# U-HAUL REDEVELOPMENT PROJECT

## PUBLIC REVIEW DRAFT
## INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
APRIL 2022

*Prepared for:*

City of Gardena
Community Development Department
Development Services
1700 West 162nd Street
Gardena, CA 90247

*Prepared by:*

De Novo Planning Group
180 E. Main Street, Suite 108
Tustin, CA 92780

De Novo Planning Group

A Land Use Planning, Design, and Environmental Firm

# U-HAUL REDEVELOPMENT PROJECT

Public Review Draft

Initial Study/Mitigated Negative Declaration

**LEAD AGENCY: CITY OF GARDENA**
1700 West 162nd Street
Gardena, California 90247
Contact: Amanda Acuna, Senior Planner
aacuna@cityofgardena.org
(310) 217-9524

**PREPARED BY: DE NOVO PLANNING GROUP**
180 E. Main Street, Suite 108
Tustin, California 92780
Contact: Starla Barker, AICP
sbarker@denovoplanning.com
(949) 396-8193

April 2022

# Table of Contents

## Appendices

## List of Exhibits



## List of Tables

# 1.0 INTRODUCTION

## 1.1 Statutory Authority and Requirements

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Sections 21000, et seq.) and the State CEQA Guidelines (14 California Code of Regulations Title 14 Sections 15000, et seq.). This Initial Study is an informational document intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project.

Pursuant to CEQA Guidelines Section 15063, the City, as Lead Agency, has prepared this Initial Study to determine if the proposed U-Haul Redevelopment Project (Project) would have a significant effect on the environment. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that mitigation cannot reduce the impact to a less than significant level for any aspect of the proposed Project, then the Lead Agency must prepare an Environmental Impact Report (EIR) to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the Project as proposed may cause a significant effect on the environment, the Lead Agency may prepare a Negative Declaration (ND). If the Lead Agency finds that there is evidence of a significant impact, but the impact can be reduced through mitigation, the Lead Agency may prepare a Mitigated Negative Declaration (MND). Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such significant environmental impacts may occur (PRC Section 21080(c)).

Pursuant to CEQA Guidelines Section 15063(c), the purposes of an Initial Study are to:

1. Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR, MND or a ND;
2. Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND;
3. Assist in the preparation of an EIR, if one is required, by;
    a. Focusing the EIR on the effects determined to be significant,
    b. Identifying the effects determined not to be significant,
    c. Explaining the reasons for determining that potentially significant effects would not be significant, and
    d. Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environment effects.
4. Facilitate environmental assessment early in the design of a project;
5. Provide documentation of the factual basis for the finding in a MND or ND that a project will not have a significant effect on the environment;
6. Eliminate unnecessary EIRs; and
7. Determine whether a previously prepared EIR could be used with the project.

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the proposed Project. The resulting environmental documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

## 1.2 Summary of Findings

Pursuant to State CEQA Guidelines Section 15367, the City of Gardena (City), as the Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. As set forth in State CEQA Guidelines Section 15070, an Initial Study leading to a Negative Declaration (IS/ND) or Mitigated Negative Declaration (IS/MND) can be prepared when:

- The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment (resulting in a Negative Declaration), or

- The Initial Study identifies potentially significant effects, but:
    - Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
    - There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment (resulting in a Mitigated Negative Declaration).

Based on the Environmental Checklist Form and supporting environmental analysis provided in Section 4.0, Environmental Analysis, the proposed Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Biological Resources;
- Cultural Resources;
- Geology and Soils; and
- Tribal Cultural Resources.

## 1.3 Public Review Process

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible agencies and trustee agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 20-day public review period has been established for the IS/MND in accordance with State CEQA Guidelines Section 15073. During the public review period, the IS/MND, including the technical appendices, was made available for review at the following locations:

- City of Gardena Website: https://www.cityofgardena.org/community-development/planning-projects/
- City of Gardena City Hall, Receptionist – 1700 West 162nd Street, Gardena
- Gardena Mayme Dear Library – 1731 West Gardena Boulevard, Gardena

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the Project's potentially significant effects can be avoided or mitigated.

Written comments on this IS/MND may be sent to:

Amanda Acuna, Senior Planner
City of Gardena, Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3730
Email: aacuna@cityofgardena.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised, and if further documentation may be required. If no new environmental issued have been raised or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

## 1.4 Incorporation by Reference

Pursuant to State CEQA Guidelines Section 15150, a MND may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the MND's text.

The references outlined below were utilized during preparation of this Initial Study. Copies of these documents are available for review on the City's website (http://www.cityofgardena.org/) unless otherwise noted.

*City of Gardena General Plan 2006*, adopted April 25, 2006. The City adopted the comprehensive *Gardena General Plan 2006* (General Plan) in 2006. Subsequently, the Community Development Element's Land Use Plan was updated in June 2012 and February 2013, and the Circulation Plan was updated in July 2020. The 2021-2029 Housing Element was adopted in January 2022. In February 2022, the Safety Element was updated and a new Environmental Justice Element was adopted. The Gardena General Plan is comprised of the following Elements and Plans:

- Community Development Element
  - Land Use Plan
  - Economic Development Plan

  - Community Design Plan
  - Circulation Plan
- Housing Element
- Community Resources Element
  - Open Space Plan
  - Conservation Plan
- Community Safety Element
  - Public Safety Plan
  - Noise Plan
- Environmental Justice Element
- Implementation
  - Implementation Program

The General Plan constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The General Plan is based upon the following core visions for the City: City of Opportunity; Safe and attractive place to live, work and play; Community that values ethnic and cultural diversity; Strong and diverse economic base. It evaluates the existing conditions and provides long-term goals and policies necessary to guide growth and development in the direction that the community desires. Through its Goals, Objectives, Policies, and Programs, the General Plan serves as a decision-making tool to guide future growth and development decisions.

*City of Gardena General Plan 2006 Final Environmental Impact Report,* SCH No. 2005021125, April 2006. The *City of Gardena General Plan 2006 Final Environmental Impact Report* (General Plan FEIR) analyzed the potential environmental impacts that would result from implementation of the Gardena General Plan. The General Plan FEIR forecast 22,329 dwelling units, approximately 18.9 million square feet of nonresidential land uses and a resulting population of 63,799 persons at the City's buildout. Buildout was estimated to occur over 20 years. The General Plan FEIR concluded significant and unavoidable impacts concerning Transportation and Traffic.

*Gardena Municipal Code*. The Gardena Municipal Code regulates municipal affairs within the City's jurisdiction including, without limitation, zoning regulations (codified in Gardena Municipal Code Title 18). The Municipal Code is the primary method used for implementing the General Plan's Goals, Objectives, and Policies. Gardena Municipal Code Title 18, Gardena Zoning Law, specifies the rules and regulations for construction, alteration and building of structures within the City.

## 1.5 Report Organization

This document is organized into the following sections:

Section 1.0, Introduction, provides the CEQA Statute and Guidelines applicable to the Initial Study, summarizes the findings of the Initial Study, describes the public review process, and identifies documents incorporated by reference as part of the Initial Study.

Section 2.0, Project Description, provides a detailed description of the proposed Project, including Project location, environmental setting, Project characteristics, construction program and phasing, and requested entitlement, permits and approvals.

Section 3.0, Environmental Checklist Form, provides Project background information and a summary of environmental factors potentially affected by the proposed Project and the Lead Agency Determination based on the analysis and impact determinations provided in Section 4.0. The impact evaluation criteria utilized in Section 4.0 is also provided.

Section 4.0, Environmental Analysis, provides a detailed analysis of the environmental impacts identified in the environmental checklist, and identifies mitigation measures, if necessary.

Section 5.0, References, identifies the information sources utilized in preparation of the IS to support the environmental analysis.

This page intentionally left blank.

# 2.0 PROJECT DESCRIPTION

## 2.1 Project Location

The U-Haul Redevelopment Project (Project) site is located in the City of Gardena within the County of Los Angeles; refer to Exhibit 2-1, *Regional Vicinity*. The Project site is comprised of approximately 4.2-acres located at 14206 S. Van Ness Avenue (APNs 4061-028-023, -033, and-051); refer to Exhibit 2-2, *Project Location*.

Regional access to the site is provided via the Harbor Freeway (Interstate [I] 110) to the east, the Artesia Freeway (SR-91) to the south, and the Glen Anderson Freeway (I-105) to the north of the site. Local access to the site is provided directly from Van Ness Avenue and Rosecrans Avenue. Within the Project area, Van Ness Avenue is accessible from West 135th Street to the north and Rosecrans Avenue to the South. Rosecrans Avenue is accessible from Van Ness Avenue to the west and Western Avenue to the east.

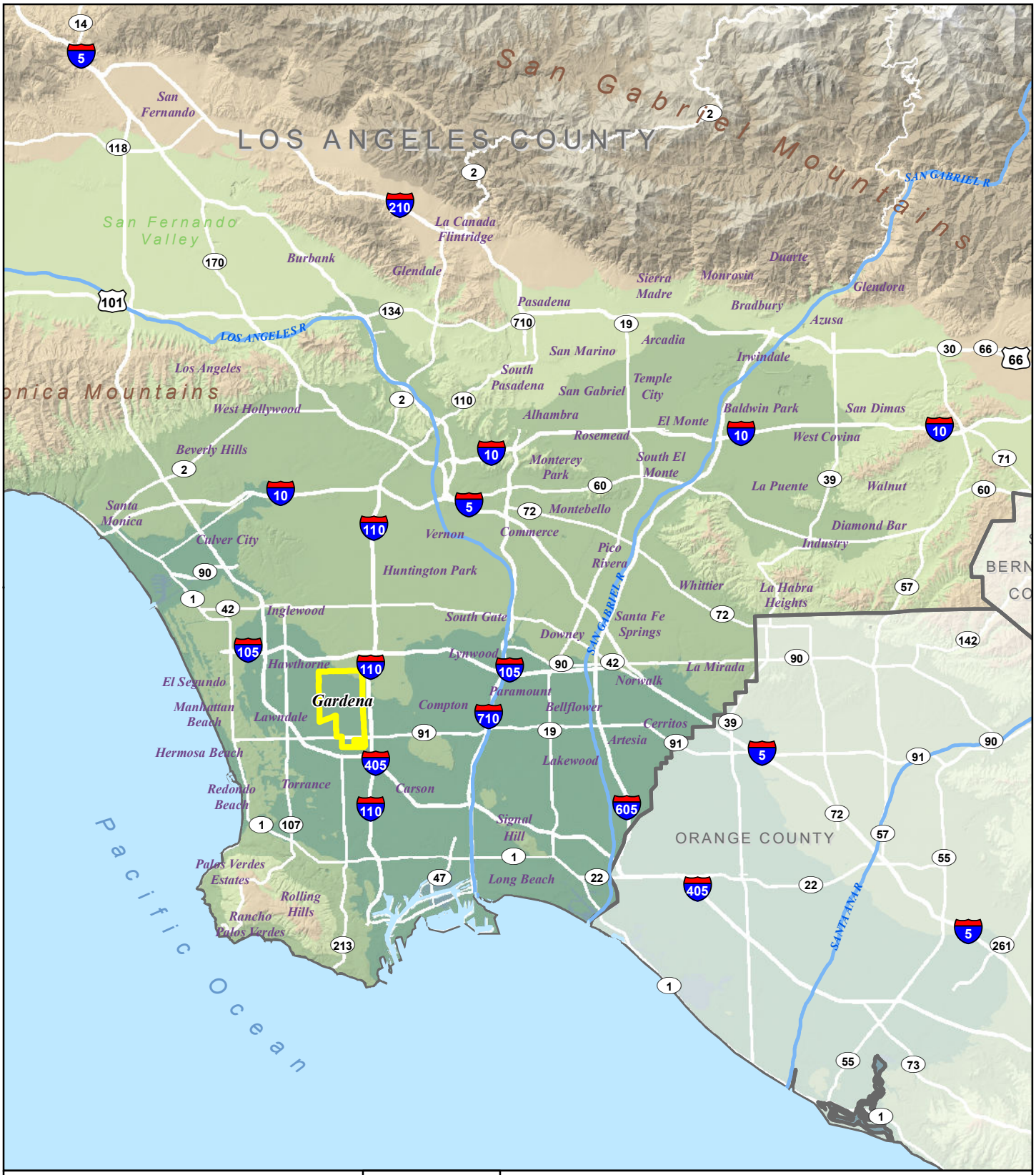
## 2.2 Existing Setting

### ON-SITE LAND USES

The Project site is a relatively flat primarily rectangular shaped property. The majority of the site is developed with an existing U-Haul self-storage facility; an unoccupied former restaurant building is located within the southern portion of the site adjacent to Rosecrans Avenue; refer to Table 2-1, *Existing On-Site Uses*. The U-Haul self-storage facility is currently in operation with eight corporate employees and eight to nine part-time employees. The northwestern corner of the Project site is separated by a fence and currently provides 10 parking spaces for use by patrons of the adjacent United States Post Office per a lease agreement. There is an existing propane tank and guardrail along the Van Ness Avenue frontage and two "U-Haul" marquee signs along each street frontage; refer to Exhibit 2-2. The southwestern corner is currently being leased to G3 Urban and contains a sales trailer to market and sell their new homes being constructed in the area. The sales trailer will be removed once the homes are sold or when U-Haul begins construction, whichever comes first.

**Table 2-1**
**Existing On-Site Uses**

| Land Use | Development[1] (Square Feet) |
|---|---|
| U-Haul (occupied) | |
| - Retail | 3,750 |
| - Storage | 23,536 |
| - Office | 15,981 |
| *U-Haul Subtotal* | 43,267 |
| Restaurant (unoccupied) | 3,771 |
| Total | 47,022 |
| Source: Doug Brumfield, 865 Marketing Company Presidential, U-Haul, June 21, 2021 | |
| 1. Building measurements are approximate. | |




**Legend**

- City of Gardena
- County Boundary

N

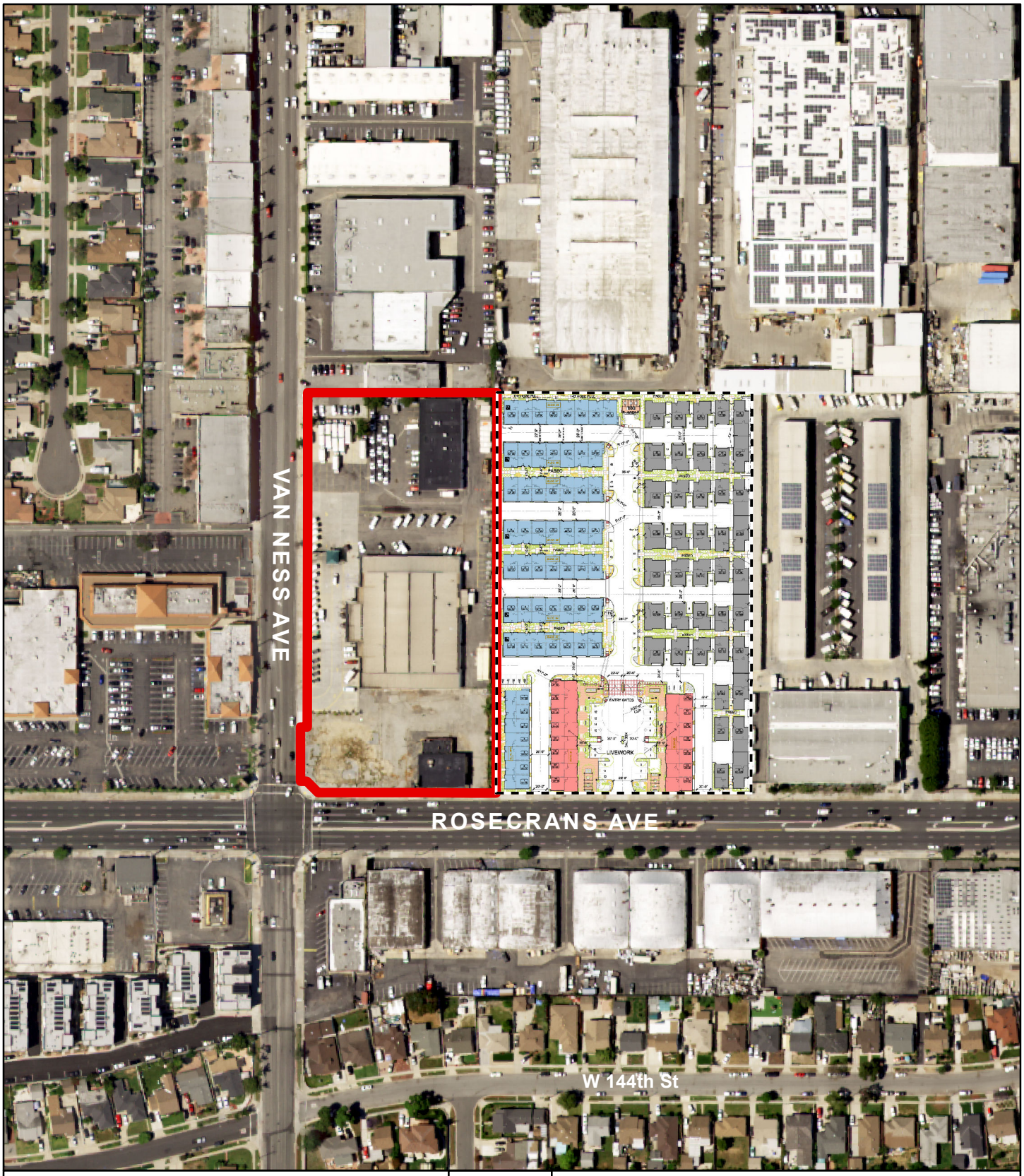
0 2½ 5
Miles

*Sources: CalAtlas; Los Angeles County. Map date: November 10, 2021.*

**CITY OF GARDENA**
**U-HAUL REDEVELOPMENT PROJECT**
**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

## Exhibit 2-1. Regional Vicinity

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm




**Legend**

Project Boundary

Rosecrans Place (Under Construction)

N

0 50 100

Feet

*Sources: Los Angeles County; USGS EROS-NAIP Imagery 5-5-2020; Angeleno Associates, Inc. Map date: November 10, 2021.*

**CITY OF GARDENA**
**U-HAUL REDEVELOPMENT PROJECT**
**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

## Exhibit 2-2. Project Location

De Novo Planning Group
A Land Use Planning, Design, and Environmental Firm

The entire site is paved with minimal landscaping located along the southernmost portion of the eastern property boundary and interspersed along the northern property boundary. As part of the residential development to the east, a block wall has been constructed along the eastern property line. A wrought iron fence is located along a portion of the northern property line, adjacent to the United States Post Office and separating the portion of the Project site currently used for parking by the post office.

