, and nighttime conditions are presented on Table 4.7-9, *Project Operational Noise Level Contributions – Daytime*, Table 4.7-10, *Project Operational Noise Level Contributions – Evening*, and Table 4.7-11, *Project Operational Noise Level Contributions – Nighttime*, respectively. As indicated on Table 4.7-9 through Table 4.7-11, the Project would not contribute significant operational noise level increase during the daytime, evening, or nighttime hours. (Urban Crossroads, 2023e, p. 32) On this basis, Project operational stationary-source noise would not result in a substantial temporary/periodic, or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Noise impacts associated with long-term on-site operations would be less than significant.

Table 4.7-9 Project Operational Noise Level Contributions – Daytime

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	40.3	L1	72.2	72.2	0.0	1.5	No
R2	37.9	L2	67.1	67.1	0.0	1.5	No
R3	45.6	L3	65.5	65.5	0.0	1.5	No
R4	48.5	L4	57.3	57.8	0.5	5.0	No
R5	42.6	L5	55.5	55.7	0.2	5.0	No

[1] See Figure 4.7-2 for the receiver locations.
[2] Total Project daytime operational noise levels as shown on Table 7-2 of Appendix H.
[3] Reference noise level measurement locations as shown on Exhibit 5-A of Appendix H.
[4] Observed daytime ambient noise levels as shown on Table 4.7-1 of Appendix H.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown in Section 4.7.5, above.
Source: (Urban Crossroads, 2023e, Table 7-6)

Table 4.7-10 Project Operational Noise Level Contributions – Evening

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	40.3	L1	69.4	69.4	0.0	1.5	No
R2	37.9	L2	62.8	62.8	0.0	5.0	No
R3	45.6	L3	63.8	63.9	0.1	5.0	No
R4	48.5	L4	56.9	57.5	0.6	5.0	No
R5	42.6	L5	55.9	56.1	0.2	5.0	No

[1] See Figure 4.7-2 for the receiver locations.
[2] Total Project daytime operational noise levels as shown on Table 7-3 of Appendix H.
[3] Reference noise level measurement locations as shown on Exhibit 5-A of Appendix H.
[4] Observed daytime ambient noise levels as shown on Table 4.7-1 of Appendix H.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown in Section 4.7.5, above.
Source: (Urban Crossroads, 2023e, Table 7-7)

Table 4.7-11 Project Operational Noise Level Contributions – Nighttime

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	40.3	L1	69.5	69.5	0.0	1.5	No
R2	37.5	L2	62.8	62.8	0.0	5.0	No
R3	45.5	L3	63.5	63.6	0.1	5.0	No
R4	48.4	L4	54.4	55.4	1.0	5.0	No
R5	42.6	L5	51.6	52.1	0.5	5.0	No

[1] See Figure 4.7-2 for the receiver locations.
[2] Total Project daytime operational noise levels as shown on Table 7-4 of Appendix H.
[3] Reference noise level measurement locations as shown on Exhibit 5-A of Appendix H.
[4] Observed daytime ambient noise levels as shown on Table 4.7-1 of Appendix H.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown in Section 4.7.5, above.
Source: (Urban Crossroads, 2023e, Table 7-8)

C. Operational Noise Impact Analysis – Off-Site Transportation Noise

Traffic generated by the operation of the Project will influence the traffic noise levels in surrounding off-site areas and at the Project site. As discussed in Section 4.8, *Transportation*, of this EIR, based on a comparison of the Project and the existing use, the Project is anticipated to generate net reduction of 178 two-way trips per day and net increase of 54 AM peak hour trips and 46 PM peak hour trips. The off-site Project-related traffic represents a reduction to the existing roadway volumes, which is not expected to generate a barely perceptible noise level increase of 3 dBA CNEL at nearby sensitive land uses adjacent to study area roadways, since a doubling of the existing traffic volumes would be required to generate a 3 dBA CNEL increase. Due to the decrease in traffic volumes generated by the Project, the off-site traffic noise levels generated by the Project are considered less than significant and no further analysis is required.

Threshold b: ***Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?***

A. Construction Analysis

Construction activities on the Project site would utilize construction equipment that has the potential to generate vibration. Vibration resulting from construction activities on the Project site were calculated at the same five receiver locations that were evaluated in the construction noise analysis (refer to Figure 4.7-2). Table 4.7-12, *Project Construction Vibration Levels*, summarizes Project construction vibration levels at the modeled receiver locations and the significance of the vibration levels using a vibration level significance threshold of 0.3 PPV (in/sec).

Table 4.7-12 Project Construction Vibration Levels

Receiver Location[1]	Distance to Construction Activity (Feet)[2]	Receiver Vibration Levels (VdB)[3]					Thresholds PPV (in/sec)[4]	Threshold Exceeded?[5]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Levels		
R1	813	0.000	0.000	0.000	0.000	0.001	0.3	No
R2	291	0.000	0.001	0.002	0.002	0.005	0.3	No
R3	79	0.001	0.006	0.014	0.016	0.037	0.3	No
R4	91	0.000	0.005	0.011	0.013	0.030	0.3	No
R5	1,002	0.000	0.000	0.000	0.000	0.001	0.3	No

[1]Noise receiver locations are shown on Exhibit 8-A of Appendix H.
[2] Distance from receiver building facade to Project construction boundary (Project site boundary).
[3] Based on the Vibration Source Levels of Construction Equipment (Table 4.7-5).
[4] Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
Source: (Urban Crossroads, 2023e, Table 8-5)

Table 4.7-12 presents the expected Project-related vibration levels at the nearby receiver locations. At distances ranging from 79 to 1,002 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.000 to 0.037 in/sec PPV. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels will satisfy the building damage thresholds at all the noise sensitive receiver locations. In addition, the typical construction vibration levels at the nearest sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site boundaries. Accordingly, Project construction would not generate excessive groundborne vibration or groundborne noise levels and impacts would be less than significant.

B. Operational Analysis

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible groundborne vibration beyond the Project Site. Trucks would travel to and from the Project Site along local roadways; however, vibration levels for heavy trucks operating at the posted speed limits on paved surfaces are not perceptible beyond the roadway. The Project would not result in the exposure of persons to excessive groundborne vibration or noise levels during long-term operation.

4.7.7 Cumulative Impact Analysis

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

impacts is divided into four general topics of discussion by combining the Thresholds of Significance (listed above in Subsection 4.7.5) into groupings of similar topics.

A. Substantial Noise Increase or Violations (Threshold a)

1. Short-Term Cumulative Construction-Noise Impacts

Construction activities associated with the Project, especially activities involving heavy equipment, would create intermittent periods of noise when construction equipment is in operation and cause a short-term increase in ambient noise levels. The peak noise level anticipated during construction activities are estimated to reach a maximum noise level of 74.7 dBA L_{eq} at receiver R3 which does not exceed the construction noise threshold of 80 dBA L_{eq}. Therefore, Project construction-related activities would result in less than significant noise impacts. A search of nearby projects within a half-mile radius around the Project site has been conducted and there are no known nearby construction projects that would occur at the same time as the Project construction. Because the Project's construction noise levels would be less than significant and construction noise would be temporary in nature, in addition to the fact that the Project and other cumulative projects would be required to comply with applicable noise standards to reduce potential construction-related noise level impacts, Project construction activities combined with foreseeable construction noise from nearby development would result in a less than cumulatively considerable increase in ambient noise levels in the Project study area.

2. Long-Term Cumulative Traffic-Related Noise Impacts

Due to the decrease in traffic volumes generated by the Project, the off-site traffic noise levels generated by the Project are considered less than significant, and therefore, would not be cumulatively-considerable under near- or long-term conditions.

3. Long-Term Cumulative Stationary Noise Impacts

As previously shown in Table 4.7-8, the proposed Project would not result in an increase in the cumulative noise levels at sensitive receiver locations. Thus, the Project's operational activities would not contribute to the creation of a significant long-term increase in noise levels above the ambient conditions and would not cause or contribute to the exposure of sensitive receptors to noise levels in excess of applicable standards. Furthermore, as shown on Figure 4.7-2, there are no cumulative development projects located in the immediate vicinity of the sensitive receivers (R1 through R5) that could generate new stationary noise impacts which (when combined with stationary noise generated by operation of the Project) could result in cumulatively considerable noise impacts. Accordingly, the Project would have less than significant direct and cumulative stationary operational noise impacts.

B. Groundborne Vibration and Groundborne Noise (Threshold b)

The types of construction equipment that would be used to implement the proposed Project would not create vibration amplitudes that could cause structural damage to nearby structures. The nearest existing off-site structures would not be exposed to substantial ground-borne vibration due to the

temporary operation of heavy construction equipment on the Project site. Under long-term operating conditions, the Project would not involve the use of equipment, facilities, or activities that would result in perceptible groundborne vibration. Therefore, the Project would not cumulatively contribute to vibration impacts caused by other development projects in the vicinity of the proposed Project. Additionally, the proposed Project as well as other cumulative projects would be required to comply with applicable noise standards to reduce potential ground-borne vibration and ground-borne noise impacts. Accordingly, groundborne vibration and noise impacts would be less than cumulatively considerable.

4.7.8 Significance of Impacts Before Mitigation

Threshold a: Less than Significant Impact. Noise generated by Project construction activities would result in a less than significant increase in ambient noise levels. During long-term operation of the Project, the Project would not expose persons to or generate noise levels in excess of local standards and would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Additionally, under long-term operation, Project-related traffic would not expose persons to or generate noise levels in excess of local standards and would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. Accordingly, the Project's long-term noise impacts would be less than significant.