Primary access to the Project site occurs via two driveways along Van Ness Avenue. A third driveway, located at the northwest portion of the Project site provides access to the parking spaces for use by post office patrons. Three driveways/curb cuts are located along Rosecrans Avenue.

## GENERAL PLAN AND ZONING

According to the City of Gardena Land Use Map (General Plan Land Use Element Figure LU-2), the Project site is designated General Commercial with a Mixed Use Overlay (MUO). The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. The maximum permitted floor area ratio (FAR) is 0.5 in general and up to 2.75 for specific uses when allowed by the Zoning Code. The MUO permits residential development on selected areas designated for Commercial and Industrial land uses. The purpose of this land use designation is to allow greater flexibility of development alternatives, especially attractive higher density residential development in appropriate areas that are experiencing both physical and economic blight.

The City of Gardena Zoning Map identifies the zoning for the Project site as General Commercial (C-3) with a MUO. Gardena Municipal Code, Chapter 18.32, *General Commercial Zone (C-3)*, states the C-3 zone is intended for general commercial uses and identifies the permitted uses and property development standards for properties within the C-3 zone. Gardena Municipal Code Chapter 18.19, *Mixed Use Overlay Zone (MUO)*, states the mixed use overlay zone is intended to allow greater flexibility of development alternatives, especially attractive higher density residential development and live-work buildings, in appropriate areas of the city. Except for amenity hotels, the allowed FAR in the C-3 zone is 0.5. Self-storage facilities are not allowed in the C-3 zone.

The City's Heavy Commercial Zone (C-4; Chapter 18.34) allows self-storage facilities with a conditional use permit provided that the self-storage units do not exceed more than seventy-five feet of ground floor street frontage on a major collector or arterial street or are otherwise buffered by an allowed use. The allowed FAR for self-storage facilities is 2.75.

Both the C-3 and C-4 zones are consistent with the General Commercial land use designation.

## SURROUNDING USES

Uses surrounding the Project site include:

- North: North of the Project site is the United States Post Office. Areas to the north are zoned General Industrial Zone (M-2).

- East: East of the Project site is Rosecrans Place, a mixed-use development with live-work and residential uses. Areas to the east are zoned C-3 with MUO.
- South: Rosecrans Avenue is located immediately south of the Project site. South of Rosecrans Avenue are a mix of commercial uses. Areas to the south are zoned C-3 with MUO.
- West: Van Ness Avenue is located immediately west of the Project site. West of Van Ness Avenue is a mix of commercial uses. Areas to the west are zoned C-2 and P (Parking) with MUO and C-3.

## 2.3 Project Characteristics

The Project Applicant requests approval of the proposed U-Haul Redevelopment Project. The Project includes a Zone Change (ZC) #1-21, Conditional Use Permit (CUP) #1-21, Site Plan Review (SPR) #3-21 and a Zone Text Amendment (ZTA) #2-21, as further described below.

### PROPOSED DEVELOPMENT

The Project proposes to remove the existing on-site structures and develop a new, modern U-Haul Moving and Storage facility. In addition to providing U-Haul truck and trailer sharing and retail sales, the location would house regional U-Haul marketing operations.

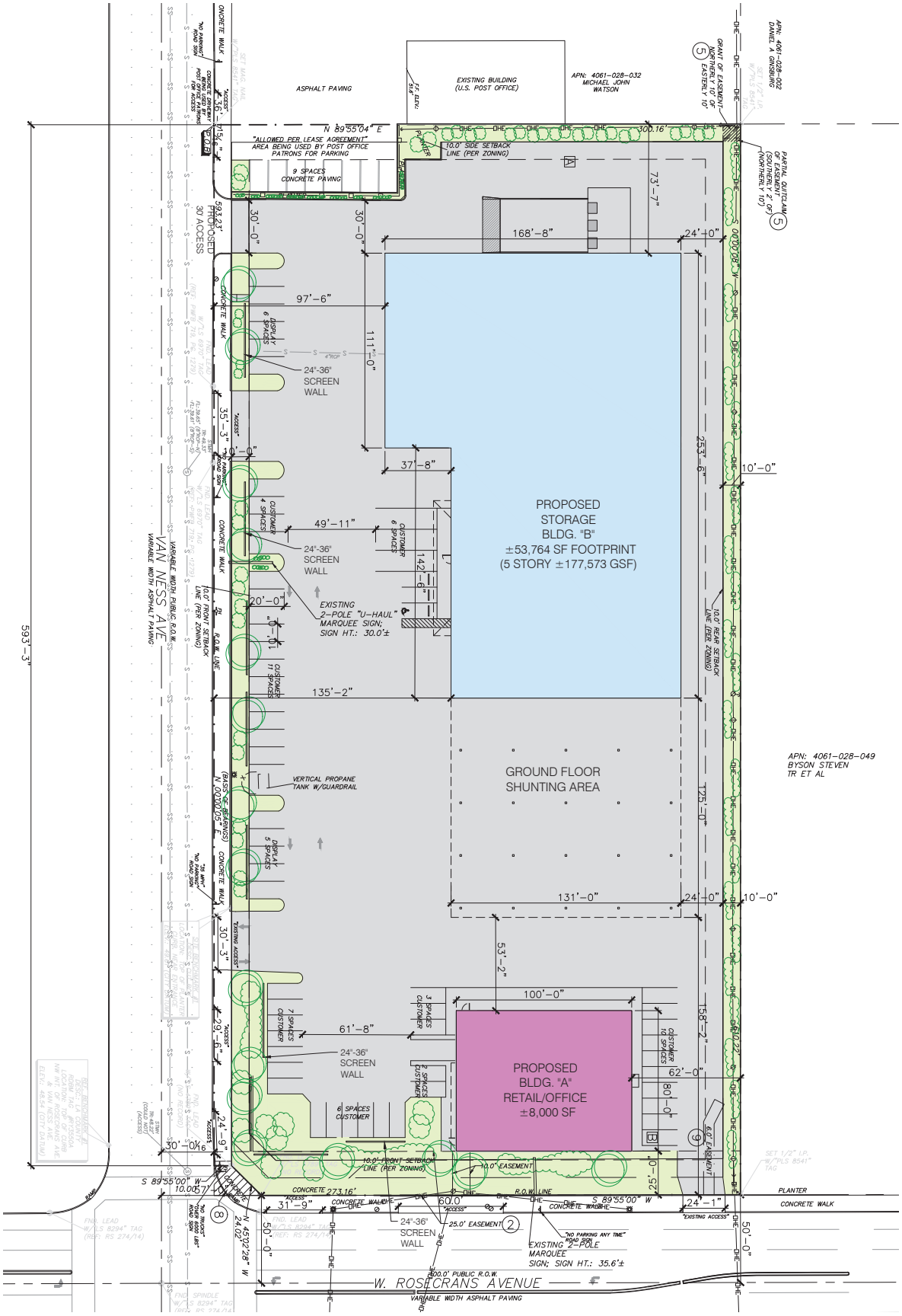
An approximately 177,573 gross square foot, five-story storage facility would be located within the northern portion of the site and a separate 8,000-square foot single-story building for retail sales and office use would be located within the southern portion of the site, adjacent to Rosecrans Avenue; refer to Exhibit 2-3, *Proposed Site Plan*. The proposed storage facility would provide a total of 1,620 storage units ranging in size from 5 feet by 5 feet to 10 feet by 20 feet distributed throughout the five levels and a covered truck shunting area on the ground floor; refer to Exhibit 2-4, *Proposed Floor Plan*. All storage units would have interior access. U-Haul storage customers would utilize a card-swipe style identification card to gain access to their storage facility. Additional security features would include day and night security cameras with 24-hour digital video surveillance with remote and web base viewing. The existing propane tank and guardrail and two “U-Haul” marquee signs would remain in their current locations.

#### *Operations*

The U-Haul Moving and Storage Store would continue to be open Monday through Thursday and Saturday from 7:00 am to 7:00 pm; Friday from 7:00 am to 8:00 pm; and Sunday from 9:00 am to 5:00 pm. The existing eight on-site corporate employees would be housed within the new retail sales and office building. The new U-Haul Moving and Storage Store would employ 10-15 part-time employees with alternating shifts.

#### *Landscaping and Walls*

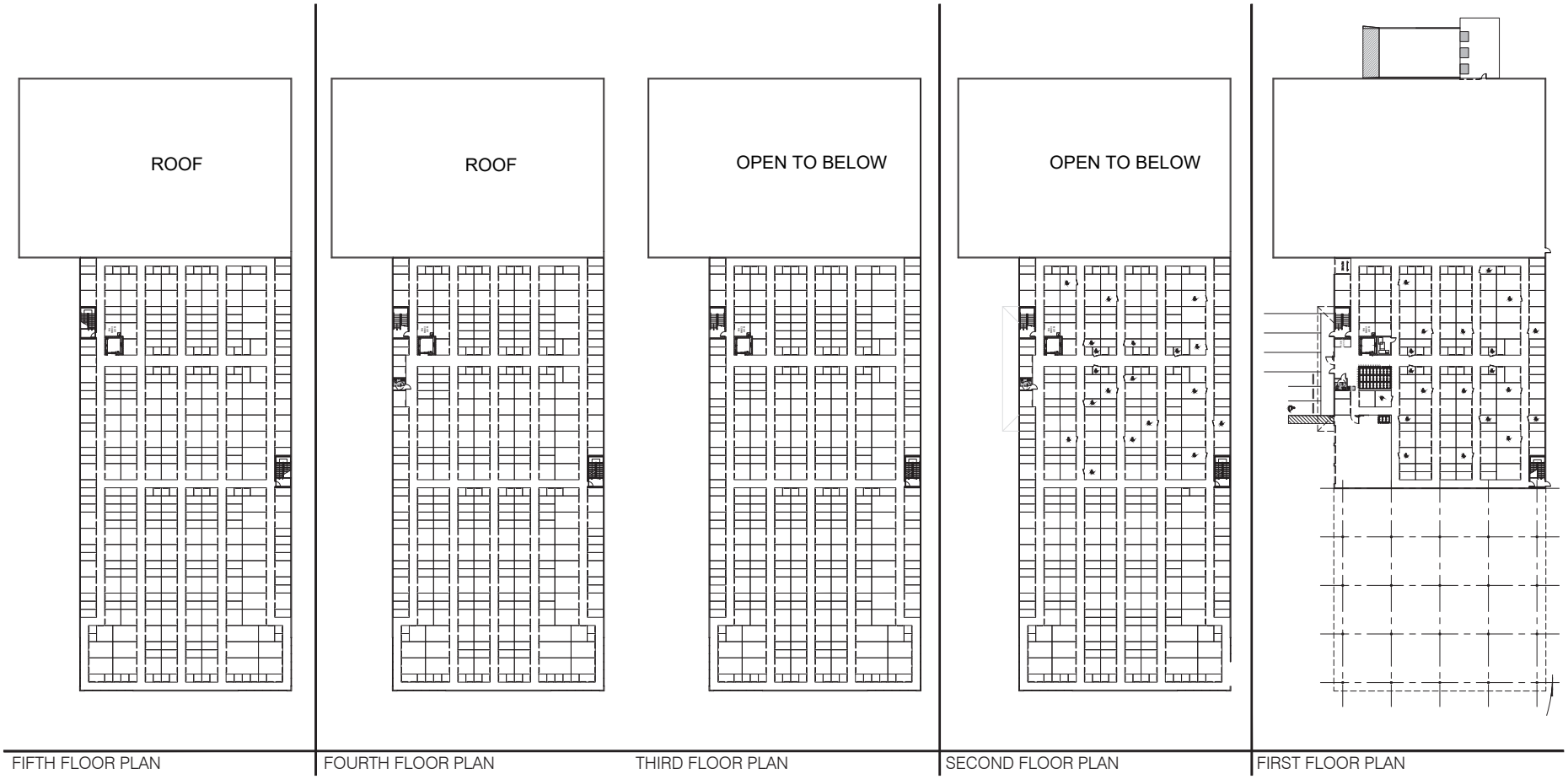
Landscaping would be provided around the perimeter of the Project site and separating the northwestern corner of the Project site, which would continue to be used for parking by post office patrons; refer to Exhibit 2-5, *Conceptual Landscape Plan*. The Project proposes 24- to 36-inch intermittent screen walls within the landscaped areas along Van Ness and Rosecrans Avenues.




**CITY OF GARDENA**
**U-HAUL REDEVELOPMENT PROJECT**
**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

# Exhibit 2-3. Proposed Site Plan

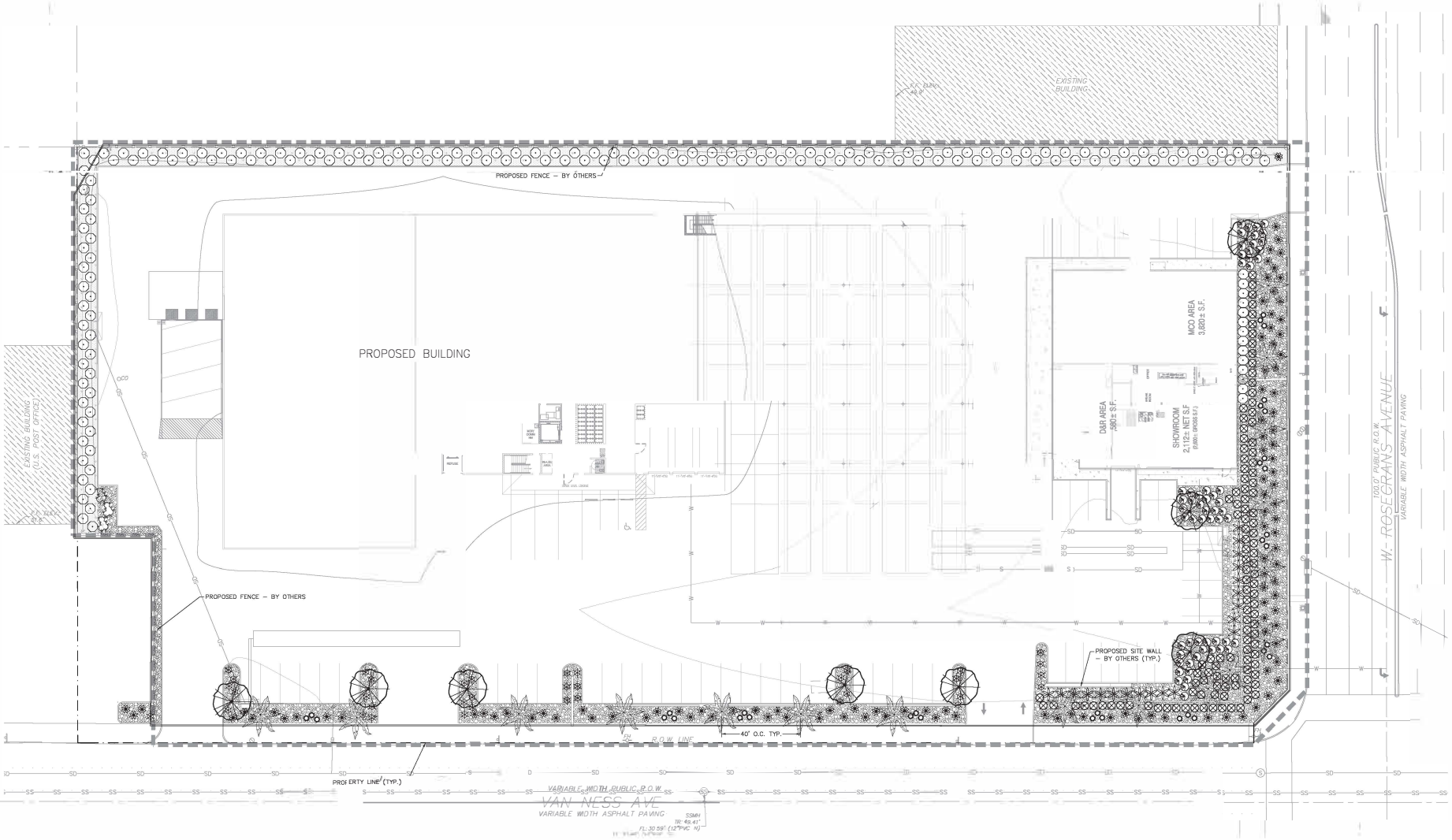
*Sources: Los Angeles County; Amerco Real Estate Co. 1-26-2021*
*Map date: November 10, 2021.*




**CITY OF GARDENA**
**U-HAUL REDEVELOPMENT PROJECT**
**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

Exhibit 2-4. Proposed Floor Plan

*Sources: Los Angeles County; Amerco Real Estate Co. 5-22-2019.*
*Map date: November 10, 2021.*




GROUND COVERS

Crushed Rock (9,852 sf)

Wood Bark Mulch (4,550 sf)

TREES

Indian Laurel Fig (Quantity 8)

PALMS

Queen Palm (Quantity 17)

SHRUBS

Foxtail Agave (Quantity 113)

Golden Barrel Cactus (Quantity 33)

Red Yucca (Quantity 37)

Pink Muhly Grass(Quantity 115)

Pine Muhly (Quantity 59)

Little Ollie Olive (Quantity 174)

New Zealand Flax (Quantity 20)

Elephant Bush (Quantity 3)

**CITY OF GARDENA**
**U-HAUL REDEVELOPMENT PROJECT**
**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

# Exhibit 2-5. Proposed Landscape Plan

*Sources: Los Angeles County; Kimley Horn 2-9-2022. Map date: April 14, 2022.*

### *Parking*

A total of 60 parking spaces would be distributed throughout the site, primarily adjacent to Van Ness Avenue, adjacent to the southern portion of the proposed storage facility, and east and west of the retail sales and office building. Of the 60 parking spaces, 49 spaces would be for customer and employee use and 11 spaces, adjacent to Van Ness Avenue, would be used for display of U-Haul trucks.

As noted, the northwest corner of the Project site would continue to be used for parking by post office patrons pursuant to a lease agreement. New landscaping adjacent to the parking area would involve the removal of one of the existing parking spaces.

### *Site Access*

Access to the Project site would continue to occur from the two existing driveways on Van Ness Avenue. An additional 30-foot-wide driveway is proposed within the northern portion of the site, south of the parking spaces used by the post office. The Project proposes to remove two of the driveways on Rosecrans Avenue and to reconstruct the curb/gutter and sidewalk; the existing driveway at the southeast corner of the Project site would be maintained; refer to Exhibit 2-2.

### *Architecture*

The proposed buildings would primarily incorporate architectural panels with complimentary colors including silver, greys, sand stone, and beige, with accent colors that reflect the U-Haul company logo. Metal awnings and aluminum framed tempered storefront glass would also be incorporated along the storefront of the retail sales and office building and at the corners of the storage facility. The storage facility building corner would serve a focal point with taller parapet heights.

## INFRASTRUCTURE AND PUBLIC SERVICES

### *Water*

Golden State Water Company (GSWC) provides water service to the site. The Project would connect to existing on-site water lines, which connect to existing GSWC water mains. New water lines would be installed onsite for fire water.

### *Wastewater*

The City of Gardena conveys wastewater to the County Sanitation Districts of Los Angeles County's regional system for treatment at this location. The Project would connect to existing on-site sewer, which connects to an existing sewer main.

### *Stormwater*

The Project would construct catch basins, concrete valley gutters, and an underground stormwater treatment and detention basin, which would connect to existing stormwater facilities adjacent to the Project site.

### REQUESTED ENTITLEMENTS

The Project requests approval of the following entitlements:

- Zone Text Amendment (ZTA) #2-21 to amend Gardena Municipal Code Section 18.34.030, to allow for greater ground floor street frontage when a proposed self-storage facility is set back at least 50 feet from the public right-of-way.

- Zone Change (ZC) #1-21 to change the zoning of the site from General Commercial (C-3) with a Mixed Use Overlay (MUO) to Heavy Commercial (C-4) with a MUO;

- Conditional Use Permit (CUP) #1-21 to allow for the self-storage facility within the C-4 Zone; and

- Site Plan Review (SPR) #3-21 to approve the proposed Site Plan.

### PROJECT CONSTRUCTION AND PHASING

Project construction is anticipated to occur over 18-20 months beginning in late 2022 and ending in mid to late 2024. Construction activities would include demolition, site preparation, grading, building construction, and paving, architectural coating, and landscaping.

## 2.4 Permits and Approvals

The City of Gardena, as the Lead Agency, has discretionary authority over the proposed Project. Other agencies in addition to the City of Gardena are expected to use this IS/MND in their decision-making process. To implement the proposed Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others in addition to the approval of the Mitigated Negative Declaration (EA) #5-21:

- Zone Text Amendment (ZTA) #2-21;
- Zone Change (ZC) #1-21;
- CUP #1-21;
- Site Plan Review (SPR) #3-21; and
- Los Angeles Regional Water Quality Control Board – National Pollutant Discharge Elimination System (NPDES) Compliance/Low Impact Development (LID) approvals.

# 3.0 ENVIRONMENTAL CHECKLIST FORM

## Background

| |
|---|
| **1. Project Title:** U-Haul Redevelopment Project |
| **2. Lead Agency Name and Address:**<br>City of Gardena<br>Community Development Department<br>1700 West 162nd Street<br>Gardena, California 90247 |
| **3. Contact Person and Address:**<br>Amanda Acuna<br>Senior Planner<br>City of Gardena, Community Development Department<br>1700 West 162nd Street<br>Gardena, California 90247<br>Email: aacuna@cityofgardena.org |
| **4. Project Location:** 14206 S. Van Ness Avenue Gardena, California |
| **5. Project Sponsor's Name and Address:**<br>Mr. Doug Brumfield<br>U-Haul of Los Angeles South<br>14202 Van Ness Avenue<br>Gardena, California 90249 |
| **6. General Plan Designation:** General Commercial with a Mixed Use Overlay (MUO) |
| **7. Zoning:** General Commercial (C-3) with a MUO |
| **8. Description of the Proposed Project:** See Section 2.3. |
| **9. Surrounding Land Uses and Setting:** See Section 2.2. |
| **10. Other public agencies whose approval is required:** Los Angeles County Sanitation District; Los Angeles County Regional Water Quality Control Board; Los Angeles County Fire Department. |
| **11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**<br><br>In compliance with AB 52, the City distributed letters to applicable Native American tribes informing them of the Project on August 30, 2021. Two California Native American tribes, the Gabrielino Tongva Tribe and the Gabrieleno Band of Mission Indians – Kizh Nation, have requested consultation; refer to Response 4.18. |

## Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant With Mitigation Incorporated" as indicated by the checklist on the following pages.

| | | | | | |
|---|---|---|---|---|---|
| | Aesthetics | | Agriculture and Forestry Resources | | Air Quality |
| X | Biological Resources | X | Cultural Resources | | Energy |
| X | Geology and Soils | | Greenhouse Gasses | | Hazards and Hazardous Materials |
| | Hydrology and Water Quality | | Land Use and Planning | | Mineral Resources |
| | Noise | | Population and Housing | | Public Services |
| | Recreation | | Transportation | X | Tribal Cultural Resources |
| | Utilities and Service Systems | | Wildfire | X | Mandatory Findings of Significance |

## Determination

On the basis of this initial evaluation:

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

CITY OF GARDENA

Greg S. Tsujiuchi
Community Development Director

4/25/22
Date

## Evaluation of Environmental Impacts

The environmental analysis in this section is patterned after CEQA Guidelines Appendix G. An explanation is provided for all responses with the exception of "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved, including on- and off-site project level and cumulative, indirect and direct, and short-term construction and long-term operational impacts. The evaluation of potential impacts also identifies the significance criteria or threshold, if any, used to evaluate each impact question. If applicable, mitigation measures are identified to avoid or reduce the impact to less than significant. There are four possible responses to each question:

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.

- Less than Significant With Mitigation Incorporated. This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.

- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the project.

This page intentionally left blank.

# 4.0 ENVRIONMENTAL ANALYSIS

## 4.1 Aesthetics

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

***a) Have a substantial adverse effect on a scenic vista?***

**No Impact.** The City of Gardena does not identify any scenic vistas or scenic resources within City boundaries. The Project site and surrounding area are relatively flat and due to the topography and intervening structures associated with urbanization of the area, there are no expansive views or scenic vistas. The Project would not have a substantial adverse effect on a scenic vista.

**Mitigation Measures:** No mitigation measures are required.

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

**No Impact.** The Project area is developed and does not contain any scenic resources. There are no State or County designated scenic highways within the Project vicinity.[1] Additionally, the Gardena General Plan and the Gardena Municipal Code do not identify any scenic highways within the City. The Project would not substantially damage scenic resources within a State scenic highway.

**Mitigation Measures:** No mitigation measures are required.

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

**Less Than Significant Impact.** The Project site is located within an urbanized area. The majority of the site is developed with an existing U-Haul self-storage facility and an unoccupied former restaurant building is located within the southern portion of the site adjacent to Rosecrans Avenue. The surrounding area is developed and comprised primarily of industrial uses to the north, mixed-use and residential uses to the east, and commercial uses to the south and west. The Project proposes to remove the existing on-site structures and develop a new, modern U-Haul Moving and Storage facility. In addition to providing U-Haul truck and trailer sharing and retail sales, the location would house regional U-Haul marketing operations. The Project includes a Zone Text Amendment (ZTA), a Zone Change (ZC), a Conditional Use Permit (CUP), and Site Plan Review (SPR) to allow for expansion of the self-storage facility.

The Project would be subject to the requirements of Gardena Municipal Code Section 18.34, *Heavy Commercial Zone (C-4)*, which addresses permitted and prohibited development intended to provide for highway related uses. Section 18.34.030 establishes uses permitted within the C-4 zone that are subject to a CUP; self-storage facilities are a use that is subject to a CUP. Section 18.34.050 discusses property development standards that apply to all land and buildings in the C-4 zone. Additionally, the Project would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses fences, hedges and walls; setbacks; security and lighting plans, and pedestrian amenities, amongst others.

As part of the City's Site Plan Review process required under Gardena Municipal Code Chapter 18.44, *Site Plan Review*, the Project site plan would be reviewed and only approved after finding the proposed development, including the uses and the physical design of the development is consistent with the intent and general purposes of the General Plan and provisions of the Gardena Municipal Code, and will not adversely affect the orderly and harmonious development of the area (Gardena Municipal Code Section 18.44.030, *Factors for Approval*). Although the Gardena Municipal Code does not identify specific

[1] California Department of Transportation, Scenic Highway System Lists, *List of Eligible and Officially Designated State Scenic Highways* and *List of Officially Designated County Scenic Highways*, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed October 19, 2021.

regulations governing scenic quality, the review process would ensure the physical design of the proposed Project is consistent and compatible with the site and surrounding area. Thus, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

**Mitigation Measures:** No mitigation measures are required.

***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.** The Project site and surrounding area currently experience lighting typical of an urbanized area, such as building interior and exterior lighting, parking lot security lighting, and street lighting along Rosecrans Avenue and Van Ness Avenue. The Project site is currently developed with a U-Haul facility and although the proposed Project would involve development of a larger, multi-story facility, similar types of lighting including interior building lighting and exterior lighting associated with building illumination, landscape lighting, parking lot lighting, and security lighting would occur within the site. The Project would provide an updated U-Haul facility incorporating modern materials including glass; however, the design and materials would not involve expansive use of glass or materials that would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The Project would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and Lighting Plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. Lighting plans are required to demonstrate an average of 2-foot candle for all public/common areas. Additionally, the placement, height, and direction of illumination of light standards would be reviewed as part of the Site Plan Review to ensure the proposed lighting would not adversely affect neighboring uses (Gardena Municipal Code Chapter 18.44, Section 18.44.030, *Factors for Approval*). The City would also review new lighting for conformance with the Building Energy Efficiency Standards in effect at the time of building permit application to ensure the minimum amount of lighting is used, and no light spillage would occur. Thus, compliance with the City's established regulatory framework, which would be verified through the City's plan review process would ensure potential impacts associated with proposed Project lighting would be reduced to a less than significant impact.

**Mitigation Measures:** No mitigation measures are required.

This page intentionally left blank.

## 4.2 Agriculture and Forestry Resources

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | | X |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | X |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)? | | | | X |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | | | | X |
| 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? | | | | X |

***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?***

***b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?***

**No Impact.** The City of Gardena does not contain any mapped Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[2] Further, the Project site is currently zoned General Commercial (C-3) and is not

[2] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/agriculture/, accessed October 19, 2021.

zoned for agricultural use, nor is the site under a Williamson Act contract. Thus, the Project would not involve the conversion of farmland to a non-agricultural use or conflict with existing zoning for agricultural use or a Williamson Act contract.

**Mitigation Measures:** No mitigation measures are required.

***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))?***

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

**No Impact.** As stated, the Project site is zoned General Commercial (C-3). No forest land, timberland, or timberland zoned Timberland Production occurs within the City. The Project site is located within an urbanized area and is currently developed with an existing U-Haul self-storage facility, with an unoccupied former restaurant building located within the southern portion of the site adjacent to Rosecrans Avenue. Thus, the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use.

**Mitigation Measures:** No mitigation measures are required.

***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.** Refer to Responses 4.2(a) through 4.2(d), above.

**Mitigation Measures:** No mitigation measures are required.

## 4.3 Air Quality

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | | | X | |
| b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | | | X | |
| c. Expose sensitive receptors to substantial pollutant concentrations? | | | X | |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | X | |

**South Coast Air Quality Management District (SCAQMD) Thresholds**

Mass Emissions Thresholds

The South Coast Air Quality Management District's (SCAQMD) significance criteria is relied upon to assess the potential for significant impacts to air quality. According to the SCAQMD, an air quality impact is considered significant if a proposed project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during project construction and operations, as shown in Table 4.3-1, *South Coast Air Quality Management District Emissions Thresholds*.

**Table 4.3-1**
**South Coast Air Quality Management District Emissions Thresholds**

| Criteria Air Pollutants and Precursors (Regional) | Construction-Related | Operational-Related |
|---|---|---|
| | Average Daily Emissions (pounds/day) | Average Daily Emissions (pounds/day) |
| Reactive Organic Gases (ROG) | 75 | 55 |
| Carbon Monoxide (CO) | 550 | 550 |
| Nitrogen Oxides ($NO_x$) | 100 | 55 |
| Sulfur Oxides ($SO_x$) | 150 | 150 |
| Coarse Particulates ($PM_{10}$) | 150 | 150 |
| Fine Particulates ($PM_{2.5}$) | 55 | 55 |

Source: South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993 ($PM_{2.5}$ threshold adopted June 1, 2007).

Localized Carbon Monoxide

In addition to the daily thresholds listed above, the proposed Project would be subject to the ambient air quality standards. These are addressed through an analysis of localized Carbon Monoxide (CO) impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million (ppm)
- 8-hour = 9 ppm

The significance of localized impacts depends on whether ambient CO levels near a project site exceed State and federal CO standards. The South Coast Air Basin (SCAB) has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the SCAQMD developed Local Significance Thresholds ("LSTs") for emissions of Nitrogen Oxide (NOx), CO, Coarse Particulate Matter ($PM_{10}$), and Fine Particulate Matter ($PM_{2.5}$) generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or State ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day. The City of Gardena is located within SCAQMD SRA 3 (Southwest Coastal LA County). Table 4.3-2, *Local Significance Thresholds (Construction/Operations)*, shows the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 3 with sensitive receptors located within 25 meters of the project site.

**Table 4.3-2**
**Local Significance Thresholds (Construction/Operations)**

| Project Size | Nitrogen Oxide (NOx) – lbs/day | Carbon Monoxide (CO) – lbs/day | Coarse Particulates ($PM_{10}$) – lbs/day | Fine Particulates ($PM_{2.5}$) – lbs/day |
|---|---|---|---|---|
| 1.0 acres | 91/91 | 664/664 | 5/2 | 3/1 |
| 2.0 acres | 131/131 | 967/967 | 8/2 | 5/2 |
| 5.0 acres | 197/197 | 1,796/1,796 | 15/4 | 8/2 |

Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology – Appendix C*, revised October 21, 2009.

***a) Conflict with or obstruct implementation of the applicable air quality plan?***

**Less Than Significant Impact.** As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires that each state with nonattainment areas prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the federal and State ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project site is located within South Coast Air Basin (SCAB), which is under SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which SCAB is in non-attainment. To reduce such emissions, the SCAQMD adopted the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the USEPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's *2016 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. While SCAG has recently adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal), the SCAQMD has not released an updated AQMP that utilizes information from Connect SoCal. The SCAQMD is planning to release the updated AQMP in 2022. As such, this consistency analysis is based off the 2016 AQMP and the 2016-2040 RTP/SCS. SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The SCAQMD considers projects that are consistent with the 2016 AQMP, which is intended to bring the Basin into attainment for all criteria pollutants, to also have less than significant cumulative impacts. The proposed Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: A proposed project would 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 the AQMP's air quality standards or the interim emissions reductions.

- **Consistency Criterion No. 2**: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project build-out phase.

Consistency Criterion No. 1 refers to the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). As shown in Tables 4.3-3 and 4.3-4, the proposed Project construction and operational emissions would be below SCAQMD's thresholds. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Thus, no impact is expected, and the Project would be consistent with the first criterion.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the 2016 AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, projects that are consistent with the applicable assumptions used in the development of the 2016 AQMP would not jeopardize attainment of the air quality levels identified in the 2016 AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

With respect to determining consistency with Consistency Criterion No. 2, it is important to recognize that air quality planning within the air basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

1. *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

Growth projections included in the 2016 AQMP form the basis for the projections of air pollutant emissions and are based on the General Plan land use designations and SCAG's 2016-2040 RTP/SCS demographics forecasts. The population, housing, and employment forecasts within the 2016-2040 RTP/SCS are based on local general plans as well as input from local governments, such as the City of Gardena. The SCAQMD has incorporated these same demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment) into the 2016 AQMP.

As discussed in Section 4.14, Population and Housing, the Project would not induce substantial unplanned population growth directly through new homes or, indirectly through the extension of roads or other infrastructure or, increased commercial development. Also, as discussed in Section 4.14, employment-generating uses currently occur within the site and have been anticipated by the General Plan. Currently,

there are eight to nine part-time employees for the retail store and eight corporate employees. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated. At completion, the facility would be staffed with between 10 and 15 employees, both full-time and part-time, and eight corporate employees during the sales office hours. Thus, the Project would be within the employment projections anticipated and planned for by the City's General Plan and would not increase growth beyond the AQMP's projections.

2. *Would the project implement all feasible air quality mitigation measures?*

The proposed Project would result in less than significant air quality impacts. Compliance with all feasible emission reduction measures identified by the SCAQMD would be required as identified in Responses (b) and (c). As such, the proposed Project meets this 2016 AQMP consistency criterion.