Threshold b: Less than Significant Impact. The Project's construction and operational activities would not result in a perceptible groundborne vibration or noise.

4.7.9 Mitigation

Impacts would be less than significant; therefore, no mitigation is required.

4.7.10 Significance of Impacts after Mitigation

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

4.8 TRANSPORTATION

The following analysis is based primarily on a technical traffic study prepared by Urban Crossroads, titled *7400 Slauson Avenue Focused Traffic Assessment*, dated January 4, 2023 (Traffic Assessment). The Traffic Assessment is included as Appendix I1 to this EIR and a Vehicle Miles Traveled Assessment, dated January 5, 2023, is included as Appendix I2 to this EIR. Since preparation of the Traffic Assessment, the site plan has been refined and the Project now proposes a 292,029 s.f. warehouse or a decrease of 4,137 s.f. compared to the building size (296,166 sf) evaluated in the Traffic Assessment. Therefore, the trip generation prepared for the Project serves as a conservative analysis. Other information sources referenced to prepare this Subsection included the Commerce 2020 General Plan (City of Commerce, 2008), and the Los Angeles County Metropolitan Transportation Authority's Congestion Management Program (CMP) (LACMTA, 2010). Refer to Section 7.0 for a complete list of references.

A. Study Area Description

The Project site is located in the southwestern portion of the City of Commerce and is located south of Slauson Avenue, east of Greenwood Avenue, and north of the Pacific Electric Railroad. Interstate 5 (I-5) is located approximately 0.22 miles northeast of the Project site, and the Long Beach Freeway (Interstate 710 (I-710)) is located approximately 2 miles west of the Project site.

Currently, vehicular access to the Project site is from two driveways that abut the northern portions of the Project site located on Slauson Avenue at the northern edges of the Project site. One additional entryway provides access to the Project site on Greenwood Avenue at the intersection of Greenwood Avenue and Neenah Street. Sidewalks are present along both sides of Slauson Avenue and Greenwood Avenue.

The Project area is currently served by the City of Commerce Transport Department (CTD) and Los Angeles County Metropolitan Transportation Authority (Metro) which provides bus transportation services within the City of Commerce and into downtown Los Angeles. The nearest bus stop is located at the intersection of Slauson Avenue and Greenwood Avenue (serviced by the Metro 108 bus line), adjacent to the northeastern corner of the Project site, and at the intersection of Greenwood Avenue and Neenah Street (serviced by the City's Route 100 bus line).

4.8.1 EXISTING CONDITIONS

There are approximately 129 long-term employees employed by Gehr Industries on site and an unknown number of employees employed by various short-term tenants. Traffic counts were collected at the driveways for 7400 Slauson Avenue in Commerce, California on May 26 and May 27, 2021. As depicted in Table 4.8-1, *Existing Trip Generation*, the existing use currently generates 1,078 two-way trips per day, with 60 a.m. peak hour and 64 p.m. peak hour trips. The existing uses are part of the existing baseline and will therefore be factored into the analysis of the Project.

Table 4.8-1 Existing Trip Generation

Vehicle Type	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Day 1: May 26, 2021							
Passenger Cars:	30	15	45	5	33	38	655
Truck Trips:							
2-axle	1	1	2	3	2	5	86
3-axle	3	5	8	8	0	8	120
4+ axle	2	4	6	0	0	0	61
- Truck Trips (Actual Vehicles)	6	10	16	11	2	13	267
Total Trips (Actual Vehicles)[1]	*36*	*25*	*61*	*16*	*35*	*51*	*922*
Day 2: May 27, 2021							
Passenger Cars:	27	10	37	12	40	52	650
Truck Trips:							
2-axle	4	4	8	7	3	10	92
3-axle	3	8	11	5	1	6	128
4+ axle	0	2	2	8	0	8	64
- Truck Trips (Actual Vehicles)	7	14	21	20	4	24	284
Total Trips (Actual Vehicles)[1]	*34*	*24*	*58*	*32*	*44*	*76*	*934*
2-Day Average Trip Generation							
Passenger Cars:	29	13	41	9	37	45	653
Truck Trips:							
2-axle	3	3	5	5	3	8	89
3-axle	3	7	10	7	1	7	124
4+ axle	1	3	4	4	0	4	63
- Truck Trips (Actual Vehicles)	7	12	19	16	3	19	276
Total Trips (Actual Vehicles)[1]	***35***	***25***	***60***	***24***	***40***	***64***	***928***

[1] Total Trips = Passenger Cars + Truck Trips
Source: (Urban Crossroads, 2023f, Table 1)

A. Existing Circulation Network

1. City of Commerce

The Commerce 2020 General Plan Circulation Network is outlined in the Commerce 2020 General Plan Section 4.5 (City of Commerce, 2008). The Project is located in the Commerce Park Planning Area, which indicates the possible need for localized roadway and/or intersection improvements, with emphasis on traffic flow along Eastern Avenue, Slauson Avenue, and Garfield Avenue (City of Commerce, 2008, p. 66). The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area are defined by the Commerce 2020 General Plan Circulation Network. According to the Commerce 2020 General Plan Circulation Network, Slauson Avenue is designated as a major arterial. The main function of a Major Arterial is to provide regional, subregional, and intra-city travel service. Through-traffic comprises the bulk of traffic volumes on major arterial roadways. These streets typically provide three traffic lanes in each direction, and the lanes may be separated by either a median strip or a two-way, left-turn lane. Major arterial roadways

typically contain 84 feet of paving within a 100-foot right-of-way. Lanes are 12 feet wide, and the center median or turn lane is 16 feet wide. (City of Commerce, 2008, p. 63)

2. Los Angeles County

The City of Commerce is subject to the Los Angeles County Congestion Management Plan, or CMP, which is a state-mandated program with the passage of Assembly Bill 471. The CMP was created to: link land use, transportation, and air quality decisions; develop a partnership among transportation decision-makers in devising appropriate transportation solutions that include all modes of travel; and, propose transportation projects that are eligible to compete for State gas tax funds. The I-5 and I-710 ramps located in the City of Commerce are CMP-designated facilities(City of Commerce, 2008, p. 65).

4.8.2 REGULATORY FRAMEWORK

Senate Bill 743, adopted in December 2018, resulted in changes to California Environmental Quality Act (CEQA) Guidelines which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020.

The Governor's Office of Planning and Research (OPR) published an updated Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018, which provided guidance in evaluating transport impacts on VMT. The Technical Advisory provides details on appropriate screening thresholds which were used in establishing the screening threshold for the Project. Based on OPR's Technical Advisory, the County of Los Angeles has prepared its Transportation Impact Analysis Guidelines. Based on consultation with the City of Commerce, City-adopted VMT analysis guidelines and thresholds are not yet available, therefore, the analysis in this section has utilized the County Guidelines for the review of screening criteria, which are in accordance with OPR's Technical Advisory.

A. Los Angeles County Congestion Management Program

The Los Angeles County Congestion Management Program (CMP) was a state-mandated program that was enacted by the California Legislature with the passage of Proposition 111 in 1990. The purpose of the CMP was to address the impacts of local growth on the regional transportation system. The CMP was created to link local land use decisions with their impacts on regional transportation and air quality as well as to develop a partnership among transportation decision makers on devising appropriate transportation solutions that include all modes of travel. According to the CMP, operations analysis (traffic study) may not be required if the AM or PM peak hour trip generation is less than 50 vehicle trips,

4.8.3 METHODOLOGY

The Traffic Assessment, included in Appendix I1 of this EIR, was prepared in accordance with the County of Los Angeles Traffic Impact Analysis Report Guidelines (TIA) adopted July 23, 2020 and Appendix D of the 2010 Los Angeles County Congestion Mangement Program (CMP). A VMT

Assessment Memorandum was prepared in accordance with OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA published in December 2018 and County's TIA and included in Appendix I2 of this EIR.

A. Trip Generation Rates

The trip generation rates used for the analysis in this subsection are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in the Trip Generation Manual (11th Edition, 2021). For purposes of analysis, the following ITE land use codes and vehicle mixes have been utilized:

- ITE land use code 110 (General Light Industrial) has been used to derive site-specific trip generation estimates for up to 118,466 square feet. A light industrial facility is a free-standing facility devoted to a single use that has an emphasis on activities other than manufacturing. Typically, there is minimum office space. The vehicle mix has also been obtained from the ITE's Trip Generation Manual. The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%.

- ITE land use code 150 (Warehousing) has been used to derive site specific trip generation estimates for up to 177,700 square feet of the Project. A warehouse is primarily devoted to the storage of materials but may also include office and maintenance areas. The vehicle mix has also been obtained from the ITE's Trip Generation Manual. The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%.

The preliminary site plan for the Project is shown on Figure 3-1, *Site Plan*. The Project consists of a single speculative 296,166 square foot warehouse and office building. Because the future tenant is unknown, the trip generation rates and forecast of the vehicular trips used in this EIR are considered "conservative" and overestimates Project trips. The General Light Industrial trip rate is among the highest rates published in the ITE Trip Generation Manual for industrial and warehousing land uses. Thus, the assumption in this EIR that 40% of the building will be light industrial uses overestimates the number of trips that will be generated as compared to "real world" conditions which will likely reflect reduced trips as compared to what this EIR assumes. Several environmental analyses throughout this EIR rely on trip generation. By using a conservative trip rate selection, Project average daily trips and peak hour trips are likely overestimated and provide a conservative approach for the analyses related to air quality, greenhouse gas emissions, energy, noise, and transportation.