3. *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

The proposed Project would result in less than significant impacts with regard to localized concentrations during Project construction. As such, the proposed Project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

In conclusion, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the air basin. The proposed Project would not result in a long-term impact on the region's ability to meet State and federal air quality standards. Further, the proposed Project's long-term influence on air quality in the air basin would also be consistent with the SCAQMD and SCAG's goals and policies and is considered consistent with the 2016 AQMP. Therefore, the Project would be consistent with the above criteria and impacts would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

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

**Less Than Significant Impact.**

**Construction Emissions**

Project construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project site include ozone-precursor pollutants (i.e., Reactive Organic Gases [ROG] and NOx) and $PM_{10}$ and $PM_{2.5}$. Construction-generated emissions are short term and temporary, lasting only while construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

For purposes of this analysis, the duration of the proposed Project's construction activities was estimated to last approximately 18 months. The Project's construction-related emissions were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Proposed Project demolition, site preparation, and grading are anticipated to begin in early 2022. Building construction was estimated to begin in mid-2022 and last almost a full year until mid-2023. Paving and architectural coatings are anticipated to occur in mid-2023. The early 2022 construction start date used in the modeling results in a conservative analysis because CalEEMod uses cleaner emissions factors in future years due to improved emissions controls and fleet turnover. The exact construction timeline is unknown, however to be conservative, earlier dates were utilized in the modeling. This approach is conservative given that emissions factors decrease in future years due to regulatory and technological improvements and fleet turnover; refer to Appendix A, Air Quality/Energy/Greenhouse Gas Emissions Data, for additional information regarding the construction assumptions used in this analysis.

The Project's predicted unmitigated and mitigated maximum daily construction-related emissions are summarized in Table 4.3-3, *Unmitigated Construction-Related Emissions (Maximum Pounds Per Day)* and Table 4.3-4, Mitigated Construction-Related Emissions (Maximum Pounds Per Day).

As shown in Table 4.3-3 and Table 4.3-4, all criteria pollutant emissions would remain below their respective thresholds. While impacts would be considered less than significant, the proposed Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which would further reduce specific construction-related emissions. As the proposed Project emissions would not worsen ambient air quality, create additional violations of federal and state standards, or delay SCAB's goal for meeting attainment standards, impacts associated with Project construction emissions would be less than significant.

**Table 4.3-3**
**Unmitigated Construction-Related Emissions (Maximum Pounds Per Day)**

| Construction Year | Reactive Organic Gases (ROG) | Nitrogen Oxides (NOx) | Carbon Monoxide (CO) | Sulfur Oxides (SOx) | Coarse Particulates ($PM_{10}$) | Fine Particulates ($PM_{2.5}$) |
|---|---|---|---|---|---|---|
| 2022 | 3.2 | 33.1 | 21.6 | <0.1 | 21.5 | 11.6 |
| 2023 | 57.6 | 15.8 | 19.5 | <0.1 | 1.8 | 1.0 |
| **SCAQMD Threshold** | **75** | **100** | **550** | **150** | **55** | **150** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Source: CalEEMod version 2020.4.0 | | | | | | |

**Table 4.3-4**
**Mitigated Construction-Related Emissions (Maximum Pounds Per Day)**

| Construction Year | Reactive Organic Gases (ROG) | Nitrogen Oxides (NOx) | Carbon Monoxide (CO) | Sulfur Oxides (SOx) | Coarse Particulates ($PM_{10}$) | Fine Particulates ($PM_{2.5}$) |
|---|---|---|---|---|---|---|
| 2022 | 3.2 | 33.1 | 21.6 | <0.1 | 9.5 | 5.5 |
| 2023 | 57.6 | 15.8 | 19.5 | <0.1 | 1.8 | 1.0 |
| **SCAQMD Threshold** | **75** | **100** | **550** | **150** | **55** | **150** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

Source: CalEEMod version 2020.4.0

Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment; refer to Appendix A for model outputs.

**Operational Emissions**

The Project's operational emissions would be associated with motor vehicle use and area sources. Area sources include natural gas for space and water heating, gasoline-powered landscaping and maintenance equipment, and consumer products (such as household cleaners). Mobile sources emissions are generated from vehicle operations associated with Project operations. Typically, area sources are small sources that contribute very minor emissions individually, but when combined may generate substantial amounts of pollutants. Area specific defaults in CalEEMod were used to calculate area source emissions.

CalEEMod was also used to calculate pollutants emissions from vehicular trips generated from the proposed Project. The vehicle trip rate for the Project was obtained from the *Transportation Memorandum* prepared by Kittelson & Associates; refer to Appendix G. CalEEMod default inputs for vehicle mix and trip distances were unaltered for this analysis. CalEEMod estimated emissions from Project operations are summarized in Table 4.3-5, *Operational-Related Emissions (Maximum Pounds Per Day)*.[3] Note that emissions rates differ from summer to winter because weather factors are dependent on the season and these factors affect pollutant mixing, dispersion, ozone formation, and other factors.

As shown in Table 4.3-5, emission calculations generated from CalEEMod demonstrate that Project operations would not exceed the SCAQMD thresholds for any criteria air pollutants. Therefore, Project operational impacts would be less than significant.

[3] Note: Unmitigated and mitigated operational-related emissions were the same; therefore, both emissions results were consolidated into a single table, Table 4.3-5.

**Table 4.3-5**
**Operational-Related Emissions (Maximum Pounds Per Day)**

| Source | Reactive Organic Gases (ROG) | Nitrogen Oxides (NOx) | Carbon Monoxide (CO) | Sulfur Oxides (SOx) | Coarse Particulates ($PM_{10}$) | Fine Particulates ($PM_{2.5}$) |
|---|---|---|---|---|---|---|
| **Summer Emissions** | | | | | | |
| Area Source | 4.1 | <0.1 | <0.1 | 0 | <0.1 | <0.1 |
| Energy | <0.1 | 0.2 | 0.2 | <0.1 | <0.1 | <0.1 |
| Mobile | 0.4 | 0.5 | 4.7 | <0.1 | 1.1 | 0.3 |
| **Total** | **4.6** | **0.7** | **4.9** | **<0.1** | **1.1** | **0.3** |
| **SCAQMD Threshold** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Winter Emissions** | | | | | | |
| Area Source | 4.1 | <0.1 | <0.1 | 0 | <0.1 | <0.1 |
| Energy | <0.1 | 0.2 | 0.2 | <0.1 | <0.1 | <0.1 |
| Mobile | 0.4 | 0.5 | 4.6 | <0.1 | 1.1 | 0.3 |
| **Total** | **4.6** | **0.7** | **4.8** | **<0.1** | **1.1** | **0.3** |
| **SCAQMD Threshold** | **55** | **55** | **550** | **150** | **150** | **55** |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Source: CalEEMod Version 2020.4.0; refer to Appendix A for model outputs. | | | | | | |

**Area Source Emissions**

Area source emissions would be generated due to consumer products, architectural coating, hearths, and landscaping. As shown in Table 4.3-5, the Project's unmitigated area source emissions would not exceed SCAQMD thresholds for either the winter or summer seasons. Therefore, impacts would be less than significant and mitigation measures are not required.

**Energy Source Emissions**

Energy source emissions would be generated due to the Project's electricity and natural gas usage. The Project's primary uses of electricity and natural gas would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in Table 4.3-5, the Project's unmitigated energy source emissions would not exceed SCAQMD thresholds for criteria pollutants. As such, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Therefore, the Project's operational air quality impacts would be less than significant.

**Mobile Source**

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NOx, $PM_{10}$, and $PM_{2.5}$ are all pollutants of regional concern. NOx and

ROG react with sunlight to form $O_3$, known as photochemical smog. Additionally, wind currents readily transport $PM_{10}$ and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using CalEEMod, as recommended by the SCAQMD. The Project's trip generation estimates were based on the Institute of Transportation Engineers (ITE) trip generations rates provided in the Local Transportation Assessment prepared by Kittelson & Associates; refer to Appendix G. The proposed Project would generate 120 net new average daily trips (ADT). As shown in Table 4.3-5, mobile source emissions would not exceed SCAQMD thresholds for criteria pollutants. Therefore, the Project's air quality impacts associated with mobile source emissions would be less than significant.

**Cumulative Short-Term Emissions**

SCAB is designated nonattainment for $O_3$, $PM_{10}$, and $PM_{2.5}$ for State standards and nonattainment for $O_3$ and $PM_{2.5}$ for Federal standards. As discussed above, the Project's construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether individual Project emissions have the potential to affect cumulative regional air quality, it can be expected that the Project-related construction emissions would not be cumulatively considerable. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related cumulative projects. As concluded above, the Project's construction-related impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Therefore, Project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

**Cumulative Long-Term Impacts**

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As shown in Table 4.3-5, the Project's operational emissions would not exceed SCAQMD thresholds. As a result, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project

operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant and impacts would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

***c) Expose sensitive receptors to substantial pollutant concentrations?***

**Less Than Significant Impact.**

**Localized Construction Significance Analysis**

The nearest sensitive receptor to the Project site is the residential development directly east of the Project site, which at the time of this analysis is under construction and partially occupied. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

The maximum daily disturbed acreage would be 4.2 acres (the gross area of the Project site). The appropriate SRA for the LSTs is the Southwest Coastal LA County area (SRA 3), since SRA 3 includes the Project site. LSTs apply to CO, NOx, $PM_{10}$, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5.0 acres. As stated, Project construction is anticipated to disturb a maximum of 4.2 acres in a single day.

The SCAQMD's methodology 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. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, as recommended by the SCAQMD, LSTs for receptors located at 25 meters were utilized in this analysis (consistent with SCAQMD guidance, since the nearest receptor is within 25 meters from the Project site). Table 4.3-6, *Localized Significance of Construction Emissions (Maximum Pounds per Day)*, presents the results of localized emissions during proposed Project construction.

As shown in Table 4.3-6, the emissions of these pollutants on the peak day of Project construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Further, the Project would be subject to compliance with SCAQMD Rules 402, 403, and 1113, which would further reduce specific construction-related emissions. Therefore, the proposed Project would result in a less than significant impact concerning LSTs during construction activities.

**Table 4.3-6**
**Localized Significance of Construction Emissions (Maximum Pounds per Day)[1]**

| Construction Activity | Nitrogen Oxides (NOx) | Carbon Monoxide (CO) | Coarse Particulates (PM10) | Fine Particulates (PM2.5) |
|---|---|---|---|---|
| Demolition (2022) | 25.7 | 20.6 | 2.1 | 1.3 |
| Site Preparation (2022) | 33.1 | 19.7 | 9.3 | 5.4 |
| Grading (2022) | 20.9 | 15.3 | 3.7 | 2.2 |
| Building Construction (2022) | 15.6 | 16.4 | 0.8 | 0.8 |
| Building Construction (2023) | 14.4 | 16.2 | 0.7 | 0.7 |
| Paving (2023) | 8.8 | 12.2 | 0.4 | 0.4 |
| Architectural Coating (2023) | 1.3 | 1.8 | <0.1 | <0.1 |
| SCAQMD Localized Screening Thresholds (5 acres at 25 meters) | 197 | 1,796 | 15 | 8 |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** |
| Source: CalEEMod Version 2020.4.0; refer to Appendix A for model outputs. | | | | |
| Notes:<br>1. Emissions reflect on-site construction emissions only, per SCAQMD guidance. | | | | |

**Localized Operational Significance Analysis**

The on-site operational emissions are compared to the LST thresholds in Table 4.3-7, *Localized Significance of Operational Emissions (Maximum Pounds per Day)*. Table 4.3-7 shows that the maximum daily emissions of these pollutants during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the proposed Project would result in a less than significant impact concerning LSTs during operational activities.

**Table 4.3-7**
**Localized Significance of Operational Emissions (Maximum Pounds per Day)**

| Emission Sources | Nitrogen Oxides (NOx) | Carbon Monoxide (CO) | Coarse Particulates (PM10) | Fine Particulates (PM2.5) |
|---|---|---|---|---|
| On-Site Emissions (Area Sources) | 0.7 | 4.8 | 1.1 | 0.3 |
| SCAQMD Localized Screening Threshold (5 acres at 50 meters) | 197 | 1,796 | 4 | 2 |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** |
| Source: CalEEMod version 2020.4.0; refer to Appendix A for model outputs. | | | | |

The Project would not involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, and no significant toxic airborne emissions would result from operation of the proposed Project. Construction activities are subject to the regulations and laws relating to toxic air pollutants at

the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

**Criteria Pollutant Health Impacts**

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (Sierra Club v. County of Fresno [Friant Ranch, L.P.] [2018] 6 Cal.5th 502). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts would occur.

NOx and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. Breathing ground-level ozone can result in health effects that include: reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According to the SCAQMD's 2016 AQMP, ozone, NOx, and ROG have been decreasing in the SCAB since 1975 and are projected to continue to decrease in the future. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NOx and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NOx emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2016 AQMP demonstrates how the SCAQMD's control strategy to meet the 8-hour ozone standard in 2023 would lead to sufficient NOx emission reductions to attain the 1-hour ozone standard by 2022. In addition, since NOx emissions also lead to the formation of $PM_{2.5}$, the NOx reductions needed to meet the ozone standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The SCAQMD's air quality modeling demonstrates that NOx reductions prove to be much more effective in reducing ozone levels and will also lead to a significant decrease in $PM_{2.5}$ concentrations. NOx-emitting stationary sources regulated by the SCAQMD include Regional Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The 2016 AQMP

identifies robust NOx reductions from new regulations on RECLAIM facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NOx emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The AQMP plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies.

The 2016 AQMP also emphasized that beginning in 2012, continued implementation of previously adopted regulations will lead to NOx emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP proposed regulatory measures, a 30 percent reduction of NOx from stationary sources is expected in the 15-year period between 2008 and 2023. This is in addition to significant NOx reductions from stationary sources achieved in the decades prior to 2008.

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds; refer to Table 4.3-3 and Table 4.3-4. Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant; refer to Table 4.3-5, Table 4.3-6, and Table 4.3-7. The LSTs represent the maximum emissions from a Project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels more than the health-based ambient air quality standards.

**Carbon Monoxide Hotspots**

An analysis of CO “hot spots” is needed to determine whether the change in the level of service of an intersection resulting from the proposed Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. The 2016 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with approximately 100,000 average daily traffic (ADT), was modeled for CO concentrations. This modeling effort identified a CO

concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 ADT, it can be reasonably inferred that CO hotspots would not be experienced at any Project area intersections from the net new 120 ADT attributable to the proposed Project. Therefore, impacts would be less than significant.

**Construction-Related Diesel Particulate Matter**

Project construction would generate diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminants (TAC) emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The closest sensitive receptors to the Project site are located adjacent to the Project site to the east. The use of diesel-powered construction equipment would be temporary and episodic and occur throughout the Project site. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from diesel particulate matter (DPM). Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by Project construction activities, in and of itself, would not expose sensitive receptors to substantial amounts of air toxins and the proposed Project would result in a less than significant impact.

**Mitigation Measures:** No mitigation measures are required.

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

**Less Than Significant Impact.**

**Construction**

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number*

> *of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant.

**Operational**

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes development of a U-Haul storage facility, which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the proposed Project would not create objectionable odors and impacts would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

This page intentionally left blank.

## 4.4 Biological Resources

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | X |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | X |
| 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? | | | | X |
| 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? | | X | | |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | X | |
| 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? | | | | X |

***a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans,***

***policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

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

***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.** The Project site is located within an urbanized area and is currently developed with an existing U-Haul self-storage facility and an unoccupied former restaurant building located within the southern portion of the site adjacent to Rosecrans Avenue, as well as surface parking. The surrounding area is developed and comprised primarily of commercial uses to the south and west, industrial uses to the north and a mixed-use residential development immediately east of the site. There are no candidate, sensitive, or special status plant or wildlife species on the Project site or adjacent properties. Further, there are no riparian habitats or wetlands within the Project site and surrounding area. Therefore, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any special status plant or wildlife species, any riparian habitat or other sensitive natural community, or on any state or federally protected wetlands.

**Mitigation Measures:** No mitigation measures are required.

***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?***

**Less Than Significant Impact With Mitigation Incorporated.** The Project site is currently developed with an existing U-Haul self-storage facility, an unoccupied former restaurant building located within the southern portion of the site adjacent to Rosecrans Avenue, as well as surface parking. The surrounding area is developed and comprised primarily of commercial uses to the south and west, industrial uses to the north, and a mixed-use residential development immediately east of the site. The Project site and surrounding area do not serve as a native resident or migratory wildlife corridor or wildlife nursery site, as the area is completely developed and there are no open space areas or corridors within or adjacent to the Project site.

The Project would involve the removal of trees located along the northern Project boundary, but replacement trees and landscaping would be provided. Although not anticipated, there is the potential for trees to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC). Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to nonmigratory birds identified as resident game birds (CFGC Section 3500) and any birds in the orders

Falconiformes or Strigiformes (birds-of-prey) (CFGC Section 3503). To address potential impacts to migratory birds, development within the Project site would be subject to compliance with Mitigation Measure BIO-1, which would require construction outside of the nesting season for migratory birds, or a pre-construction survey be conducted prior to initiating construction activities. If active nests are found, a Nesting Bird Plan would be required to be prepared and implemented. Implementation of Mitigation Measure BIO-1 would reduce potential impacts to nesting migratory birds to a less than significant level.

**Mitigation Measures:**

BIO-1: Construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (i.e., typically March 15 through September 1), if possible. If construction activities cannot be conducted outside of nesting season, a Pre-Construction Nesting Bird Survey within and adjacent to the Project site shall be conducted by a qualified biologist within three days prior to initiating construction activities. If active nests are found during the Pre-Construction Nesting Bird Survey, a Nesting Bird Plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, nesting sage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity.

***e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**Less Than Significant Impact.** Gardena Municipal Code Chapter 13.60, *Trees, Shrubs, and Plants*, regulates the placement and provides for the proper selection of new trees to minimize problems in public facilities, and establishes requirements for the preservation and proper maintenance of existing trees located on public property, as well as certain trees located on private property, that are deemed important to the general welfare and the benefit of the community. Gardena Municipal Code Section 13.60.080, *Permit*, requires a Trimming Permit, Tree Removal Permit, and/or a Tree Planting Permit for cutting, trimming, pruning, planting, removing, injuring or interfering with any tree, shrub or plant upon any Street or Public Place of the City. The Project may involve the removal of street trees along the frontage of the Project site. The Project would be responsible for providing new street trees as required by the City as part of the plan review process. Upon approval of the Project, removal of these trees would be allowed pursuant to Gardena Municipal Code Section 13.60.110, *Tree Removal Criteria*. Additionally, the Project would provide new trees, palms, shrubs, and ground cover along the Project site's frontage. The proposed trees and landscaping would be in accordance with the City's requirements. Thus, the Project would not conflict with any local policies or ordinances protection biological resources.

**Mitigation Measures:** No mitigation measures are required.

***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.** The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Thus, the Project would not conflict with any of these plans and no impact would occur.

**Mitigation Measures:** No mitigation measures are required.

## 4.5 Cultural Resources

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | | | | X |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | | X | | |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | | X | | |

This section is based on the *Cultural and Paleontological Resources Assessment for the Van Ness Avenue U-Haul Project, City of Gardena, Los Angeles County, California* (Cultural Resources Assessment), prepared by Cogstone, dated January 2022 and included in its entirety as Appendix B, Cultural Resources Assessment.

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

***No Impact*.** There are currently three historic-aged buildings within the Project site: U-Hall Moving and Storage of Gardena (two buildings at 14202 and 14206 Van Ness Avenue) and one vacant restaurant (2145 Rosecrans Avenue).

A search of the California Historic Resources Information System (CHRIS) was performed at the South Central Coastal Information Center (SCCIC) that includes the Project site and a one-half mile radius. Results of the records search indicate that two previous studies had been completed within one-half mile of the Project area; none of which included the Project site. No previously recorded cultural resources are located within the Project site or the half-mile search radius. In addition to the SCCIC records search, additional sources were consulted, including the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), California Built Environment Resource Directory (BERD), California Historical Landmarks (CHL), and the California Points of Historical Interest (CPHI). Review of historic-era maps and aerial photographs were also conducted.

For purposes of historic built environment resources, a survey of the Project site was conducted to identify and verify the location of all structures and buildings within the Project site that are 45 years in age or older.

According to the Cultural Resources Assessment, the U-Haul main storage building (14202 and 14206 Van Ness Avenue) and U-Haul Administration Building (14202 Van Ness Avenue) are not associated with

events that have made a significant contribution to the broad patterns of our history; are not associated with the lives of persons significant in our past; do not embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; have not, nor are likely to yield, information important in prehistory or history. Thus, the buildings are not recommended eligible for the California Register of Historical Resources, as they do not meet the criteria for listing, and are therefore not recommended as a "historic resource" under CEQA. Further, the buildings have been altered and new signage and decorative elements have been added, resulting in a substantial loss of Integrity of *Design*, *Materials*, *Setting*, *Workmanship*, and *Feeling.*

Similarly, the Cultural Resources Assessment determined the former restaurant building (2145 Rosecrans Avenue) is not associated with events that have made a significant contribution to the broad patterns of our history; is not associated with the lives of persons significant in our past; does not embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; has not, nor is likely to yield, information important in prehistory or history. Thus, the building is not recommended eligible for the California Register of Historical Resources, as it does not meet the criteria for listing, and is therefore not recommended as a "historic resource" under CEQA. Further, due to major alterations to the building in 2007/2008, the building has lost a substantial degree of Integrity of *Design*, *Materials*, *Setting*, *Workmanship*, and *Feeling.*

As no historic or potentially historic built environment resources are located within the site, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 and no impact would occur.

***Mitigation Measures:*** No mitigation measures are required.

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

***Less Than Significant Impact with Mitigation Incorporated.*** As stated above, results of the records search indicate that two previous studies had been completed within one-half mile of the Project area; none of which included the Project site. No previously recorded cultural resources are located within the Project site or within the half-mile search radius. A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on June 10, 2021. On July 1, 2021, the NAHC responded that a search of the SLF was completed with negative results. An intensive pedestrian survey for archaeological resources was not conducted as the Project site is almost completely developed, landscaped or hardscaped.

The absence of survey coverage within previous cultural studies, and small number of the previous cultural studies in the Project vicinity indicates there is a high likelihood that the lack of previously recorded resources is due to the absence of investigation rather than absence of resources. The Geotechnical Evaluation (Ninyo and Moore 2021) and geoarchaeological analyses for the Project indicate that there are intact native sediments capable of preserving cultural resources at two to four feet below the surface in some parts of the Project site. Considering this information, the Cultural Resources Assessment

determined the Project site has moderate sensitivity for prehistoric cultural resources and low to moderate sensitivity for buried historic-aged cultural resources such as foundations and trash deposits.

Due to moderate cultural sensitivity for buried cultural prehistoric resources and low to moderate sensitivity for buried historic-aged cultural resources, cultural resources monitoring would be required on a spot check basis during excavations in the Project site that are deeper than two feet. In the event of an unanticipated cultural resources discovery, all work would be suspended within 50 feet of the find until it is evaluated by a qualified archaeologist (Mitigation Measure CUL-1). Prior to initiating ground disturbance activity, a Worker Environmental Awareness Program training presentation would be prepared and provided by a qualified archaeologist to all personnel engaged in ground disturbance, including supervisory staff overseeing the work (Mitigation Measure CUL-2).

With implementation of Mitigation Measures CUL-1 and CUL-2, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 and impacts would be less than significant.

For potential impacts related to tribal cultural resources, refer to Section 4.18, Tribal Cultural Resources.

***Mitigation Measures:***

CUL-1: Prior to the beginning of ground disturbances, the Project proponent shall retain an archaeologist meeting Secretary of the Interior Standards (SOI) to oversee spotcheck cultural resources monitoring of all excavations two feet and deeper within the Project site. Spotchecks shall occur weekly on average, and no less often than once every seven days that ground disturbance occurs. If a cultural object is uncovered, the qualified monitor shall be empowered to temporarily redirect work away from the find while it is evaluated. Work can continue a minimum of 50 feet away from the find. For finds that are not significant, work may resume immediately after the find is documented and removed. If a find is significant, a mitigation plan shall be developed, and mitigation completed, prior to work continuing within the 50-foot cordon.

CUL-2: Prior to the beginning of ground disturbances, the qualified monitor shall give a Worker Environmental Awareness Program training presentation prepared by the SOI qualified supervising archaeologist to all construction staff. This presentation shall inform construction personnel what cultural resources may be uncovered during the ground-disturbing phases of the project and what to do who to in case of a find.

***c) Disturb any human remains, including those interred outside of dedicated cemeteries?***

***Less Than Significant Impact With Mitigation Incorporated.*** There are no dedicated cemeteries within the Project site or surrounding area. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed above, there are no known archaeological resources within the Project site or surrounding area; however, the potential for archaeological resources is considered moderate. There is the potential for previously unknown human remains to be discovered/disturbed during the Project's ground disturbing activities, resulting in a potentially significant impact. Implementation of Mitigation Measure CUL-3 and TCR-3 (refer to Section 4.18, Tribal Cultural Resources) would ensure that in the event human remains are discovered, the remains would be handled in accordance with applicable laws, including California Health and Safety Code §7050.5, Public Resources

Code §5097.98 and the California Code of Regulations §15064.5(e). Thus, with implementation of Mitigation Measures CUL-1 and TCR-3, impacts associated with the potential disturbance of human remains would be reduced to a less than significant level.

***Mitigation Measures:***

CUL-3: Refer also to Mitigation Measure TCR-3 (Section 4.18, Tribal Cultural Resources). Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial shall cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The Los Angeles County Coroner shall be immediately notified and must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC), who will in turn, notify the person they identify as the Most-Likely-Descendent (MLD) of any human remains.

## 4.6 Energy

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | X | |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | X | |

**REGULATORY FRAMEWORK**

**California Building Energy Efficiency Standards (Title 24)**

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, rooftop solar panels, and other features that reduce energy consumption in homes and businesses.

**California Green Building Standards (CALGreen)**

The 2019 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2020. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of greenhouse gas (GHG) emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g. lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials (U.S. Green Building Council, 2020).

**Senate Bill 100**

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) 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 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board or the California Air Resources Board's (CARB), and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of SB 100.

**City of Gardena Climate Action Plan**

The City of Gardena, in cooperation with the South Bay Cities Council of Governments (SBCCOG), developed the City of Gardena Climate Action Plan (CAP) (December 2017) to reduce GHG emissions within the City. The CAP serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policy to achieve desired outcomes over the next 20 years. The CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2005 levels by 2020 and 49 percent of 2005 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including Land Use and Transportation (LUT), Energy Efficiency (EE), Solid Waste (SW), Urban Greening (UG), and Energy Generation and Storage (EGS). Reduction measures include accelerating the market for electric vehicles, encouraging alternative transportation choices, increasing energy efficiency in existing buildings, reducing energy consumption, increasing solid waste diversion, and supporting energy generation in the community.

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

***Less Than Significant Impact.*** The means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed Project would be considered "wasteful, inefficient, and unnecessary" if it were to violate State and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The Project proposes to remove the existing on-site structures and develop a new, modern U-Haul Moving and Storage facility. The amount of energy used at the Project site would directly correlate to the size of the proposed structures, the energy consumption of associated facility uses, and outdoor lighting. Other major sources of Project energy consumption include fuel used by vehicle trips generated during Project construction and operation, and fuel used by off-road construction vehicles during construction.

The following discussion provides calculated levels of energy use expected for the proposed Project, based on commonly used modelling software (i.e. CalEEMod v.2020.4.0 and the California Air Resource Board's EMFAC2021). It should be noted that many of the assumptions provided by CalEEMod are conservative relative to the Project; thus, this discussion provides a conservative estimate of proposed Project emissions.

**Electricity and Natural Gas**

Electricity and natural gas used by the Project would be used primarily to power on-site buildings. Total annual natural gas (kBTU) and electricity (kWh) usage associated with the operation of the Project are shown in Table 4.6-1, *Project Operational Natural Gas and Electricity Usage*.

**Table 4.6-1**
**Project Operational Natural Gas and Electricity Usage**

| Emissions | Project Annual Consumption | Los Angeles County Annual Consumption | Percent Increase |
|---|---|---|---|
| Natural Gas Consumption (therms) | 7,336 | 2,921,000,000 | 0.0003% |
| Electricity Consumption (MWh/year) | 826 | 68,486,000 | 0.0012% |
| Sources: CalEEMod version 2020.4.0; California Energy Commission, Electricity Consumption by County; Natural Gas Consumption by County. | | | |

CalEEMod uses the California Commercial End Use Survey (CEUS) database to develop energy intensity value for non-residential buildings.

As shown in Table 4.6-1, Project operational natural gas usage is forecast to represent an approximately 0.0003 percent increase above the County's typical annual electricity consumption, and approximately 0.0012 percent increase above the county's typical natural gas consumption. These increases are minimal in the context of the County as a whole.

**On-Road Vehicles (Operation)**

The Project would generate vehicle trips during its operational phase. According to the *Transportation Memorandum* prepared by Kittelson & Associates (refer to Appendix G), the Project would generate approximately 120 net new average daily vehicle trips. In order to calculate operational on-road vehicle energy usage and emissions, default trip lengths generated by CalEEMod (version 2020.4.0) were used, which are based on the Project location and urbanization level parameters selected within CalEEMod; refer to Appendix A. The Project would generate an estimated total of approximately 1,409 net new average daily vehicle miles traveled (Average Daily VMT).[4] Based on fleet mix data provided by CalEEMod and Year 2022 gasoline and diesel miles per gallon (MPG) factors for individual vehicle classes as provided by EMFAC2021, a weighted MPG factor for operational on-road vehicles of approximately 25.5 MPG for

[4] Estimated VMT is generated from CalEEMod based upon the number of Project trips and an average trip length. CalEEMod average trip lengths are used since the Project satisfies the City's SB 743 Implementation Guidance criteria for VMT screening and a detailed VMT analysis is not required; refer to Section 4.17, *Transportation*.

gasoline vehicles were derived. Based on 24.5 MPG and 1,409 net new Average Daily VMT, the Project would generate vehicle trips that would use approximately 57 gallons of gasoline per day or 20,973 gallons of gasoline per year.

**On-Road Vehicles (Construction)**

The Project would also generate on-road vehicle trips during Project construction (from construction workers and vendors). Estimates of anticipated vehicle fuel consumption were derived based on the assumed construction schedule, vehicle trip lengths, and number of workers per construction phase as provided by CalEEMod, and Year 2020 gasoline MPG factors provided by EMFAC2021. It was assumed that all vehicles would use gasoline as a fuel source (as opposed to diesel fuel or alternative sources). Table 4.6-2, *On-Road Mobile Fuel Generated by Project Construction Activities – By Phase*, describes gasoline and diesel fuel used by on-road mobile sources during each phase of the construction schedule. As shown, the vast majority of on-road mobile vehicle fuel used during the construction of the Project would occur during the building construction phase.

**Table 4.6-2**
**On-Road Mobile Fuel Generated by Project Construction Activities – By Phase**

| Construction Phase | # of Days | Total Daily Worker Trips[1] | Total Daily Vendor Trips[1] | Total Hauler Trips[1] | Gallons of Gasoline Fuel[2] | Gallons of Diesel Fuel[2] |
|---|---|---|---|---|---|---|
| Demolition | 20 | 15 | 0 | 197 | 174 | 642 |
| Site Preparation | 21 | 18 | 0 | 0 | 219 | 0 |
| Grading | 45 | 15 | 0 | 0 | 392 | 0 |
| Building Construction | 240 | 77 | 30 | 0 | 10,727 | 8,090 |
| Paving | 30 | 20 | 0 | 0 | 348 | 0 |
| Architectural Coating | 30 | 15 | 0 | 0 | 261 | 0 |
| | | | **Total** | **197** | **12,121** | **8,732** |

Sources: CalEEMod Version 2020.4.0; EMFAC2021.

Notes:
1. Provided by CalEEMod.
2. Refer to Appendix A for further detail.

**Off-Road Vehicles (Construction)**

Off-road construction vehicles would use diesel fuel during the construction phase of the Project. Off-road construction vehicles expected to be used during the construction phase of the Project include, but are not limited to, cranes, forklifts, generator sets, tractors, excavators, and dozers. Based on the total amount of $CO_2$ emissions expected to be generated by the proposed Project (as provided by the CalEEMod output), and a $CO_2$ to diesel fuel conversion factor (provided by the U.S. Energy Information Administration), the Project would use up to approximately 12,680 gallons of diesel fuel for off-road construction vehicles during the site preparation and grading phases of the Project; refer to Appendix A for detailed calculations.

**Conclusion**

The proposed Project would use energy resources for the operation of the Project buildings, for on-road vehicle trips (e.g. gasoline and diesel fuel) generated by the Project (both during Project construction and operation), and from off-road construction activities associated with the Project (e.g. diesel fuel). Each of these activities would require the use of energy resources. The Project would be responsible for conserving energy, to the extent feasible, and would be required to comply with Statewide and local measures regarding energy conservation, such as Title 24 building efficiency standards. It should be noted that the analysis provided herein does not account for any reduction in energy generation from existing on-site structures and operations, which would be removed as a result of the proposed Project. The existing U-Haul facility utilizes energy resources associated with business operations, including from vehicle trips accessing the site. Therefore, the analysis provided represents a conservative analysis of the proposed Project's energy usage.

The proposed Project would be in compliance with all applicable federal, State, and local regulations regulating energy usage. For example, Southern California Edison (SCE) is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the Statewide Renewable Portfolio Standard (RPS) to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. SCE has achieved at least a 33 percent mix of renewable energy resources, and will be required to achieve a renewable mix of at least 50 percent by 2030. Additionally, energy-saving regulations, including the latest State Title 24 building energy efficiency standards ("part 6"), would be applicable to the proposed Project. The existing U-Haul facility was constructed in 1957 (main building) and 1958 (administration building) and replacement of the facility with modern buildings that incorporate Title 24 building energy efficiency standards would provide improved energy efficiency when compared to existing conditions. Other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g. the Pavley Bill and the Low Carbon Fuel Standard) are improving vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time.

As a result, the Project would not result in any significant adverse impacts related to Project energy requirements, energy use inefficiencies, and/or the energy intensiveness of materials by amount and fuel type for each stage of the Project including construction, operations, maintenance, and/or removal. Both SCE, the electricity provider to the site, and Southern California Gas, the natural gas provider to the site, maintain sufficient capacity to serve the proposed Project. The Project would be required to comply with all existing energy efficiency standards, and would not result in significant adverse impacts on energy

resources. Therefore, the proposed Project would not result in a wasteful, inefficient, or unnecessary of energy resources during Project construction or operation. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

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

***Less Than Significant Impact.*** Table 4.6-3, *Gardena Climate Action Plan Project Consistency Analysis*, provides an analysis of the Project's consistency with applicable policies in the *City of Gardena Climate Action Plan* (CAP), 2017. The Project would be required to comply with the most recent version of CALGreen, which requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g. lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. As indicated in Table 4.6-3, the Project would be consistent with the measures identified in the City's CAP and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; impacts would be less than significant.