As shown on Table 4.8-2, *Project Trip Generation Summary*, the Project is anticipated to generate a total of 886 trip-ends per day with 114 AM peak hour trips and 110 PM peak hour trips.

Table 4.8-2 Project Trip Generation Summary

Land Use	Quantity	Units[1]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Proposed Project									
General Light Industrial (40%)	118.466	TSF							
Passenger Cars:			71	10	86	10	66	76	548
Truck Trips									
2-axle:			0	0	0	0	0	0	6
3-axle:			0	0	0	0	0	0	6
4+ axle:			0	0	0	0	0	0	20
- Truck Trips			0	0	0	0	0	0	32
Warehousing (60%)	177.700	TSF							
Passenger Cars:			21	5	26	6	21	27	198
Truck Trips									
2-axle:			0	0	0	1	0	1	18
3-axle:			0	0	0	1	1	2	22
4+ axle:			1	1	2	2	2	4	68
- Truck Trips			1	1	2	4	3	7	108
Total Trips (Actual Vehicles)[2]			***98***	***16***	***114***	***20***	***90***	***110***	***886***
Existing Use									
Passenger Cars:			29	13	41	9	37	45	653
Total Truck Trips			7	12	19	16	3	19	276
Total Trips (Actual Vehicles)[2]			***35***	***25***	***60***	***24***	***40***	***64***	***928***
Net Trips									
Passenger Cars:			69	3	71	8	51	58	94
Total Truck Trips			-6	-11	-17	-12	0	-12	-136
Total Trips (Actual Vehicles)[2]			***63***	***-9***	***55***	***-4***	***51***	***47***	***-42***

[1] TSF = thousand square feet
[2] Total Trips = Passenger Cars + Truck Trips
Source: (Urban Crossroads, 2023f, Table 3)

Based on a comparison of the Project and existing use, the Project is anticipated to generate net reduction of 42 two-way trips per day and net increase of 55 AM peak hour trips and 47 PM peak hour trips. According to the TIA and CMP Guidelines, operations analysis (traffic study) may not be required if the AM or PM peak hour trip generation is less than 50 vehicle trips, and the Project generates fewer than 110 net new (two-way) trips per day. Although the Project is anticipated to generate 55 net new AM peak hour trips, the distribution of these trips between the various proposed Project driveways would result in a net contribution of fewer than 50 peak hour trips to any site adjacent and off-site intersections. Based on the traffic study guidelines and the anticipated net trips for the site, additional traffic analysis beyond the trip generation assessment is not necessary.

B. Screening VMT Threshold

Based on consultation with the City of Commerce, City-adopted VMT analysis guidelines and thresholds are not yet available, therefore, this evaluation has utilized the County of Los Angeles

Transportation Impact Analysis Guidelines (Guidelines) for the review of screening criteria, which are in accordance with the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

Projects that meet certain screening criteria based on their location and project type may be presumed to result in a less than significant transportation impact. The following screening criteria has been selected for evaluation based on their applicability to the Project.

1. Non-Retail Project Trip Generation Screening

The Guidelines identify that small projects anticipated to generate low traffic volumes (i.e., fewer than a net increase of 110 daily trips) are presumed to have a less than significant impact absent substantial evidence to the contrary.

2. Proximity to Transit Based Screening

Projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor") may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

4.8.4 Basis for Determining Significance

Section XVII of Appendix G to the CEQA Guidelines addresses typical adverse effects to transportation, and includes the following threshold questions to evaluate the Project's impacts on transportation (AEP, 2021):

a. *Would the Project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

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

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

d. *Result in inadequate emergency access?*

The Project's Initial Study (Appendix A) evaluated the Project's potential transportation impact related to emergency access. The Project site has been designed to incorporate all applicable design and safety

requirements from the most current adopted fire codes, building codes and nationally recognized fire and life safety standards of the City and Los Angeles County Fire Department. Further, during the building plan check and development review process, the City would coordinate with the Los Angeles County Fire Department to ensure that the necessary fire prevention and emergency response features are incorporated into the Project, and that adequate circulation and access (e.g., adequate turning radii for fire trucks) is provided in the traffic and circulation components of the Project. Accordingly, impacts have been determined to be less than significant, and analysis in this EIR section will not include threshold (d.

4.8.5 IMPACT ANALYSIS

Access to the Project site would be provided by two driveways along North Slauson Avenue to the north and two driveways along Greenwood Avenue to the east. The first driveway, intended for both truck traffic and vehicle traffic, would be located at the northwest corner of the Project site along Slauson Avenue. The second driveway, east of the first driveway along Slauson Avenue, is intended for vehicle traffic only. The third driveway, along Greenwood Avenue located slightly to the north of the center of the proposed eastern boundary, is intended for vehicle traffic only. The fourth driveway along Greenwood Avenue, located south of the third driveway at the southeast corner of the Project boundary, is intended for both truck traffic and vehicle traffic. Truck traffic would enter from either the northwest or southeast corner of the Project site and would follow the perimeter of the proposed building. Loading activities would be conducted at the rear of the building, shielded from view from the adjacent streets.

Threshold a: ***Would the Project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

The Project would be subject to compliance with the Commerce 2020 General Plan Transportation Element. Applicable policies pertaining to the Project contained therein are assessed in Table 4.8-3, *Transportation Policy Consistency Analysis*. As demonstrated, the Project would not conflict with the City's Transportation Element[1], and impacts associated with conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant.

Table 4.8-3 Transportation Policy Consistency Analysis

Policy #	General Plan Policy Text	Project Consistency
Transportation Policy 1.1	*The City of Commerce will continue to implement a comprehensive plan for a coordinated street circulation system that will*	**No conflict.** The Project would generate a net reduction of 42 trip ends per day and would

[1] A number of Transportation Policies in the General Plan are not included in Table 4.8-4. Policies excluded from analysis are either not applicable to the Project and/or will not have any potential to be affected by any Project activities.

Policy #	General Plan Policy Text	Project Consistency
	provide for the safe and efficient movement of people and goods.	therefore have minimal effect on the existing street circulation system.
Transportation Policy 1.4	*The City of Commerce will implement the applicable standards for local roadways specifically serving industrial developments in the city.*	**No conflict.** As a standard condition of approval, the Project would be compliant with all applicable provisions in the Commerce Municipal Code, including Section 19.11 (relating to Manufacturing Zones) and Title 10 (relating to Vehicles, Traffic, and Parking)
Transportation Policy 1.6	*The City of Commerce will continue to support the operation of, and further the enhancement of, a safe and efficient regional and inter-city transit system.*	**No conflict.** See response to Transportation Policy 1.1. Furthermore, trucks entering or exiting the Project site would be required to travel on designated truck routes.
Transportation Policy 1.8	*The City of Commerce will continue to analyze traffic congestion and evaluate strategies to improve the efficiency of the city transportation and circulation system.*	**No conflict.** See response to Transportation Policy 1.1, above.
Transportation Policy 2.1	*The City of Commerce will evaluate plans that will promote the separation of commercial and industrial development traffic from residential neighborhoods.*	**No conflict.** The Project site is zoned as Heavy Manufacturing which would permit the Project's foreseeable warehouse uses. Industrial development traffic associated with the Project would utilize designated truck routes to access the nearby I-710 and I-5 Freeways, minimizing routes through residential neighborhoods.
Transportation Policy 2.2	*The City of Commerce will prohibit truck traffic from using local streets located within, and exclusively serving, the residential neighborhoods.*	**No conflict.** Industrial development traffic associated with the Project would utilize designated truck routes to access the nearby I-710 and I-5 Freeways and would not route through local streets within or exclusively serving, residential neighborhoods.
Transportation Policy 2.3	*The City of Commerce will establish truck routes in the city*	**No conflict.** The Project would comply with all City-designated truck routes.
Transportation Policy 2.4	*The City of Commerce will seek out means to assess heavy truck users for the cost of maintaining road way related infrastructure.*	**No conflict.** The Project would generate a net reduction of 42 truck trip-ends and the Project Applicant will pay all applicable fees.
Transportation Policy 3.1	*The City of Commerce will continue to encourage the use of alternate transportation modes (e.g., shuttles, etc.).*	**No conflict.** The Project would promote the use of alternate transport modes. Future potential employees would have the option to utilize existing City Municipal Bus Lines. The nearest bus stop is located at the intersection

Policy #	General Plan Policy Text	Project Consistency
		of Slauson Avenue and Greenwood Avenue (serviced by the Metro 108 bus line), which is located northeastern corner of the Project site. Furthermore, the Project would install 11 short-term and 11 long-term bike parking spaces.
Transportation Policy 3.5	*The City of Commerce will encourage the maintenance and improvement of "pedestrian-safe" oriented facilities to ensure safe pedestrian movement.*	**No conflict.** As discussed in the analysis for threshold c), the Project would provide adequate visibility for vehicular and pedestrian traffic.
Transportation Policy 4.4	*The City of Commerce will evaluate the feasibility of levying license fees for all trucks using city roads to pay for the cost of associated road repairs.*	**No conflict.** See response to Transportation Policy 2.4, above.
Transportation Policy 5.1	*The City of Commerce will ensure that adequate off-street parking and loading facilities are provided for businesses and residences in the city.*	**No conflict.** The Project will provide a total of 224 automobile parking stalls and 63 truck trailer parking stalls. Parking stalls have been designed to be compliant with Commerce Municipal Code Section 19.21.040 which regulates numbers of required parking spaces.
Transportation Policy 5.3	*The City of Commerce will require all new developments to provide on-site parking in compliance with existing zoning regulations.*	**No conflict.** See response to Transportation Policy 5.1, above.