**Table 4.6-3**
**Gardena Climate Action Plan Project Consistency Analysis**

| Gardena Climate Action Plan Measure | Consistency Analysis |
|---|---|
| Measure LUT: G1 – Increase Density | Consistent. The Project proposes to rezone the site to allow for a higher density infill commercial development. Further, the Project site is located within a high-quality transit area. |
| Measure EE: B1 – Encourage or Require Energy Efficiency Standards Exceeding Title 24 | Consistent. The Project would be required to comply with the 2019 version of the Title 24 CALGreen standards, or such later version which is in effect at the time building plans are submitted, which provide higher energy efficiency requirements as compared to the earlier version of Title 24 standards. |
| Measure EE: E1 – Promote or Require Water Efficiency Through SB X7-7 | Consistent. The Project would be required to comply with the 2019 version of the Title 24 CALGreen standards, or such later versions which is in effect at the time building plans are submitted, which include water efficiency standards the exceed the water efficiency requirements contained in previous versions of the Title 24 standards. |
| Source: City of Gardena Climate Action Plan, December 2017. | |

***Mitigation Measures:*** No mitigation measures are required.

## 4.7 Geology and Soils

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| 1) 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. | | | X | |
| 2) Strong seismic ground shaking? | | | X | |
| 3) Seismic-related ground failure, including liquefaction? | | | X | |
| 4) Landslides? | | | | X |
| b. Result in substantial soil erosion or the loss of topsoil? | | | X | |
| 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? | | | X | |
| 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? | | | X | |
| 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? | | | | X |
| f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | X | | |

This section is based on the *Geotechnical Evaluation New U-Haul Facility 14206 Van Ness Avenue, Gardena, California* (Geotechnical Evaluation), prepared by Ninyo & Moore, dated December 15, 2021 and included in its entirety as Appendix D, Geotechnical Evaluation and the *Cultural and Paleontological Resources Assessment for the Van Ness Avenue U-Haul Project, City of Gardena, Los Angeles County, California* (Cultural Resources Assessment), prepared by Cogstone, dated January 2022 and included in its entirety as Appendix B, Cultural Resources Assessment.

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

***1) 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.***

**Less than Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. 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 (typically 50 feet). According to the Geotechnical Evaluation, there are no active or potentially active faults known to cross the Project site and the site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the probability of damage from surface fault rupture is considered to be low and impacts would be less than significant in this regard.

**Mitigation Measures:** No mitigation measures are required.

***2) Strong seismic ground shaking?***

**Less Than Significant Impact.** The Project site is located in a seismically active area that has historically been affected by moderate to occasionally high levels of ground motion. There are several faults within the region, including the Newport-Inglewood fault zone located approximately 1.7 miles northwest of the site, capable of producing a maximum moment magnitude of 6.0 or more. As a result, the Geotechnical Evaluation indicates the potential for strong ground motion in the Project area to be considered significant during the design life of the proposed Project. Therefore, the Project could expose people or structures to potential adverse effects as a result of strong seismic ground shaking. The intensity of ground shaking on the Project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the Project site and epicenter.

The Geologic Evaluation concluded that development of the Project, as proposed, is feasible from a geotechnical point of view provided the recommendations presented in the Geologic Evaluation are incorporated into the design and construction of the Project. The Geotechnical Evaluation includes specific recommendations based on the results of the subsurface evaluation and laboratory testing, review of referenced geologic materials, and geotechnical analysis. Specific recommendations address earthwork, seismic design parameters, foundations, lateral earth pressures, underground utilities,

sidewalk and hardscapes, preliminary pavement design, corrosivity, concrete placement, and drainage. Further, design of the proposed structures in accordance with the current California Building Code is anticipated to adequately mitigate concerns with ground shaking.

Pursuant to Gardena Municipal Code Chapter 15.04, *General Building Provisions*, the City has adopted the 2019 California Building Standards Code (CBSC), subject to certain amendments and changes, including amendments specific to seismic conditions. The Project would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code, which includes design requirements to mitigate the effects of potential hazards associated with seismic ground shaking. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the Geotechnical Evaluation's recommendations. Thus, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with strong seismic ground shaking at the Project site would be reduced to a less than significant level.

**Mitigation Measures:** No mitigation measures are required.

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

**Less Than Significant Impact.** Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. Engineering research of soil liquefaction potential indicates that generally three basic factors must exist concurrently in order for liquefaction to occur. These factors include:

- A source of ground shaking, such as an earthquake, capable of generating soil mass distortions.
- A relatively loose silty and/or sandy soil.
- A relative shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that will allow positive pore pressure generation.

According to the Geotechnical Evaluation, the site is not located in an area mapped as a potential liquefaction zone. However, due to the relatively shallow depths to groundwater at the Project site, an evaluation was conducted for the liquefaction potential of the subsurface soils at the Project site. The liquefaction analysis indicates that scattered layers of granular soil deposits occurring between depths of approximately 20 and 50 feet may be susceptible to liquefaction during the design seismic event. Further, the Project site may be subject to liquefaction-induced settlement. The amount of soil settlement during a strong seismic event depends on the thickness of the liquefiable layers and the density and/or consistency of the soils. The Geotechnical Evaluation estimates dynamic differential settlement to be about 0.15 inch or less over a horizontal distance of about 40 feet. Due to the relatively small magnitude of liquefaction-induced ground settlement estimated at the Project site, the Geotechnical Evaluation concluded liquefaction is not considered to be a design concern. Impacts would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

***4) Landslides?***

**No Impact.** Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the Geologic Evaluation, there are no mapped landslides on site or in the vicinity and the site is not mapped a shaving the potential for seismically induced landslides. Based on this information and the location of the Project site, landslides are not considered to be a potential hazard.

***Mitigation Measures:*** No mitigation measures are required.

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

**Less Than Significant Impact.** The Project site and surrounding area are relatively flat. The site is generally underlain by artificial fill and alluvial soils. The fill materials generally consist of moist, firm to very stiff, lean clay with sand, and medium dense, clayey sand and silty sand. The alluvium generally consists of moist to wet, firm to hard, lean clay with sand, and loose to very dense, sandy silt, clayey sand, and silty sand.

Grading and earthwork activities associated with Project construction would expose soils to potential short-term erosion by wind and water. Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*, requires the reduction of pollutants being discharged to the waters of the U.S. through the elimination of non-stormwater discharges to the municipal stormwater system; elimination of the discharge of pollutants into the municipal storm drain system; reduction of pollutants in stormwater discharges to the maximum extent practicable; and protection and enhancement of the quality of the waters of the U.S. consistent with the provisions of the Clean Water Act. Gardena Municipal Code Section 8.70.110, *Pollutant Source Reduction*, requires construction projects that disturb one or more acres of soil by grading, clearing, and/or excavating or other activities to obtain a general construction activity stormwater permit (GCAWSP) from the State Water Resources Control Board prior to issuance of a grading permit. Construction activities would be required to comply with the erosion and siltation control measures of the GCAWSP, reducing potential impacts associated with soil erosion or the loss of topsoil during construction activities to a less than significant level.

Development of the Project would increase the amount of pervious area when compared to existing conditions associated with increased landscaped areas; refer to Section 4.10, Hydrology and Water Quality. The Project proposes catch basins and underground stormwater system that would capture runoff from the northern portion of the Project site and carry the runoff into an underground stormwater treatment and detention system that would ultimately outfall to a tie-in with an existing stormwater stub. Runoff from the southern portion of the site would sheet flow into proposed concrete valley gutters, which will carry the runoff to the proposed catch basins. The runoff would ultimately outfall in the existing public curb and gutter along Rosecrans Avenue via a sump pump. Additionally, the Project would be required to implement BMPs in accordance with the Project's Low Impact Development Plan (refer to Section 4.10), including common area landscape management, which would ensure landscaped areas would be maintained and properly irrigated to reduce the amount of potential soil erosion or the loss of top soil. Following compliance with the established regulatory framework identified in the Gardena Municipal Code regarding stormwater and runoff pollution control and implementation of the Project's

Low Impact Development Plan, potential impacts associated with soil erosion and the loss of topsoil would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

***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?***

**Less Than Significant Impact.** Refer to Responses 4.7(a)(3) and 4.7(a)(4) regarding the potential for liquefaction and landslides, respectively. Due to the low potential for liquefaction, the potential for lateral spreading to occur at the Project site is also considered low.

According to the Geotechnical Evaluation, in order to provide suitable support and reduce the potential for settlement of the proposed improvements, the areas beneath the new buildings, pavements subject to vehicle traffic, and sidewalks/hardscapes would need to be overexcavated and replaced with engineered fill and compacted. The Geotechnical Evaluation includes specific recommendations based on the results of the subsurface evaluation and laboratory testing, review of referenced geologic materials, and geotechnical analysis. These recommendations address earthwork, seismic design parameters, foundations, lateral earth pressures, underground utilities, sidewalk and hardscapes, preliminary pavement design, corrosivity, concrete placement, and drainage, among other factors.

The Project would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the Geotechnical Investigation's recommendations. Thus, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with a geologic unit or soil that is unstable or would become unstable at the Project site would be reduced to a less than significant impact.

**Mitigation Measures:** No mitigation measures are required.

***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?***

**Less Than Significant Impact.** Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result. The Geotechnical Evaluation identified the site as generally underlain by artificial fill and alluvial soils. The fill materials generally consist of moist, firm to very stiff, lean clay with sand, and medium dense, clayey sand and silty sand. The alluvium generally consists of moist to wet, firm to hard, lean clay with sand, and loose to very dense, sandy silt, clayey sand, and silty sand. While sandy soils are generally not susceptible to expansion, the potential exists that layers of expansive clay could be present at the foundation elevation.

According to the Geotechnical Evaluation, the areas beneath the new buildings, pavements subject to vehicle traffic, and sidewalks/hardscapes would need to be overexcavated and replaced with engineered fill and compacted. The Geotechnical Evaluation includes specific recommendations based on the results of the subsurface evaluation and laboratory testing, review of referenced geologic materials, and geotechnical analysis. These recommendations address earthwork, seismic design parameters, foundations, lateral earth pressures, underground utilities, sidewalk and hardscapes, preliminary pavement design, corrosivity, concrete placement, and drainage, among other factors.

The Project would be required to comply with all applicable regulations in the most recent CBSC as amended by the Gardena Municipal Code. The Gardena Building Services Division would review construction plans for compliance with the CBSC and Gardena Municipal Code, as well as the Geotechnical Investigation's recommendations. Thus, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's construction plan review process, would ensure potential impacts associated with expansive soils at the Project site would be reduced to a less than significant impact.

**Mitigation Measures:** No mitigation measures are required.

***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.** The Project would be served by the existing sewer system and would not involve the use of septic tanks or alternative wastewater disposal systems.

**Mitigation Measures:** No mitigation measures are required.

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

**Less Than Significant Impact with Mitigation Incorporated.** Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important.

As part of the Cultural Resources Assessment, a records search of the Project area was obtained from the Natural History Museum of Los Angeles County. Additional records from the from the University of California Museum of Paleontology database, the PaleoBiology Database, and print sources were also searched for fossil records. No recorded paleontological localities producing vertebrate fossils were found within 1.0-mile of the Project area. Six localities are known from Pleistocene deposits between 1.5 and 3.0 miles and another 15 localities were found between 3.0 and 10.0 miles from the Project site. Extinct megafauna from these sites include ground sloth (†*Paramylodon* sp.), mastodon (†*Mammut* sp.) mammoth (†*Mammuthus* sp.), dire wolf (†*Canis dirus*), horse (†*Equus* sp.), two types of pronghorn antelope (†*Capromeryx* sp., †*Breameryx* sp.), camel (†Camelidae), and bison (†*Bison* sp.; Table 2). All of the fossils were a minimum of five feet deep in deposits mapped as late Pleistocene at the surface, while

sediments with a Holocene component produced fossils starting at 11 feet deep. An intensive pedestrian survey for paleontological resources was not conducted as the Project site is almost completely developed, landscaped or hardscaped.

A multilevel ranking system was developed by professional resource managers within the Bureau of Land Management (BLM) as a practical tool to assess the sensitivity of sediments for fossils. The Potential Fossil Yield Classification (PFYC) system has a multi-level scale based on demonstrated yield of fossils. The PFYC system provides additional guidance regarding assessment and management for different fossil yield rankings. Fossil resources occur in geologic units (e.g., formations or members). The probability for finding significant fossils in a project area can be broadly predicted from previous records of fossils recovered from the geologic units present in and/or adjacent to the study area. The geological setting and the number of known fossil localities help determine the paleontological sensitivity according to PFYC criteria.

Using the PFYC system, geologic units are classified according to the relative abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts within the known extent of the geological unit. Although significant localities may occasionally occur in a geologic unit, a few widely scattered important fossils or localities do not necessarily indicate a higher PFYC value; instead, the relative abundance of localities is intended to be the major determinant for the value assignment.

The Project is mapped as late Pleistocene to Holocene young alluvium and the Geotechnical Evaluation revealed that artificial fill was present to a depth of between 2 and 13 feet in the three borings across the Project site. A records search revealed that all of the fossils previously recovered within a 10-mile radius were a minimum of 5 feet deep in deposits mapped as late Pleistocene at the surface. All artificial fill is assigned a very low potential for fossils (PFYC 1) due to the lack of fossils in these deposits. Project sediments less than 5 feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. Sediments more than 8 feet below the modern surface are assigned a moderate potential for fossils (PFYC 3) due to similar deposits producing fossils at that depth near to the study area.

The Project proposes excavation depths of four feet for the majority of grading. Based upon fossils found in similar sediments nearby, paleontological monitoring is recommended for the excavations into native sediments more than 5 feet deep. Should planned work extend to more than 5 feet below the historic surface, a Worker Environmental Awareness Program (WEAP) training prepared by a qualified vertebrate paleontologist is recommended for construction personnel who will be engaged in ground disturbing activities. Augering, potholing, pile driving, and similar activities regardless of depth, have a low potential to produce fossils meeting significance criteria because any fossils brought up by the auger during drilling will not have information about formation, depth or context. If unanticipated fossil discoveries are made, all work must halt within 25 feet until a qualified paleontologist can evaluate the find. Work may resume immediately outside of the 25 foot radius.

Based on fossils found in similar sediments nearby, there is the potential for Project excavation activities greater than five feet deep into native sediments to encounter paleontological resources. Thus, Mitigation Measure GEO-1 would require a paleontological monitor to be at the site during ground disturbances occurring greater than 5.0 feet below the historic surface elevation in native sediments. Additionally, Condition of Approval (COA) GEO-1 would require Worker Awareness and Environmental Program (WEAP)

Training for construction personnel involved in ground disturbing activities. COA GEO-2 details the appropriate steps in the event paleontological resources are encountered during ground disturbing activities, including the requirement for all work within a 25-foot radius of the find to be halted and a professional vertebrate paleontologist be contacted to evaluate the find. The significance of the find would be evaluated and if determined to be significant, the paleontologist would determine any additional work, such as data recovery excavation, that would be warranted, prior to construction activities resuming. With implementation of Mitigation Measure GEO-1 and COA GEO-1 and GEO-2, potential impacts to paleontological resources would be reduced to a less than significant level.

COA GEO-1: Prior to commencement of ground-disturbing activities, a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall develop Worker Awareness and Environmental Program (WEAP) Training for construction personnel. This training shall be presented to construction personnel and include what fossil remains may be found within the Project area and policies and procedures that must be followed in case of a discovery. Verification of the WEAP Training shall be provided to the Gardena Community Development Department.

COA GEO-2: If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt and a professional vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the State CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist and full-time paleontological monitoring shall occur for the remainder of ground disturbance for the project.

**Mitigation Measures:**

GEO-1: Paleontological resources monitoring by a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be required during ground disturbances greater than 5.0 feet below the historic surface elevation in native sediments. Paleontological monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls. In the event that a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Monitoring efforts can be reduced or eliminated at the discretion of the project paleontologist after 30 percent of earthwork is completed.

## 4.8 Greenhouse Gas Emissions

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | X | |

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring GHGs include water vapor ($H_2O$), carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and ozone ($O_3$). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct GHGs, including $CO_2$, $CH_4$, and $N_2O$, occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2011, concentrations of these three GHGs have increased globally by 40, 150, and 20 percent, respectively (IPCC, 2013).

Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide ($CO_2$), methane ($CH_4$), ozone ($O_3$), water vapor, nitrous oxide ($N_2O$), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. In California, the transportation sector is the largest emitter of GHGs, followed by the industrial sector (California Energy Commission, 2020).

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced 424 million gross metric tons of carbon dioxide equivalents ($MMTCO_2e$) in 2019 (California Energy Commission, 2019). Given that the U.S. EPA estimates that worldwide emissions from human activities totaled nearly 46 billion gross metric tons of carbon dioxide equivalents ($BMTCO_2e$) in 2010, California's incremental contribution to global GHGs is approximately 2 percent (U.S. EPA, 2014).

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only $CO_2$ were being emitted.

Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2014, accounting for 41 percent of total GHG emissions in the state. This category was followed by the industrial sector (24%), the electricity generation sector (including both in-State and out of-State sources) (15%) and the agriculture sector (8%) (California Energy Commission, 2016).

**REGULATORY FRAMEWORK**

**U.S. Environmental Protection Agency Endangerment Finding**

The U.S. Environmental Protection Agency's (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in Massachusetts v. EPA (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs ($CO_2$, $CH_4$, $N_2O$, hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [$SF_6$]) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Clean Air Act and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

**Assembly Bill 32 (California Global Warming Solutions Act of 2006)**

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500-38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to Assembly Bill (AB) 1493 (Pavley Bill) should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

**Senate Bill 375**

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities' strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, is required to provide each affected region with GHG reduction targets emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets are to be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is

also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding.

**Executive Order S-3-05**

Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

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

The Executive Order directed the California Environmental Protection Agency (Cal/EPA) Secretary to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary is required to submit biannual reports to the Governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with Executive Order S-3-05, the Cal/EPA Secretary created the California Climate Action Team, made up of members from various State agencies and commissions. The Climate Action Team released its first report in March 2006, which proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

**Title 24, Part 6**

The California Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as "Title 24" were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Part 6 of Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards took effect on January 1, 2020.

**Title 24, Part 11**

The California Green Building Standards Code (CCR Title 24, Part 11), commonly referred to as CALGreen, is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in five green building topical areas. The most recent update to the CALGreen Code went into effect on January 1, 2020.