Threshold b: ***Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

As discussed above, projects that meet certain screening criteria based on their location and project type may be presumed to result in a less than significant transportation impact. Consistent with the screening criteria identified in the Guidelines, the following screening criteria has been selected for evaluation based on their applicability to the Project:

- Non-Retail Project Trip Generation Screening
- Proximity to Transit Based Screening

A land use project need only meet one of the above screening criteria to result in a less than significant impact.

The Guidelines identify that small projects anticipated to generate low traffic volumes (i.e., fewer than a net increase of 110 daily trips) are presumed to have a less than significant impact. The Project is

anticipated to generate 886 total vehicle trip-ends per day. This estimate was derived using a conservative split in trip generation rates assuming 40% of the building square footage as general light industrial use and 60% of the building square footage as warehousing use. Comparatively, the existing industrial warehouse was surveyed to establish the baseline level of trip generation. The existing warehouse building was surveyed over two consecutive days and the average number of trips per day was calculated as 928 vehicle trip-ends per day. The Project would result in a net reduction of 42 daily vehicle trips. Therefore, the Project would not exceed the trip generation threshold of 110 net new daily vehicle trips and the Non-Retail Project Trip Generation screening criteria is met.

Additionally, the Guidelines identify projects located within a TPA (i.e., within ½ mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor"), may be presumed to have a less than significant impact absent substantial evidence to the contrary. Based on map screening, the Project is located within a high-quality transit corridor. However, the Project as designed does not meet the secondary criteria related to FAR and parking supply, therefore, the Project would not be eligible to screen out based on proximity to transit (Urban Crossroads, 2023g).

Based on the review of applicable VMT screening criteria, the Project meets the Non-Retail Project Trip Generation screening criteria. Therefore, the Project would result in a less than significant impact on VMT.

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

The Project's potential to increase hazards as a result of a geometric design feature has been assessed to provide adequate truck access/circulation. The Project's circulation plan has been designed to be compatible with all foreseeable vehicles. Access to the Project site will be provided by two driveways along Slauson Avenue to the north and two driveways along Greenwood Avenue. Due to the typical wide turning radius of large trucks, a truck turning template has been overlaid on the site plan at each applicable Project driveway anticipated to be utilized by heavy trucks in order to determine the appropriate curb radii and to verify that trucks will have sufficient space to execute turning maneuvers A WB-67 truck (53-foot trailer) has been utilized for the purposes of this analysis. As shown in Exhibit 6, Truck Access, of the Traffic Assessment (Appendix I1 of this EIR), the westerly driveway on Slauson Avenue and southerly driveway on Greenwood Avenue are both 40 feet wide and the driveways as currently designed are anticipated to accommodate the ingress and egress of heavy trucks. (Urban Crossroads, 2023f, p. 10)

Horizontal sight distance has been evaluated for the Project driveways along Slauson Avenue based on Table 3-1 of the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements. Sight distance is the continuous length of highway ahead visible to the driver.

At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. For the purposes of this analysis, a 7.5 second criterion[2] has been applied to the outside travel lanes in either direction to provide the most conservative sight distance. The 7.5 second criterion allows waiting vehicles to either cross all lanes of through traffic by turning left or cross the near lanes by turning right without requiring through traffic to radically alter its speed. Vertical sight distance has been evaluated utilizing a 3.5-foot eye height and a 4.25-foot object height. The sight distance is based on the posted speed limit.

It is anticipated that the minimum 360-foot sight distance could be accommodated at both the western and eastern driveways along Slauson Avenue, based on a speed limit of 45 miles per hour. Adequate visibility for vehicular and pedestrian traffic can be provided at each driveway by limiting sight obstructions within the limited use area. Any landscaping/hardscape within the limited use area shall not exceed 30-inches (2.5-feet) in height. The limited use area shall be kept clear of any landscaping or any other obstructions that may impede the visibility of the driver, including on-street parking. Proposed red curbs are also marked in order to maintain adequate visibility from the Project driveways on Slauson Avenue. The Project's construction drawings will identify the limited use area and line-of-site requirements, as identified on Figure 4.8-1, *Sight Distance*. Additionally, the City will impose a standard condition of approval to re-evaluate the sight distance in the field once the driveway has been constructed to ensure adequate visibility. (Urban Crossroads, 2023f)

The Project area is generally characterized by industrial and residential uses. Traffic generated by the Project would be typical of an industrial development and be compatible with the type of traffic generated by the existing and surrounding development. In addition, all proposed improvements within the public right-of-way would be installed in conformance with City design standards. The City of Commerce Public Works Department reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced by the Project. At the time of final grading, landscape, and street improvement plans, the City will review project access points to ensure adequate sight distance. Accordingly, the Project would not create or substantially increase safety hazards due to a design feature or incompatible use and impacts would be less than significant.

4.8.6 CUMULATIVE IMPACT ANALYSIS

The Project would result in a less than significant impact to transportation. As discussed above, the Project would be consistent with relevant plans, ordinances, and policies. Further, the Project does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. Cumulative projects would be expected to comply with all applicable relevant plans, ordinances, and policies. Therefore, no cumulative impact would occur.

[2] For example, a car turning at the intersection would be provided intersection sight distance equivalent to a time gap of 7.5. Time gas are a function of the distance a vehicle must travel to execute its intended maneuver.

Similar to the Project, cumulative projects would be required to analyze and mitigate their respective impacts relating to VMT. The Project is below the applicable VMT impact thresholds and would align with State and regional long-term VMT and GHG reduction goals. Therefore, the Project would not contribute to a cumulative VMT impact. Therefore, the Project's VMT would not be cumulatively considerable.

4.8.7 Significance of Impacts Before Mitigation

Threshold a: Less Than Significant. The Project would be consistent with all applicable policies identified in the City of Commerce General Plan. Accordingly, impacts would be less than significant.

Threshold b: Less than Significant. The Project is anticipated to result in a net reduction of 42 daily vehicle trips. Therefore, the Project would not exceed the County's trip generation threshold of 110 net new daily vehicle trips and the Non-Retail Project Trip Generation screening criteria is met. Accordingly, impacts would be less than significant.

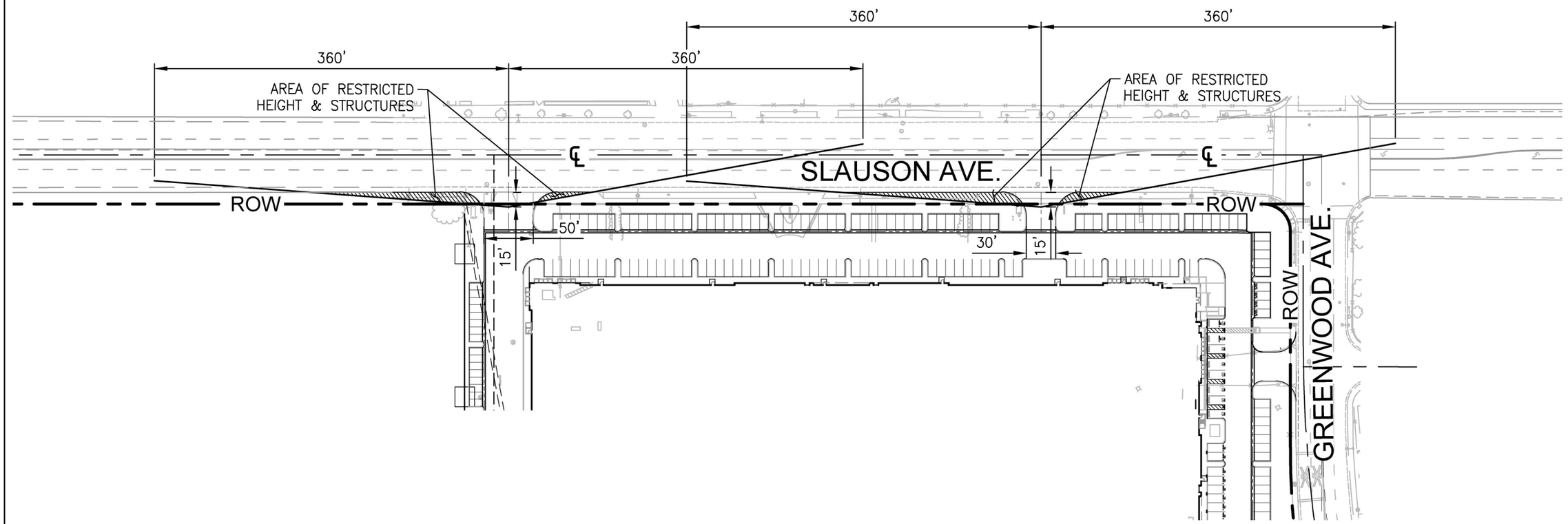
Threshold c: Less than significant. The Project intersections have been assessed for truck and auto access and circulation and do not pose a hazard due to a geometric design feature or incompatible uses. Accordingly, impacts would be less than significant.

4.8.8 Mitigation

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

4.8.9 Significance of Impacts after Mitigation

Impacts would be less than significant.



Source(s): Fuscoe Engineering (01-24-2023)

Figure 4.8-1

Not to Scale

Sight Distance

4.9 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection is based on a site-specific cultural resources assessment report titled *Paleontological Assessment for the 7400 East Slauson Avenue Project* (the Paleontological Resources Study) (dated July 9, 2021) and a cultural resources assessment report titled *Cultural Resources Study for the 7400 East Slauson Avenue Project* (the Cultural Resources Study) (dated July 14, 2021). The reports were prepared by Brain F. Smith and Associates, Inc (BFSA) and are included as Appendix E2 and Appendix C, respectively.

The following analysis of potential tribal cultural resources pertaining to the Project site is based primarily on the Cultural Resources Study performed by BFSA. All references used in this Subsection are included in EIR Section 7.0, *References.* Written and oral communication between Native American tribes and the Lead Agency is considered confidential with respect to places that have traditional tribal cultural significance (Government Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Section, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (California Code of Regulations (CCR). § 15120(d)).

4.9.1 EXISTING CONDITIONS

A. Cultural Setting

The information provided below is a summary of the Existing Conditions information provided in Subsection 4.2, *Cultural Resources* of this EIR. Please refer to Section 4.2.1 for a detailed discussion of the Project's prehistoric and historic setting.

1. Prehistoric Period Setting

According to the earliest available ethnographic data, the Gabrielino (Tongva) were the major tribe established in the Project area as of the late Holocene period (circa 3,000 YBP). Gabrielino territory included the watersheds of the San Gabriel, Santa Ana, and Los Angeles rivers, portions of the Santa Monica and Santa Ana mountains, the Los Angeles basin, the coast from Aliso Creek to Topanga Creek, and San Clemente, San Nicolas, and Santa Catalina islands. The Gabrielino spoke a Cupan language that was part of the Shoshonean or Takic family of Uto-Aztecan linguistic stock; these linguistic ties united a disperse ethnic group occupying 1,500 square miles in the Los Angeles basin region. (BFSA, 2021a, p. 1.0-6, -7)

Gabrielino were hunters and gatherers whose food sources included acorns, seeds, marine mollusks, fish, and mammals; archaeological sites support this data, with evidence of hunting, gathering, processing, and storage implements including arrow points, fishhooks, scrapers, grinding stones, and basketry awls. Santa Catalina Island provided a valuable source of steatite for the Gabrielino, which they quarried and traded to other groups. About 50 to 100 permanent villages are estimated to have been in existence at the time of European contact, most of which were located along lowland rivers

and streams and along sheltered areas of the coast. Village sites contained varying types of structures, including houses, sweathouses, and ceremonial huts. Artistic items included shells set in asphaltum, carvings, painting, steatite, and baskets. Settlements were often located at the intersection of two or more ecozones, thus increasing the variety of resources that were immediately accessible. Offshore fishing and hunting were accomplished with the use of plank boats, while shellfish and birds were collected along the coast. At the time of European contact, the Gabrielino, second only to the Chumash, were the wealthiest, most populous, and most powerful ethnic group in southern California. (BFSA, 2021a, p. 1.0-7)

As with other Native American populations in southern California, the arrival of the Spanish drastically changed life for the Gabrielino. Incorporation into the mission system disrupted their culture and changed their subsistence practices. Ranchos were established throughout the area, often in major drainages where Native American villages tended to be located. By the early 1800s, Mission San Gabriel had expanded its holdings for grazing to include much of the former Gabrielino territory. Eventually, widespread relocation of Native American groups occurred, resulting in further disruption of the native lifeways. With the introduction of Euro-American diseases, the Gabrielino and other groups of southern California experienced drastic population declines. In the early 1860s, a smallpox epidemic nearly wiped out the remaining Gabrielino population. While people of Gabrielino descent still live in the Los Angeles area, the Gabrielino were no longer listed as a culturally identifiable group in the 1900 Federal Census. (BFSA, 2021a, p. 1.0-7)

Refer to EIR Subsection 4.2.1 and the Cultural Resources Study (Appendix C) for a more detailed discussion about the prehistoric cultural periods in the Project area.

4.9.2 REGULATORY FRAMEWORK

A. California Public Resources Code

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

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

California Public Resources Code Section 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that "No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine… except

on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres."

B. California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code Section 7050.5, which states that "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation…until the coroner…has determined…that the remains are not subject to…provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible…. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

C. California Register of Historical Resources

The California Register of Historic Resources is the state version of the National Register of Historic Resources program (see also Section 4.3, *Cultural Resources*). It was enacted in 1992 and became official January 1, 1993. The California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to Public Resources Code Section 5024.1(c), a resource may be listed as a historical resource in the California Register if it meets any of the four National Register criteria.

D. Assembly Bill 52

The Native American Historic Resource Protection Act (Assembly Bill 52 or AB 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCRs) into the CEQA process. Under AB 52, tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. Alternatively, the lead agency may choose at its discretion to treat the resource as a tribal cultural resource when supported by substantial evidence.

AB 52 requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. AB 52 requires consultation with tribes at an early stage to determine whether the project would have an adverse impact on a TCR and define mitigation to protect them. Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested in writing to be notified. The tribe then has 30 days from receiving the notification to respond if it wishes to engage in consultation. The lead agency must initiate consultation within 30 days of receiving the request from the tribe. Consultation concludes when both parties have agreed on measures

to mitigate or avoid a significant effect to a TCR, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c).

4.9.3 METHODOLOGY

BFSA performed an investigation of the Project site which included a review of an archaeological records search performed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton in order to determine the presence of historical and archeological resources (Appendix C). Furthermore, a review of the Sacred Lands Files (SLFs) by the Native American Heritage Commission (NAHC) was performed. The NAHC SLF search did not indicate the presence of a sacred site within the search radius.

In accordance with the provisions of AB 52, the City sent formal notification letters to Tribes on February 10, 2022. The letter included a brief description of the Project and its location and Tribes were asked to convey any knowledge regarding prehistoric or Native American resources (archaeological sites, sacred lands, or artifacts) located within the study area or surrounding vicinity. The 30-day noticing requirement under AB 52 was completed March 12, 2022. The City received a response from one of the tribes (Gabrieleno-Kizh Nation) requesting consultation. Tribes contacted for purposes of the Native American consultation are provided below.

4.9.4 BASIS FOR DETERMINING SIGNIFICANCE

According to Section XVII of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to tribal resources if the Project or any Project-related component would:

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

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

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

The significance thresholds above were used to evaluate the significance of the proposed Project's impacts to tribal cultural resources.

4.9.5 IMPACT ANALYSIS

Threshold a:	***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

The Project site is currently developed with 249,579 sf of existing structures, associated on-site landscaping, and associated on-site parking. Existing structures include one primary 233,260 sf warehouse and office building, and five ancillary structures which range from 694 sf to 6,750 sf. The existing on site facility operates as a warehouse and office building for Gehr Industries. The property was previously impacted by the development of the structures and associated hardscape, as well as the general development of the area over the past 100 years. As documented in Section 4.2, *Cultural Resources*, of this EIR, the existing buildings are not considered historical resources, and there are no known prehistoric cultural resources present on the Project site (BFSA, 2021a, p. 3.0-45). Furthermore, no sites, features, places, or landscapes were identified that are either listed or eligible for listing in the California Register of Historic Places (CRHR).

A. Sacred Lands File Search Results

A Sacred Lands File search was conducted by NAHC to determine if any sacred lands or traditional cultural properties had been identified on or near the Project site. The NAHC SLF search did not indicate the presence of a sacred site within the search. Additionally, a review of the records search provided by the SCCIC indicated that no previously recorded resources are located within the Project site.

B. AB 52 Consultation Results

Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the lead agency (City of Commerce) during the project planning process to identify and protect TCRs.

The provisions of CEQA, Public Resources Code Sections 21080.3.1 et seq. (also known as AB 52), requires meaningful consultation with California Native American Tribes on potential impacts to TCRs, as defined in Public Resources Code Section 21074. In accordance with the provisions of AB 52, the City sent formal notification letters on February 10, 2022, to the following tribes:

- Soboba Band of Luiseño Indians; and
- Gabrieleno Band of Mission Indians – Kizh Nation.

The letter included a brief description of the Project and its location. The 30-day noticing requirement under AB 52 was completed March 12, 2022. The City received a response from one of the tribes (Gabrieleno-Kizh Nation) requesting consultation. The City scheduled an appointment for consultation with the Tribe on October 21, 2022.

A review of the records search provided by the SCCIC indicated that no previously recorded resources are located within the subject property. However, because the Project would require excavation for construction into previously undisturbed soils, there is a potential to uncover tribal cultural resources during excavations. Therefore, while unlikely, the presence of subsurface tribal cultural resources on the Project Site remains possible, and these could be affected by ground-disturbing activities associated with grading at the Project Site.

4.9.6 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site that have a potential for uncovering tribal cultural resources as defined by Public Resources Code Section 21074. Impacts relating to tribal cultural resources impacts are site-specific and addressed on a site-by-site basis. Therefore, while there is a potential for an impact on a specific site, the impact would not ordinarily extend beyond the site or immediately surrounding area. There could be circumstances in which a tribal cultural resource extends over more than one property, but in that event, there could be a cumulative effect only if all affected properties were in the process of being developed and physical alterations to the ground were proposed in all of those projects. There are no adjacent related projects that could potentially result in effects to unknown tribal cultural resources that may lie in the subsurface of the Project site; therefore, there would be no cumulative impacts affecting tribal cultural resources.

4.9.7 Significance of Impacts Before Mitigation

Threshold a: Significant Impact. Although no tribal cultural resources are known to occur within the Project's impact limits, grading activities have the potential to uncover previously undiscovered tribal cultural resources buried in native soils.