**Senate Bill 3**

Signed into law on September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

**CARB Scoping Plan**

On December 11, 2008, CARB adopted its Climate Change Scoping Plan (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California will implement to reduce CO2eq emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions levels of 596 million $MTCO_2e$ under a business as usual (BAU) scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, and requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, industrial, commercial, and residential). CARB used three-year average emissions, by sector, from 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce projected 2020 BAU emissions to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The 2014 Scoping Plan summarizes recent science related to climate change, including anticipated impacts to California and the levels of GHG reduction necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The 2014 Scoping Plan also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." The 2014 Scoping Plan did not establish or propose any specific post-2020 goals, but identified such goals adopted by other governments or recommended by various scientific and policy organizations.

In December 2017, CARB approved the California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan). This update focused on implementation of a 40-percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the 2017 Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy:

- More Clean Cars and Trucks: The 2017 Scoping Plan establishes far-reaching programs to incentivize the sale of zero-emission vehicles, drive the deployment of zero-emission trucks, and shift to a cleaner system of handling freight Statewide.
- Increased Renewable Energy: California's electric utilities are ahead of schedule in meeting the requirement that 33 percent of electricity come from renewable sources by 2020. The 2017 Scoping Plan guides utility providers to 50 percent renewables, as required under SB 350.
- Slashing Super-Pollutants: The 2017 Scoping Plan calls for a significant cut in super-pollutants, such as $CH_4$ and HFC refrigerants, which are responsible for as much as 40 percent of global warming.
- Cleaner Industry and Electricity: California's renewed cap-and-trade program extends the declining cap on emissions from utilities and industries and the carbon allowance auctions. The

auctions will continue to fund investments in clean energy and efficiency, particularly in disadvantaged communities.

- Cleaner Fuels: The Low Carbon Fuel Standard will drive further development of cleaner, renewable transportation fuels to replace fossil fuels.
- Smart Community Planning: Local communities will continue developing plans which will further link transportation and housing policies to create sustainable communities.
- Improved Agriculture and Forests: The 2017 Scoping Plan also outlines innovative programs to account for and reduce emissions from agriculture, as well as forests and other natural lands.

**City of Gardena Climate Action Plan**

The City of Gardena, along with the South Bay Cities Council of Governments (SBCCOG), developed a Climate Action Plan (CAP) to reduce GHG emissions within the City. The City of Gardena CAP (December 2017) serves as a guide for action by setting GHG emission reduction goals and establishing strategies and policy to achieve desired outcomes over the next 20 years. The CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2005 levels by 2020 and 49 percent of 2005 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including transportation, land use, energy efficiency, solid waste, urban greening, and energy generation and storage. Reduction measures include accelerating the market for electric vehicles, encouraging alternative transportation choices, increasing energy efficiency in existing buildings, reducing energy consumption, increasing solid waste diversion, and supporting energy generation in the community.

The implementation of CAP emissions reduction measures would achieve the reduction target for 2020 and 2035. In the coming years, as the CAP is reviewed and revised, measures will be implemented to achieve the 2035 target. The CAP includes monitoring and a target for tracking progress with re-inventorying at later dates.

A critical aspect of having a CAP that fits the criteria within CEQA Guidelines Section 15183.5 is to have reduction targets that align with Statewide goals. The CAP's 2020 and 2035 reduction targets (i.e., below baseline emission levels) parallel the State's commitment to reducing GHG emissions under AB 32. However, it proceeds even further by identifying targets that are specific to the City's geographic location as well as activity types and their associated sources. Therefore, because the CAP's 2020 and 2035 targets align with the Statewide goal for 2020 (i.e., achieving 1990 levels), the CAP is consistent with AB 32. Through 2035, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5.

*Thresholds of Significance*

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or

suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064(h)(3)).[5,6] A project's incremental contribution to a cumulative impact can be found not to be cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.

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

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

***Less Than Significant Impact.*** The proposed Project would generate GHGs during the construction and operational phases of the Project. The Project's primary source of construction-related GHGs would result from emissions of $CO_2$ associated with Project construction and worker vehicle trips; refer to Table 4.8-1, *Construction GHG Emissions (Metric Tons/Year)*. Additionally, the Project would require limited grading, and would also include site preparation, building construction, and architectural coating phases.

**Table 4.8-1**
**Construction GHG Emissions (Metric Tons/Year)**

| Year | Bio-$CO_2$ | NBio-$CO_2$ | Total $CO_2$ | $CH_4$ | $N_2O$ | $CO_2e$ |
|---|---|---|---|---|---|---|
| 2022 | 0 | 476.1 | 476.1 | 0.1 | <0.1 | 482.5 |
| 2023 | 0 | 150.0 | 150.0 | <0.1 | 0 | 151.6 |
| **Maximum** | **0** | **476.1** | **476.1** | **0.1** | **<0.1** | **482.5** |

Source: CalEEMod version 2020.4.0

Note: Unmitigated and mitigated emissions results are equivalent; therefore, Table 4.8-1 represents both unmitigated and mitigated results.

As shown in Table 4.8-1, Project construction-related activities would generate a maximum of approximately 483 $MTCO_2e$ of GHG emissions in a single year. Construction GHG emissions are typically summed and amortized over the Project's lifetime (assumed to be 30 years), then added to the

[5] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16, December 2009, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf.
[6] State of California Governor's Office of Planning and Research, *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency*, April 13, 2009, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf

operational emissions.[7] The amortized Project emissions would be approximately 16 $MTCO_2e$ per year. Once construction is complete, the generation of construction-related GHG emissions would cease.

The operational phase of the Project would generate GHGs primarily from the Project's operational vehicle trips and building energy (electricity and natural gas) usage; refer to Table 4.8-2, *Operational GHG Emissions 2021 (Metric Tons/Year)*. Other sources of GHG emissions would be minimal.

**Table 4.8-2**
**Operational GHG Emissions 2021 (Metric Tons/Year)**

| Category | Bio-$CO_2$ | NBio-$CO_2$ | Total $CO_2$ | $CH_4$ | $N_2O$ | $CO_2e$ |
|---|---|---|---|---|---|---|
| Area | 0 | <0.1 | <0.1 | <0.1 | 0 | <0.1 |
| Energy | 0 | 185.7 | 185.7 | <0.1 | <0.1 | 186.6 |
| Mobile | 0 | 174.3 | 174.3 | <0.1 | <0.1 | 176.7 |
| Waste | 44.0 | 0 | 44.0 | 2.6 | 0 | 109.0 |
| Water | 13.3 | 98.3 | 111.6 | 1.4 | <0.1 | 156.0 |
| **Total** | **57.4** | **458.3** | **515.6** | **4.0** | **<0.1** | **628.5** |

Source: CalEEMod version 2020.4.0

Note: Unmitigated and mitigated emissions results are equivalent; therefore, Table 4.8-1 represents both unmitigated and mitigated results.

As shown in Table 4.8-2, Project operational GHG emissions would total approximately 629 $MTCO_2e$ annually, and combined with construction-related GHG emissions, would total approximately 645 $MTCO_2e$ annually. Therefore, the proposed Project would not exceed the SCAQMD's proposed GHG threshold of 3,000 MTCO2e per year.[8] In addition, with continued implementation of various Statewide measures, the Project's operational energy and mobile source emissions would continue to decline in the future.

[7] The Project lifetime is based on SCAQMD's standard 30-year assumption (South Coast Air Quality Management District, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).
[8] On September 28, 2010, air quality experts serving on the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 metric tons of $CO_2e$ annually. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments. The numeric bright line and efficiency-based thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a proposed project are significant.

**Consistency with Applicable GHG Plans, Policies, or Regulations**

**Gardena Climate Action Plan Consistency**

As stated, the CAP's 2020 and 2035 reduction targets (i.e., below baseline emission levels) parallel the State's commitment to reducing GHG emissions under AB 32. Through 2035, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5. In the coming years, as the CAP is reviewed and revised, measures will be implemented to achieve the 2035 target. The CAP includes monitoring and a target for tracking progress with re-inventorying at later dates. As demonstrated in Response 4.6(b), the Project would be consistent with the City's CAP, refer to Section 4.6, Energy.

**2017 Scoping Plan Consistency**

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the California Legislature as AB 32. In 2008, CARB approved a Scoping Plan as required by AB 32. The Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013 Scoping Plan). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted subsequently as required to achieve Statewide GHG emissions targets.

Table 4.8-3, *Project Consistency with the 2017 Scoping Plan*, summarizes the Project's consistency with applicable policies and measures of the 2017 Scoping Plan. As indicated in Table 4.8-3, the Project would not conflict with any of the provisions of the 2017 Scoping Plan and would support four of the action categories through energy efficiency, water conservation, recycling, and landscaping.

**Table 4.8-3**
**Project Consistency with the 2017 Scoping Plan**

| Sector/Source | Category/Description | Consistency Analysis |
|---|---|---|
| **Area** | | |
| **SCAQMD Rule 445 (Wood Burning Devices)** | Restricts the installation of wood-burning devices in new development. | Mandatory Compliance. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.[1] The Project would not include hearths (woodstove and fireplaces) as mandated by this rule. |
| **Energy** | | |
| **California Renewables Portfolio Standard, Senate Bill 350 (SB 350) and Senate Bill 100 (SB 100)** | Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. SB 100 requires 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. | No Conflict. The Project would utilize electricity provided by Southern California Edison (SCE), which is required to meet the 2020, 2030, 2045, and 2050 performance standards. In 2018, 31 percent of SCE's electricity came from renewable resources.[2] By 2030 SCE plans to achieve 80 percent carbon-free energy.[3] |
| **California Code of Regulations, Title 24, Building Standards Code** | Requires compliance with energy efficiency standards for residential and nonresidential buildings. | Mandatory Compliance. The Project is required to meet the applicable requirements of the 2019 Title 24 Building Energy Efficiency Standards (see discussion under CALGreen Code requirements below), or whatever standards are in effect at the time of building permit application. |

**Table 4.8-3 (continued)**
**Project Consistency with the 2017 Scoping Plan**

| Sector/Source | Category/Description | Consistency Analysis |
|---|---|---|
| **California Green Building Standards (CALGreen) Code Requirements** | All bathroom exhaust fans are required to be ENERGY STAR compliant. | Mandatory Compliance. The Project construction plans are required to demonstrate that energy efficiency appliances, including bathroom exhaust fans, and equipment are ENERGY STAR compliant. |
| | HVAC system designs are required to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards. | Mandatory Compliance. The Project construction plans are required to demonstrate that the HVAC system meets the ASHRAE standards. |
| | Air filtration systems are required to meet a minimum efficiency reporting value (MERV) 8 or higher. | Mandatory Compliance. The Project is required to install air filtration systems (MERV 8 or higher) as part of its compliance with 2019 Title 24 Section 401.2, Filters, or whatever standards are in effect at the time of building permit application. |
| | Refrigerants used in newly installed HVAC systems shall not contain any chlorofluorocarbons. | Mandatory Compliance. The Project must meet this requirement as part of its compliance with the CALGreen Code. |
| | Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces is required for such vehicles. | Mandatory Compliance. The Project would meet this requirement as part of its compliance the CALGreen Code. |

**Table 4.8-3 (continued)**
**Project Consistency with the 2017 Scoping Plan**

| Sector/Source | Category/Description | Consistency Analysis |
|---|---|---|
| **Mobile Sources** | | |
| **Mobile Source Strategy (Cleaner Technology and Fuels)** | Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems, and reduction of vehicle miles traveled. | Consistent. The Project would be consistent with this strategy by supporting the use of zero-emission and low-emission vehicles; refer to CALGreen Code discussion above. |
| **Senate Bill (SB) 375** | SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. | Consistent. As demonstrated in the 2020-2045 RTP/SCS Consistency discussion below, the Project would comply with the 2020-2045 RTP/SCS and therefore, the Project would be consistent with SB 375. |
| **Water** | | |
| **CCR, Title 24, Building Standards Code** | Title 24 includes water efficiency requirements for new residential and non- residential uses. | Mandatory Compliance. Refer to the discussion under 2019 Title 24 Building Standards Code and CALGreen Code, above. |
| **Water Conservation Act of 2009 (Senate Bill X7-7)** | The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment. | Consistent. Refer to the discussion under 2019 Title 24 Building Standards Code and CALGreen Code, above. Also, refer to Section 4.10, Hydrology and Water Quality. |

**Table 4.8-3 (continued)**
**Project Consistency with the 2017 Scoping Plan**

| Sector/Source | Category/Description | Consistency Analysis |
|---|---|---|
| **Solid Waste** | | |
| **California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341** | The IWMA mandates that State agencies develop and implement an integrated waste management plan which outlines the steps to divert at least 50 percent of solid waste from disposal facilities. AB 341 directs the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020. | Mandatory Compliance. The Project would be required to comply with AB 341. This would reduce the overall amount of solid waste disposed of at landfills. The decrease in solid waste would in return decrease the amount of methane released from decomposing solid waste. |

Notes:
1. California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, Figure 4: California 2013 Anthropogenic Black Carbon Emission Sources, November 2017.
2. California Energy Commission, *2018 Power Content Label Southern California Edison,* https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Southern_California_Edison.pdf, accessed June 24, 2020.
3. Southern California Edison, *The Clean Power and Electrification Pathway,* https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20187/g17-pathway-to-2030-white-paper.pdf, accessed June 24, 2020.
4. California Energy Commission, *2013 California Energy Efficiency Potential and Goals Study*, Appendix Volume I, August 15, 2013.

**2020-2045 RTP/SCS Consistency**

SCAG recently adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal). At the regional level, Connect SoCal is adopted for the purpose of reducing GHGs resulting from vehicular emissions by passenger vehicles and light duty trucks. In order to assess the Project's consistency with Connect SoCal, the Project's land use assumptions are reviewed for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as Connect SoCal, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project proposes to remove the existing U-Haul facility and unoccupied restaurant building to develop a new, modern U-Haul storage facility, truck and trailer sharing, and retail sales office. The Project site is designated General Commercial with a Mixed Use Overlay (MUO). The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other

commercial uses oriented to the traveling public. The maximum permitted floor area ratio (FAR) is 0.5 in general and up to 2.75 for specific uses when allowed by the Zoning Code. The MUO land use designation permits residential development on selected areas designated for Commercial and Industrial land uses. The purpose of this land use designation is to allow greater flexibility of development alternatives, especially attractive higher density residential development in appropriate areas that are experiencing both physical and economic blight.

The Project would be consistent with the General Plan land use designation for the Project site and would not result in significant population or employment growth that would exceed SCAG's growth projections. Currently, there are eight to nine part-time employees for the retail store and eight corporate employees. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated. At completion, the facility would be staffed with between 10 and 15 employees, both full-time and part-time, and eight corporate employees during the sales office hours. Thus, the Project would not cause SCAG growth forecasts to be exceeded and would not conflict with any policies adopted for the purpose of reducing the emissions of greenhouse gases. Impacts are considered to be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

This page intentionally left blank.

## 4.9 Hazards and Hazardous Materials

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | X | |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | | X | |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | | X |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | | | | X |
| 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? | | | X | |
| f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | X | |
| g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | X |

***a) Create a significant hazard to the public or the environment through the 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 materials into the environment?***

**Less Than Significant Impact.** Generally, the exposure of persons to hazardous materials could occur in the following manners: 1) improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development, particularly by untrained personnel; 2) an accident during transport; 3) environmentally unsound disposal methods; or 4) fire, explosion or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Construction activities associated with the proposed Project may involve the routine transport, use, or disposal of hazardous materials, 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. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law.

The Project proposes to remove the existing U-Haul facility and unoccupied restaurant building to develop a new, modern U-Haul storage facility, truck and trailer sharing, and retail sales office. Use of the site would be generally consistent with the uses currently conducted on-site. Proposed operations would not involve the use of hazardous materials creating a significant hazard to the public or the environment. Minor cleaning products and the occasional use of pesticides and herbicides for landscape maintenance would be used; however, the use of these materials already occurs within the site associated with the existing use. A propane tank is currently located within the Project site as part of the existing U-Haul commercial operations. The propane tank would be protected in place during construction activities. Upon Project completion, selling of propane would continue to occur as part of U-Haul's commercial operations, similar to existing conditions. Any transport, storage, use or disposal of hazardous materials would be subject to applicable State and federal laws, minimizing the potential for upset and accident conditions to occur within the site. The proposed Project would not introduce new uses that would involve new or increased use of hazardous materials within the site and impacts would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

***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.** The Project is located just over 0.25-mile north of Junipero Serra High School and approximately 0.5-mile north of Chapman Elementary School and 0.5-mile south of Purche Avenue Elementary School. The Project proposes to remove the existing U-Haul facility and unoccupied restaurant and develop a new, modern U-Haul Moving and Storage facility, which would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. Therefore, no impact is anticipated and no mitigation is required.

***Mitigation Measures:*** No mitigation measures are required.

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

**No Impact.** Government Code Section 65962.5, commonly referred to as the "Cortese List", requires the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB) to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste. The Project site is not included on any of the data resources identified as meeting the Cortese List requirements.[9] Therefore, the Project site has not been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and therefore would not create a significant hazard to the public or the environment.

***Mitigation Measures:*** No mitigation measures are required.

***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?***

**Less Than Significant Impact.** Hawthorne Municipal Airport, also known as Jack Northrop Field, is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. The airport is located approximately 0.5-mile west of the northwestern-most portion of the City of Gardena and approximately 1.5 miles from the Project site. The City of Hawthorne General Plan Noise Element provides noise contours (Figures 5A and 5B) for the City, which include the airport. The noise contours associated with the airport do not extend beyond the municipal boundaries of the City of Hawthorne. Thus, development of an expanded U-Haul facility within the City of Gardena would not be exposed to excessive noise associated with the Hawthorne Municipal Airport.

Due to the proximity of the airport to the City, development within the City is subject to potential hazards associated with airport operations. However, self-storage facilities are currently allowed within the C-4 zone with approval of a CUP. A U-Haul facility currently operates at the Project site. The expansion of the facility and introduction of self-storage would not introduce a new use that would result in a safety hazard for people working in the area associated with the airport or Project site. Impacts would be less than significant.