4.9.8 Mitigation

MM 4.9-1 Prior to the issuance of a grading permit, the applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with

the City during the AB 52 process. The applicant shall coordinate with the Tribe(s) to develop a Tribal Monitoring Agreement(s). A copy of the agreement shall be provided to the City of Commerce Planning Department prior to the issuance of a grading permit.

If a significant tribal cultural resource is discovered on the property, ground disturbing activities shall be suspended 50 feet around the resource(s). A representative of the appropriate Native American Tribe(s), the Project Applicant, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented to protect the identified tribal cultural resources from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resources(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the tribal cultural resources in accordance with current professional archeology standards. The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery and shall require that all recovered artifacts undergo basic field analysis and documentation or laboratory analysis, whichever is appropriate. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered tribal cultural resources shall be processed and curated according to current professional repository standards. The collection and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the City of Commerce. A final report containing the significance and treatment findings shall be prepared by the archeologist and submitted to the Commerce Planning Department and the appropriate Native American Tribe.

4.9.9 Significance of Impacts After Mitigation

Threshold f: Less Than Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.9-1 would ensure that grading and other ground-disturbing activities during construction are monitored by tribal monitors and a tribal monitoring agreement be prepared. The mitigation measures further require the proper treatment of any resources that may be uncovered, and the avoidance of disturbance in areas where potential resources are uncovered. With implementation of the required mitigation measures, the Project would not 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 potential Project and impacts would be reduced to less than significant levels.

5.0 OTHER CEQA CONSIDERATIONS

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

The Project would not result in any significant and unavoidable impacts on the environment. All the Project's potentially significant impacts incorporate mitigation measures that reduce the Project's impacts to a less than significant level.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROJECT SHOULD IT BE IMPLEMENTED

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved with the proposed action should it be implemented (CEQA Guidelines §15126.2(d)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the Project could result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. There are no non-renewable resources present at the Project site; therefore, conversion of the land from its current state, developed with two office buildings, would have no direct effect on any such resources at the Project site.

Natural resources in the form of construction materials and energy resources would be used in the construction of the Project, but the redevelopment of the Project site as proposed would have no measurable effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the Project would not involve the use of large sums or sources of renewable energy. Additionally, the Project is required by law to comply with the City of Commerce Green Building Code, compliance with which reduces a building operation's energy volume that is produced by fossil fuels. A more detailed discussion of energy consumption is provided in the EIR's Subsection 4.3, *Energy*.

On-site activities would include but not be limited to warehousing and distribution/storage of materials and products, along with ancillary office spaces. Non-renewable natural resources that would be consumed over the operating life of the Project could include fuels (petroleum and natural gas) for both on-site workers who would commute to the Project site and for the commercial vehicles that would deliver goods to/from the Project site. Depending on the specific occupants of the Project's future buildings, various non-renewable natural resources could be consumed during operations, including metals (such as lead, copper etcetera). The consumption of non-renewable resources to construct and

operate the Project over the long-term would likely commit subsequent generations to the same use of the land and similar patterns of energy consumption. However, the Project site is currently in operation and future operations could continue under the existing use or by a future tenant. Additionally, the Project is not expected to reduce the availability of any natural resources associated with long-term operational activities.

EIR Subsection 4.6, *Hazards and Hazardous Materials*, provides an analysis of the Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage to the environment. As concluded in the analysis, compliance with federal, State, and local regulations related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all occupants that occupy the Project's building. As such, construction and long-term operation of the Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

As demonstrated in the analysis presented throughout EIR Section 4.0, implementation of the Project would not result in significant and unavoidable environmental effects that cannot be feasibly reduced to below levels of significance (refer to EIR Subsection 5.1).

The Project site is in a portion of the City that is surrounded by uses that are compatible with the industrial use proposed by Project Applicant. Specifically, land located to the north are various industrial, warehousing, and manufacturing uses. The land east of the Project site are commercial uses at the northeast corner of Greenwood Avenue and East Slauson Avenue and residential uses east of Greenwood Avenue. To the south of the Project site is the Pacific Electric Railroad line with single and medium density residences further south. The Greenwood Community Church and the Villa Del Rio Convalescent Center are located south of the Project site along East Gage Avenue. To the west of the Project site are various commercial and industrial buildings. Use of the Project site as a warehouse facility is compatible with surrounding development and the Project would not create any primary or secondary effects that would preclude the use of surrounding properties for their existing and intended uses.

5.3 GROWTH-INDUCING IMPACTS OF THE PROJECT

CEQA requires a discussion of how the Project could be growth-inducing. The CEQA Guidelines identify a project as growth-inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines §15126.2(e)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area, placing additional demands on public services and infrastructure systems, and in the generation of a variety of environmental impacts, which are addressed throughout Section 4.0, *Environmental Analysis*, of this EIR.

A project could indirectly induce growth at the local level by increasing the supply for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environs where population growth results in increased demand for service and commodity markets responding to the new population of residents or employees. The Project's construction-related and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs is expected to be marginal, accommodated by existing goods and service providers, and would not result in any new physical impacts to the environment based on the amount of available commercial and retail services available in areas near the Project site, including the cities of East Los Angeles, Montebello, Bell Gardens, and Pico Rivera. In addition, the Project would create jobs consistent with growth projections for the City and would serve the housing units either already built or planned for development within Los Angeles County and/or the City of Commerce. Furthermore, the Project site is currently occupied by operating buildings and associated employment. Accordingly, the on-site employment generation would not induce substantial growth in the area.

The City's General Plan land use designation for the Project site is Industrial. The land adjacent to the Project site to the north across Slauson Avenue, south, and west have the same General Plan land use designation of Industrial. The land adjacent to the Project site to the west, south, and north across Slauson Avenue have a land use designation of Industrial. The land east of the Project site, opposite of Greenwood Avenue, has a General Plan land use designation of Medium Density Residential and is developed with single family homes. Industrial buildings surround the Project site to the north, south, and west. The Project is limited to the Project site's boundaries and does not include any components that would indirectly affect existing or planned uses on neighboring properties. Accordingly, the Project would not induce growth in the Project area. The development of the proposed Project would not reasonably or foreseeably cause the redevelopment of other properties or cause development on other properties.

Furthermore, the Project's potential influence on other nearby properties to redevelop at greater intensities and/or different uses than the City's General Plan and Zoning Code allow is speculative beyond the rule of reason. CEQA does not require the analysis of speculative effects (CEQA Guidelines §15145). If any other property owner were to propose development or redevelopment of a property in the Project vicinity or any part of the City, the Project would require evaluation under CEQA based on its own merits, including an analysis of direct and cumulatively considerable effects.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as SCAG. Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or

indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

The Project would be consistent with the existing General Plan land use designation (Industrial) and Zoning classification (Heavy Industrial) for the Project site. The operation and maintenance of the Project would generate jobs, but any potential growth-inducing impact of the employment of persons at the Project site was accounted for in the City's General Plan and would be offset by the existing employees on-site, as the Project would develop the Project site in compliance with the City's General Plan Land Use designation. The Project would not directly promote growth either at the Project site or at the adjacent and surrounding properties that were not accounted for in the City's General Plan. Additionally, the Project would not construct infrastructure that would accommodate additional growth by those permitted by local and regional plans.

In conclusion, it is unlikely, speculative, and not reasonably foreseeable that the Project would induce growth in the form of additional economic activity or employment that would result in significant impacts on the off-site physical environment.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE INITIAL STUDY PROCESS

The Initial Study prepared for the proposed Project in April 2022 determined that impacts listed below would be less than significant. Consequently, they have not been further analyzed in this EIR. Please refer to Appendix A for explanation of the basis of these conclusions. Impact categories and questions below are summarized directly from the CEQA Environmental Checklist, as contained in the Initial Study.

Table 5-1 Impacts Found Not to Be Significant

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

Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:	
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant Impact

Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact
V. CULTURAL RESOURCES. Would the project:	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	No Impact
VII. GEOLOGY AND SOILS. Would the project:	
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No Impact
ii) Strong seismic ground shaking?	Less than Significant Impact
iii) Seismic-related ground failure, including liquefaction?	No Impact
iv) Landslides?	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:	
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact

Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	
i) result in a substantial erosion or siltation on- or off-site;	Less than Significant Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less than Significant Impact
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than Significant Impact
iv) impede or redirect flood flows?	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant Impact
XI. LAND USE AND PLANNING. Would the project:	
a) Physically divide an established community?	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact
XII. MINERAL RESOURCES. Would the project:	
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact
XIII. NOISE. Would the project result in:	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact
XIV. POPULATION AND HOUSING. Would the project:	
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact
XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	
a) Fire protection?	No Impact
b) Police protection?	No Impact

Table 5-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
c) Schools?	No Impact
d) Parks?	No Impact
e) Other public facilities?	No Impact
XVI. RECREATION.	
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact
XVII. TRANSPORTATION. Would the project:	
d) Result in inadequate emergency access?	Less than Significant Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant Impact
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No Impact

6.0 ALTERNATIVES TO THE PROJECT

6.1 INTRODUCTION

An Environmental Impact Report (EIR) must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives". This section identifies potential alternatives to the Project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b] – 15126.6[f]) are provided below to explain the foundation and requirements for the alternatives analysis in the EIR.

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly (Section 15126.6[b]).
- The specific alternative of 'no project' shall also be evaluated along with its impact (Section 15126.6[e][1]).
- The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (Section 15126.6[f]).

- For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (Section 15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (Section 15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6[f][3]).

6.1.1 PROJECT OBJECTIVES

As stated in Section 3.0 of this EIR, and pursuant to Section 15124 of the State CEQA Guidelines, the objectives that have been established for the Project are listed below.

- Objective 1: Create a professional, well-maintained and attractive environment for the development of a warehouse building consistent with the underlying zoning adjacent to nearby transportation infrastructure such as the I-710 and I-5 Freeways.
- Objective 2: Provide the entitlements and framework for redevelopment of the site with a Class "A" warehouse and office building that is responsive to local and regional trade demands.
- Objective 3: Provide development that will enhance the City's economic well-being and employment opportunities for community residents.
- Objective 4: Facilitate a project that provides goods to the regional economy.

6.1.2 SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis in Sections 4.1 through 4.9 of this EIR concludes that implementation of the Project would result in no impact; a less than significant impact; or a less than significant impact with incorporation of applicable mitigation measures for each of the thresholds evaluated in this EIR. No significant and unavoidable impacts would result.

Although the Project would not result in any significant and unavoidable impacts, Project-level mitigation measures are required to reduce potentially significant construction-related impacts to levels considered less than significant for: Cultural Resources (due to the potential to encounter buried cultural resources), Geology and Soils (due to the potential to encounter buried paleontological resources), Hazards and Hazardous Materials (due to the potential to encounter contaminated soils), and Tribal Cultural Resources (due to the potential to encounter buried tribal cultural resources). These potentially significant impacts are associated with construction activities, not operation of the Project.

6.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED ANALYSIS

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should 1) identify alternatives that were considered by the Lead Agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process, and 2) briefly explain the reasons underlying the Lead Agency's determination. Section 15126.6(c) of the CEQA Guidelines states, "[a]mong the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but not selected for detailed analysis in this EIR. As described in greater detail below, the main reason for rejecting these alternatives was that they would not avoid or substantially reduce the impacts associated with the Project and/or would not be consistent with the Project objectives.

6.2.1 ALTERNATIVE SITE

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by developing the project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][B]).

To meet the Project objectives and implement 7400 Slauson Avenue Project, the Alternative Site for consideration in this analysis could include other parcels within the Commerce Park Planning Area or in other Industrial land use areas where the City of Commerce anticipates future industrial development. For this alternative, any development within these areas would need to be consistent with the Project, the Project objectives, and development anticipated in the area, as presented in City of Commerce General Plan and zoning. It should be noted that the Commerce Park Planning Area encompasses the southern half of the City, south of Sheila Street and exclusive of the Southeast Planning Area. The City's General Plan Section 3.5.4.6 for this area encourages the continued presence of all types of industry throughout the planning area (City of Commerce, 2008, p. 48)

Under existing conditions, the entire Commerce Park Planning Area is heavily developed. Other parcels are developed with industrial, commercial, transport, or public facility uses. Implementing the Project on a different parcel would require acquisition of developed property, demolition of existing operational structures, and discontinuing existing land uses, which is likely to disrupt existing businesses and operations, and would result in environmental impacts similar to those identified for the Project. As identified in the analysis presented in Sections 4.1 through 4.9 of this EIR, all potentially significant impacts are related to the inadvertent discovery of cultural, paleontological, and tribal cultural resources during grading activities and potential soil contamination. Potential soil contamination is site-specific and may or may not occur on alternative sites. These potential impacts

would continue to occur for any redevelopment or development within the City limits. Development at an Alternative Site would only move Project impacts to a different location.

The Project-related truck and vehicular trips and the associated air pollutant emissions, off-site traffic-related noise, and GHG emissions, which would be less than significant with the Project, would also occur with development at an Alternative site. Further, the proposed Project is anticipated to result in a net decrease of 42 trip ends per day as compared to the existing use. An Alternative Site would have the potential to result in a greater impact if the alternative site generated trips less than the existing conditions of the Project site (346 daily trips).

Last, the Project Applicant does not own other property in the Commerce Park Planning Area or any other location in the City that could accommodate the Project, other than the Project site. It would not be feasible for the owner to control or otherwise have access to another site of a similar size to the Project site. CEQA does not require the consideration of infeasible sites that are not owned by the landowner or that could not be reasonably acquired by the landowner to be analyzed as alternatives to the Project (State CEQA Guidelines, Section 15126.6[f][1]).

6.2.2 Alternative Development Project On-Site

It is typical to consider alternative development scenarios for a Project (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) when identifying potential alternatives to avoid or reduce potential significant impacts resulting from construction or operation of a project to a less than significant level. As previously identified, and as demonstrated through the analysis presented in Section 4.1 through Section 4.9 of this EIR, the Project would not result in any significant and unavoidable impacts, and the Project's potential impacts are less than significant with incorporation of applicable mitigation measures from Project-level mitigation measures.

Implementation of an alternative development scenario that could potentially meet the Project objectives would also require the removal of the existing buildings, site preparation, grading/excavation, and building construction. All Project impacts that require Project-level mitigation are associated with construction activities, not operation, and would therefore also occur under an alternative development scenario onsite. For that reason, there is no need to further evaluate alternative development scenarios

6.3 Alternatives Analysis

When considering potential alternatives to the Project, the City focused on alternatives that would avoid or reduce the potentially significant impacts. As discussed previously, because the Project's potentially significant impacts, prior to mitigation, are related to construction, the only type of development that would avoid these impacts would involve retention and reuse of the existing buildings and facilities. As described below, this also would fulfill the CEQA requirements for evaluating a "no project alternative."

For the alternative evaluated below, it is assumed that relevant regulatory requirements and Project-specific mitigation measures would also be implemented and thus serve to reduce or avoid potential significant impacts similar to the Project.

6.3.1 NO PROJECT ALTERNATIVE – REUSE OF EXISTING BUILDINGS

Section 15126.6(e) of the State CEQA Guidelines requires than an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternatives: (1) when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed.

The Project is consistent with City of Commerce General Plan land use type and zoning for the Project site and a General Plan Amendment or Change of Zone is not needed. Similarly, the Project does not conflict with the land uses allowed by the existing zoning for the site. Thus, the Project represents development that would be allowed under current City regulations.

A. Description of Alternative

The No Project Alternative – Use of Existing Buildings (No Project Alternative) addressed in this section represents both types of no project alternatives outlined in the CEQA Guidelines: (1) continuation of development consistent with the existing community development type and zoning designations, and (2) assumes the Project does not proceed (leaving the existing buildings on-site). A No Project Alternative that would involve retention of the existing buildings but no associated operations is not being considered, because such an alternative would not meet the Project objectives.

Under this alternative, the existing buildings and associated facilities on-site would be retained and reoccupied for use consistent with that allowed by right pursuant to Section 19.11, Manufacturing Zones, of the City's Municipal Code. This includes, but is not limited to, ongoing industrial and office uses. Under existing conditions, the Project site is currently developed with 249,579 square feet (sf) of existing structures, associated on-site landscaping and parking. Existing structures include one primary 233,260 sf warehouse and office building, and five ancillary structures which range from 694 sf to 6,750 sf. The existing on site facility operates as a warehouse and office building for Gehr Industries.

B. Comparative Analysis of Environmental Impacts

The focus of this analysis is to determine if the No Project Alternative is capable of eliminating or reducing the potentially significant environmental effects of the Project. With respect to archaeological, paleontological, and tribal cultural resources, the No Project Alternative would not involve any excavation or grading activities. Therefore, the potential to discover previously unidentified archaeological, paleontological, and tribal cultural resources is eliminated. As such, the

potential for impacts to archaeological, paleontological, and tribal cultural resources with the No Project Alternative would be less than with the Project.

The EIR determined that there is a potential for the discovery of contamination during grading activities due to past reported evidence of soil and groundwater contamination resulting from to the presence of Volatile Organic Compounds (VOCs) and historical uses. This potential impact would be addressed with implementation of the Soil Management Plan (SMP). Since no grading would occur under the No Project alternative, there would not be the potential for discovery of soil contamination and any potential contamination would remain in place. Without implementation of the SMP, impacts would be greater under the No Project alternative compared to the Project.

The Project would not result in any significant impacts before mitigation for any other topical issues and therefore do not need to be assessed under the No Project Alternative.

C. Attainment of Project Objectives

The discussion below addresses the ability of the No Project Alternative to attain the Project objectives.

A. **Create a professional, well-maintained and attractive environment for the development of a warehouse building consistent with the underlying zoning adjacent to nearby transportation infrastructure such as the SR-710 and I-5 Freeways.** The No Project Alternative would not involve the redevelopment of the Project site, rather it would involve the continued use or reuse of existing buildings and facilities at the Project site for warehouse/office use. Therefore, the No Project Alternative does meet the overall intent of this Project objective to create a professional and well-maintained warehouse building and redevelopment of the Project site is necessary to accomplish this objective.

B. **Provide the entitlements and framework for redevelopment of the site with a Class "A" warehouse and office building that is responsive to local and regional trade demands.** The No Project Alternative would not include entitlements for redevelopment with a Class "A" building responsive to local, national, and international trade demands. Therefore, the No Project Alternative does not meet the overall intent of this Project objective and redevelopment of the Project site is necessary to accomplish this objective.

C. **Provide development that will enhance the City's economic well-being and employment opportunities for community residents.** While the No Project Alternative would continue to generate revenue, the Project site is currently underutilized. The proposed redevelopment of the Project with a contemporary warehouse building would provide increased employment opportunities and generate additional property tax value for the City. Additionally, the new warehouse building could also attract users that generate sales tax revenue. Therefore, the No Project Alternative would not meet this objective and redevelopment of the Project site is necessary to accomplish this objective.

D. **Facilitate a project that provides goods to the regional economy.** The No Project Alternative would not involve the redevelopment of the Project site, rather it would involve the continued use or reuse of the existing building and facilities at the Project site for continued warehouse/office use. Reuse of the existing buildings have the potential to provide goods to the regional economy. However, the availability of potential tenants would be limited since redevelopment of the site with new modern Class A buildings would not occur. Therefore, the No Project Alternative would only partially meet this Project objective.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. As discussed above, the No Project Alternative, would not require construction and would not cause construction-related impacts. However, Section 15126.6(e)(2) of the CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the analysis presented in Section 4.1 through 4.9 of this EIR, compliance with applicable regulations and implementation of Project-level mitigation measures (for potential impacts related to archaeological, paleontological, and tribal cultural resources), the Project would not result in any significant and unavoidable impacts. Therefore, for the reasons outlined in Section 6.2.2, above, there is no need to further evaluate alternative development scenarios (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) compared to the Project. Any alternative development scenario would have similar impacts as the Project related to construction activities, and the Project would not result in any significant operational impacts that would be avoided by an alternative.

Therefore, there are no other alternatives evaluated in this EIR that would be considered environmentally superior to the Project.

7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 CITY OF COMMERCE

City of Commerce, Planning Division
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7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the 7400 Slauson Avenue Project EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the City of Commerce, Economic Development and Planning Department, 2535 Commerce Way, Commerce, California 90040.

Appendix A: Initial Study for 7400 Slauson Avenue Project EIR, Notice of Preparation (NOP), and Written Comments on the NOP.

Appendix B1: Urban Crossroads, 2023a. *7400 Slauson Avenue Air Quality Impact Analysis*. Dated February 22, 2023.

Appendix B2: Urban Crossroads, 2023b. *7400 Slauson Avenue Mobile Source Health Risk Assessment*. Dated February 22, 2023.

Appendix C: Brian F. Smith and Associates, 2023a. *Cultural Resources Study for the 7400 East Slauson Avenue Project*. Dated February 16, 2023.

Appendix D: Urban Crossroads, 2023c. *7400 Slauson Avenue Energy Analysis.* Dated February 22, 2023.

Appendix E1: Southern California Geotechnical, 2020. *Geotechnical Investigation Proposed Warehouse 7400 Slauson Avenue Commerce, California for Duke Realty*. Dated November 25, 2020.

Appendix E2: Brian F. Smith and Associates, 2023b. *Paleontological Assessment for the 7400 East Slauson Avenue Project*. Dated February 17, 2023.

Appendix F: Urban Crossroads, 2023d. *7400 Slauson Avenue Greenhouse Gas Analysis*. Dated February 22, 2023.

Appendix G1: Apex Companies, LLC, 2020. *Phase I Environmental Site Assessment 7400 East Slauson Avenue*. Dated November 24, 2020.

Appendix G2: Ardent Environmental Group, Inc, 2017. *Soil Management Plan*. Dated April 3, 2017.

Appendix H: Urban Crossroads, 2023e. *7400 Slauson Avenue Noise and Vibration Analysis*. Dated January 26, 2023.

Appendix I1: Urban Crossroads, 2023f. *7400 Slauson Avenue Focused Traffic Assessment*. Dated January 4, 2023.

Appendix I2: Urban Crossroads, 2023g. *7400 Slauson Avenue Vehicle Miles Travelled (VMT) Screening Evaluation*. Dated January 5, 2023.

7.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and

supporting documentation is a matter of public record and is available to the public at the location listed below.

Cited As:	***Citation:***
City of Commerce, 2008	City of Commerce, 2008. *City of Commerce 2020 General Plan. January 2008.* Available for review at: https://www.ci.commerce.ca.us/DocumentCenter/Home/View/152
City of Commerce, 2021	City of Commerce, 2019. *City of Commerce Municipal Code. April 21, 2021.* Available for review at: https://library.municode.com/ca/commerce/codes/code_of_ordinances
Duke Realty, 2021	Duke Realty. 2021. *Project Application Materials.* Available for review at the City of Commerce Economic Development and Planning: Available for review at 2535 Commerce Way, CA 90040.

7.4 DOCUMENTS AND WEBSITES CONSULTED

Cited As:	***Citation:***
AEP, 2021	Association of Environmental Professionals, *2021 California Environmental Quality Act Statute & Guidelines.* Available for review at: https://www.califaep.org/docs/CEQA_Handbook_2021.pdf
ASTM, 2013	American Society of Testing and Materials, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* Available for review at: https://www.astm.org/Standards/E1527.htm
BAAQMD, n.d.	Bay Area Air Quality Management District, *2017 Clean Air Plan*. Available for review at: https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans
CAAQS, 2016	Air Resources Board, *Ambient Air Quality Standards*. Available for review at: https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf
CalGreen, 2019	California Green Building Standards Code, *Appendix A5 – Nonresidential voluntary measures*. Available for review at: https://codes.iccsafe.org/content/CAGBSC2019/appendix-a5-nonresidential-voluntary-measures
CAPCOA, 2016	California Air Pollution Officers Association, *California Emissions Estimator Model.* Available for review at: http://www.caleemod.com/

Cited As:	***Citation:***
CDC, 2019	Center for Disaster Control, *Earthquake Zones of Required Investigation*. Available for review at: https://maps.conservation.ca.gov/cgs/EQZApp/app/
CPEP, *2017*	California Department of Conservation, *2017 White Paper*. Available for review at: https://www.sce.com/about-us/reliability/meeting-demand/pathwayto2030#:~:text=The%20Clean%20Power%20and%20Electrification%20Pathway%20presents%20Southern%20California%20Edison's,health%20related%20to%20air%20quality.
CRHR, 1992	California Register of Historical Resources, *Assembly Bill 2881*. Available for review at: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB2881
EMFAC, 2017	California Department of Transportation, *EMFAC Software*. Available for review online at: https://dot.ca.gov/programs/environmental-analysis
EPA, 2009	Environmental Protection Agency, *Final Mandatory Reporting of GHGs Rule*. Available for review at: https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-mandatory-reporting-greenhouse-gases#:~:text=EPA%20is%20promulgating%20a%20regulation,and%20offroad%20vehicles%20and%20engines.
EPA, 2016a	Environmental Protection Agency, *Operational Safety and Health Act Summary, October 4, 2016*. Available for review at: https://www.epa.gov/laws-regulations/summary-occupational-safety-and-health-act
EPA, 2016b	Environmental Protection Agency, *Resource Conservation and Recovery Act Summary, December 1, 2016*. Available for review at: https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act
EPA, 2016c	Environmental Protection Agency, *Toxic Substances Control Act Summary, December 14, 2016.* Available for review at: https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act
EPA, 2016d	Environmental Protection Agency, *Comprehensive Environmental Response Compensation and Liability Act Summary, February 7, 2016.* Available for review at: https://www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act

Cited As:	***Citation:***
EPA, 2019	Environmental Protection Agency, *Noise Control Act*, available for review at: https://www.epa.gov/laws-regulations/summary-noise-control-act
FHWA, 2017	Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement Policy and Guidance. August 24, 2017*. Available for review at: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide03.cfm
FTA, 2018	Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual, September 2018.* Available for review at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf
LACALUC, n.d	Los Angeles County Airport Land Use Commission, *Airport Land Use Commission Interactive Map.* Available for review at: http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a
LACMTA, 2010	Los Angeles County Metropolitan Transportation Authority, *2010 Congestion Management Program.* Available for review at: http://media.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf
NAAQS, 1990	National Ambient Air Quality Standards, *NAAQS* Table, available for review at: https://www.epa.gov/criteria-air-pollutants/naaqs-table
OPR, 2018	Office of Planning and Research, *Tribal Cultural Resources (Assembly Bill 52)*. Available for review at: https://opr.ca.gov/ceqa/updates/ab-52/
OSHA, 2002	Operation Safety and Health Act, *Construction-Related Hearing Conservation, August 5, 2002.* Available for review at: https://www.osha.gov/laws-regs/federalregister/2002-08-05
OSHA, n.d	Operational Safety and Health Act, *Transporting Hazardous Materials*. Available for review at: https://www.osha.gov/SLTC/trucking_industry/transportinghazardousmaterials.html
SCAQMD, 2003	South Coast Air Quality Management District, *2003 Air Quality Management Plan*. Available for review at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp

Cited As:	***Citation:***
SCAQMD, 2016	South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*. Available for review at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=11
SoCalGas, 2013	Southern California Gas Company, *List of Cities and Communities Served*. Available for review at: https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/CITIES.pdf
SoCalGas, 2018	Southern California Gas Company, *2018 Corporate Sustainability Report.* Available for review at: https://www.socalgas.com/1443742292537/2018_SCG_DBE-Report_2018.pdf
SoCalGas, 2018	Southern California Gas Company, *2018 California Gas Report.* Available for review at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf
TEA-21, 1998	Intermodal Surface Transportation Efficiency Act of 1991, *Transportation Equity Act for the 21st Century*. Available for review at: https://www.fhwa.dot.gov/tea21/
UNFCCC, 1997	United Framework Convention on Climate Change, *The Kyoto Protocol*. Available for review at: https://unfccc.int/kyoto_protocol

7.5 PERSONS CONSULTED/WRITTEN OR VERBAL COMMUNICATION

7.5.1 TRIBAL CONSULTATION

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