[9] California Department of Toxic Substances Control, EnviroStor, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Sacramento&tour=True, accessed January 27, 2022.

**Mitigation Measures:** No mitigation measures are required.

***f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

**Less Than Significant Impact.** The City of Gardena Emergency Operations Plan (EOP) addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The City's EOP establishes the emergency organization, assigns tasks, and specifies policies and general procedures. The EOP is designed to include Gardena in the overall California Standardized Emergency Management System (SEMS), which provides a framework for coordinating multi-agency responses in the case of emergencies. In the event of an emergency, first responders would coordinate any emergency response or emergency evacuation activities within the City.

Van Ness and Rosecrans Avenues provide direct access to the Project site and would serve as a primary evacuation and emergency access routes within the area. Construction activities are not anticipated to result in significant traffic or queuing along Rosecrans or Van Ness Avenues or other roadways within the area that could potentially impede emergency vehicles or impair any emergency evacuation plan. Lane closures immediately adjacent to the Project site would occur during construction activities associated with utility trenching. These closures would be temporary and vehicle access would be controlled by construction personnel. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road Closure or Interference with Highway Use*. However, this would be temporary and emergency access to the Project site and surrounding area would be required to be maintained along Van Ness and Rosecrans Avenues at all times. Additionally, all construction staging would occur within the boundaries of the Project site and would not interfere with circulation along Rosecrans and Van Ness Avenues, or any nearby roadways.

The Project does not propose any modifications to Van Ness or Rosecrans Avenues. The Project would involve construction of an additional 30-foot-wide driveway within the northern portion of the site, south of the parking spaces used by the post office. The Project proposes to remove two of the driveways on Rosecrans Avenue and to reconstruct the curb/gutter and sidewalk; the existing driveway at the southeast corner of the Project site would be maintained. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. The Los Angeles County Fire Department (LACFD) has reviewed the Project for access requirements, minimum roadway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the Project site. The Project would be required to comply with all applicable Building and Fire Code requirements and would submit construction plans to the Fire Department's Engineering Building Plan Check Unit for review and approval prior to issuance of any building permit. Approval by the Fire Department would ensure that Project construction and operation would not impair implementation of or physically interfere with the City's EOP or emergency evacuation plan and impacts would be less than significant.

**Mitigation Measures:** No mitigation measures are required.

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

**No Impact.** The Project site is located within an urbanized area. The Project site and surrounding area are not within or located adjacent to any wildlands or areas identified as being at risk of wildland fires. Therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

**Mitigation Measures:** No mitigation measures are required.

This page intentionally left blank.

## 4.10 Hydrology and Water Quality

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | | | X | |
| b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | | | X | |
| 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: | | | | |
| 1) Result in substantial erosion or siltation on- or off-site? | | | X | |
| 2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? | | | X | |
| 3) 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? | | | X | |
| 4) Impede or redirect flood flows? | | | X | |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | X | |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | X | |

This section is based on the *U-Haul Gardena – Hydrology Memorandum* (Hydrology Memo) prepared by Kimley-Horn, dated March 10, 2022 and *Low Impact Development Plan* (LID Plan) prepared by Kimley-Horn, dated August 25, 2021, Revised March 10, 2022, included in their entirety as Appendix E, Hydrology Memorandum and Low Impact Development Plan and the *Geotechnical Evaluation New U-Haul Facility 14206 Van Ness Avenue, Gardena, California* (Geotechnical Evaluation), prepared by Ninyo & Moore, dated December 15, 2021 and included in its entirety as Appendix D, Geotechnical Evaluation.

***a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

***Less Than Significant Impact.***

**Short-Term Construction**

Short-term construction activities associated with the proposed Project could impact water quality. Sources of potential construction-related storm water pollution include handling, storage, and disposal of construction materials containing pollutants; maintenance and operation of construction equipment; and site preparation activities, such as excavation, grading and trenching. These sources, if not controlled, can generate soil erosion and on- and off-site transport via storm run-off or mechanical equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other vehicle-related fluids on the Project site are also common sources of storm water pollution and soil contamination. Implementation of the proposed Project has the potential to produce typical pollutants such as nutrients, heavy metals, pesticides and herbicides, toxic chemicals related to construction and cleaning, waste materials including wash water, paints, wood, paper, concrete, food containers, and sanitary wastes, fuel, and lubricants. Generally, standard safety precautions for handling and storing construction materials can adequately reduce the potential pollution of storm water by these materials. These types of standard procedures can be extended to non-hazardous storm water pollutants such as sawdust, concrete washout, and other wastes.

Grading activities would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Two general strategies are recommended to prevent soil materials from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed, and secondly, the Project site should be secured to control off-site transport of pollutants. In order to reduce the amount of on-site exposed soil, grading would be limited to the extent feasible, and any graded areas would be protected against erosion once they are brought to final grade. Furthermore, the proposed Project would be required to comply with the Construction General National Pollutant Discharge Elimination System (NPDES) Permit and the City of Gardena Municipal Code.

Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. The Project would disturb approximately four acres and therefore would be subject to the General Permit. To obtain coverage under the General Permit, dischargers are required to file with the State Water Resources Control Board (SWRCB) the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation

of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized.

The Project would also be subject to Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*. Chapter 8.70 is intended to reduce the quality of pollutants being discharged to the waters of the United States through: the elimination of non-stormwater discharges to the municipal stormwater system; the elimination of discharge of pollutants into the municipal storm drain system; the reduction of pollutants in stormwater discharges to the maximum extent practicable; the protection and enhancement of the quality of the waters of the United States in a manner consistent with the provisions of the Clean Water Act. Section 8.70.110, *Pollutant Source Reduction*, states that no grading permit shall be issued to construction projects disturbing one or more acres of soil without obtaining a General Construction Activity Stormwater Permit (GCASP) from the SWRCB.

Compliance with the NPDES and Gardena Municipal Code requirements would ensure the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality, resulting in a less than significant impact.

**Long-Term Operations**

The City of Gardena discharges pollutants from its municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175 as amended by State Water Board Order WQ 2015-0075 (NPDES Permit No. CAS004001, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*.[10]

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to the Order include all development projects equal to 1.0 acre or greater of disturbed area. The Project involves approximately four acres of disturbed area and therefore would be subject to compliance with the Order. As stated, Gardena Municipal Code Chapter 8.70, *Stormwater and Runoff Pollution Control*, establishes the requirements to protect water quality. Section 8.70.110, *Pollutant Source Reduction*, requires new development and redevelopment projects subject to the MS4 permit, such as the proposed Project, to comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan

[10] State Water Resources Control Board, Phase I MS4 Permits, Region 4, County of Los Angeles and the Incorporated Cities Therein except the City of Long Beach – Order No. R4-2012-0175 as amended by WQ Order 2015-0075, https://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_i_municipal.html, accessed October 20, 2021.

(SUSMP). The SUSMP requires low impact development (LID) BMPs; source control BMPs and structural and nonstructural BMPs for specific types of uses. LID controls effectively reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that reduce runoff. Source control BMPs prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls are also required to address pollutant discharges from certain uses including but not limited to housing developments, parking lots, and new streets. The SUSMP is required to be submitted to the City for review and approval and incorporated into the Project plans.

A LID Plan has been prepared for the proposed Project (refer to Appendix E). The objectives of the LID Plan are to: determine the peak storm water runoff discharge rate; conserve natural and landscaped areas; minimize storm water pollutants of concern; protect slopes and channels; provide storm drain stenciling and signage; property design trash storage areas; provide proof of ongoing BMP maintenance; and design standards for structural or treatment control BMPs.

Under existing conditions, runoff within the northern portion of the existing site drains through several existing concrete valley gutters that flow into grate inlets that routes stormwater through an underground storm drain system that ultimately outfalls into a public storm drain main within Van Ness Avenue. Runoff within the southern portion of the existing site sheet flows into existing public curb and gutter systems along Van Ness and Rosecrans Avenues, where it ultimately outfalls via pump into a public storm drain system.

Under proposed conditions, the Project would provide an underground stormwater treatment and detention system. Runoff within the northern portion of the site would sheet flow into two proposed catch basins, where the proposed underground stormwater system would carry the runoff into an underground stormwater treatment, detention system, and sump pump and ultimately outfall through a proposed parkway drain into the public curb and gutter along Van Ness Avenue. Runoff within the southern portion of the site would sheet flow into proposed concrete valley gutters, which would carry runoff into proposed catch basins, where the proposed underground stormwater system would carry the runoff into underground stormwater treatment system, detention system, and sump pump and ultimately outfall through a proposed parkway drain into the public curb and gutter along Van Ness Avenue.

Stormwater infiltration has been determined to be infeasible due to subsurface soils conditions. As demonstrated in the Geotechnical Evaluation, clayey soils are located within the Project site and the infiltration rate of these soils is below what is feasible for design. As part of the final design, any potential infiltration and harvest and use BMPs would be determined and utilized to the extent feasible. Alternative compliance BMPs have been identified for use within the Project site. Specifically, an underground proprietary biotreatment system would be used to treat runoff from the Project site. Additionally, non-structural and structural source control BMPs would be implemented, including but not limited to, common area landscape management, housekeeping of loading docks, common area catch basin inspection, use of efficient irrigation systems and landscape design, water conservation, smart controllers, and source control, and design and construct trash and waste storage areas to reduce pollution introduction.

Compliance with NPDES and Gardena Municipal Code requirements, which include implementation of LID BMPs, would ensure that Project operations would not violate any water quality standards or waste

discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant in this regard.

***Mitigation Measures:*** No mitigation measures are required.

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

***Less Than Significant Impact.*** The City of Gardena, including the Project site, receives water from Golden State Water Company (GSWC). The City is located within GSWC's Southwest Customer Service Area, which serves approximately 55,000 customers.[11] The Southwest System receives its water supplies from adjudicated groundwater supplies, leased or purchased groundwater supplies, purchased water from Central Basin Municipal Water District and West Basin Municipal Water District, and recycled water.[12] Groundwater supplies constitute a major component of GSWC Southwest's water supply portfolio. GSWC Southwest overlies both the Central Basin and the West Coast Basin. GSWC Southwest uses adjudicated groundwater supplies from both basins for use in its service area.

Groundwater is supplied to the Southwest System by thirteen GSWC-owned wells in the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (Central Basin) and the West Coast Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (West Coast Basin), with a combined capacity of 13,400 gallons per minute (gpm).[13] According to the GSWC Southwest Service Area 2020 Urban Water Management Plan (2020 UWMP), groundwater pumping for the Southwest System in 2020 totaled 7,172 acre-feet per year (AFY), with 3,010 AFY from the Central Basin and 4,162 AFY from the West Coast Basin. Both the Central and West Coast Basins are adjudicated and are therefore subject to a maximum allowed pumping allocation for groundwater extraction across the entire Basins; refer to Response 4.10(e) regarding groundwater management.

In 2020, the Southwest area had a daily water use of 84 gallons per capita per day (GPCD), which was below the 2020 water use target of 121 GPCD. As discussed in Response 4.10(e), the Project is not anticipated to generate significant population growth within the City. Currently, there are eight to nine part-time employees for the retail store and eight corporate employees. At completion, the facility would be staffed with between ten and 15 employees, both full-time and part time, and eight corporate employees. Thus, the proposed Project would be within the population projections anticipated by the City and the 2020 UWMP. Further, the proposed Project's water demand is expected to remain largely unchanged from current conditions.

As stated, the Southwest area receives its water from imported water, groundwater, and recycled water. Thus, the Project would not rely entirely on groundwater supplies. According to the 2020 UWMP, GSWC maintains an allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Basin. The

[11]Golden State Water Company, *Southwest Service Area*, https://www.gswater.com/southwest, accessed October 20, 2021.
[12] Tully & Young, *Southwest Service Area 2020 Urban Water Management Plan*, July, 15, 2021.
[13] Ibid.

adjudicated basins would continue to be subject to the maximum allowed pumping allocation for groundwater extraction. Continued diligence by the pumpers is expected to ensure the reliability of the Central and West Coast Basins groundwater supplies. Therefore, the Project would not substantially deplete groundwater supplies.

The Project site currently contains 4.4 percent (7,804 square feet) of pervious area and 95.6 percent (169,131 square feet) of impervious area. In the proposed condition, the Project site would contain 12.6 percent (22,328 square feet) of pervious area and 87.4 percent (154,607 square feet) of impervious area associated with increased landscaping within the site when compared to existing conditions. Although the Project would increase the pervious area, groundwater recharge through infiltration is limited as soil parameters for the Project site do not allow for significant infiltration. Infiltration potential would be determined during final design and implemented to the extent feasible. However, the Project site does not currently allow for infiltration and groundwater recharge; thus, the proposed Project would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***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:***

***1) Result in substantial erosion or siltation on- or off-site?***

***2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***

***3) 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?***

***4) Impede or redirect flood flows?***

***Less Than Significant Impact.*** Refer to Response 4.10(a) regarding potential impacts involving erosion and water quality.

The Project site's existing drainage pattern is generally split into two areas: the northern portion of the site (approximately 0.82 acres) and the southern portion of the site (approximately 3.24 acres). Under existing conditions, runoff within the northern portion of the existing site drains through several existing concrete valley gutters that flow into grate inlets that routes stormwater through an underground storm drain system that ultimately outfalls into a public storm drain main within Van Ness Avenue. Runoff within the southern portion of the existing site sheet flows into existing public curb and gutter systems along Van Ness and Rosecrans Avenues, where it ultimately outfalls via pump into a public storm drain system. Ultimately, runoff from the Project site drains via engineered stormwater infrastructure within Van Ness and Rosecrans Avenues into the Dominguez Channel, where runoff outfalls into the Los Angeles Harbor.

According to the Hydrology Memo, post-development drainage patterns would remain the same as existing drainage patterns. In the proposed condition, the drainage pattern would continue to be split into two areas: the northern portion of the site (approximately 1.24 acres) and the southern portion of the site (approximately 2.84 acres) for water quality treatment purposes. The percent of impervious cover would be decreased in the proposed condition; therefore, peak flows from the Project site would not increase when compared to existing conditions. Within each respective drainage area, Project runoff would be conveyed to a proposed stormwater treatment, detention system, and sump pump and ultimately outfall through a proposed parkway drain into the public curb and gutter along Van Ness Avenue. Thus, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create or contribute runoff that would exceed the capacity of the existing drainage system, or impede or redirect flood flows. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

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

***Less Than Significant Impact.*** According to the Federal Emergency Management Agency, Flood Insurance Rate Map, the Project site is located within an area of minimal flood hazard.[14] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes, which can result in coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately 6.0 miles east of the Pacific Ocean and there are no large bodies of standing water near the Project site. As a result, tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. The Project site is not located within a flood hazard, tsunami or seiche zones potentially resulting in a release of pollutants due to Project Inundation; impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

***Less Than Significant Impact.*** Refer to Responses 4.10(a) regarding water quality. As discussed above, groundwater is supplied to the Southwest System by thirteen GSWC-owned wells in the Central Basin and the West Coast Basin. GSWC monitors well capacity, status, and water quality. In 2014, the California Sustainable Groundwater Management Act (SGMA) was passed. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.[15] According to

[14] Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1790F, effective September 26, 2008, https://msc.fema.gov/portal/home, accessed October 20, 2021.
[15] California Department of Water Resources, *SGMA Groundwater Management*, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed October 20, 2021.

the 2020 UWMP, GSWC has coordinated with nearby agencies in the development of the 2020 UWMP to ensure consistency with other related planning efforts, including GSAs, as required.

The Central Basin and West Coast Basin are adjudicated basins, which limits the amount of groundwater each party can extract annually from the adjudicated portions of the subbasins. According to the 2020 UWMP, the Central Basin adjudication limit (total of the allowed pumping allocations [APA] of each party) for groundwater extraction across the entire basin is 217,367 AFY; GSWC maintains an APA of 16,439 AFY. GSWC's APA is shared between all of their systems that extract groundwater from the Central Basin. Three agencies, Los Angeles County Department of Public Works (LACDPW), Water Replenishment District of Southern California (WRDSC), and CBMWD, work with the water producers to ensure that the APA is available to the pumpers in the Central Basin.

The West Coast Basin adjudication limit for groundwater extraction across the entire basin is 64,468 AFY; GSWC maintains legal rights to 7,502 AFY. GSWC reports monthly groundwater extractions (on a per-well basis) to the Central Basin Watermaster. Similar to the Central Basin, LACDPW, WRDSC, and CBMWD, work with the water producers to ensure that the APA is available to the pumpers in the West Coast Basin.

Groundwater pumping for the Southwest System in 2020 totaled 7,172 AFY, with 3,010 AFY from the Central Basin and 4,162 AFY from the West Coast Basin, which is less than the allocation of 16,439 AFY from the Central Basin and 7,502 AFY from the West Basin. As GSWC's groundwater rights are adjudicated, the Project would not conflict with or exceed groundwater supplies or management of the groundwater basins.

The Water Conservation Act of 2009 (SBX7-7) requires increased emphasis on water demand management and requires the State to achieve a 20 percent reduction in urban per capita water use by December 31, 2020; reporting began with the 2010 UWMP. Retail urban water suppliers are required to report their Baseline Daily Per Capita Water Use (Baseline GPCD), 2015 interim Urban Water Use Target, 2020 Urban Water Use Target, and Compliance Daily per Capita Water Use. The 2020 UWMP (Table 4-3) shows the compliance water use target for the GSWC Southwest System as 121 GPCD. The Southwest System's water usage in 2020 was 84 GPCD, well below the SBX7-7 established 2020 target of 121 GPCD (UWMP 2020). The actual 2020 GPCD is calculated as the gross water use divided by the population served. GSWC anticipates continuing to meet its 2020 target through current and future Demand Management Measures.

As discussed in Section 4.14, Population and Housing, the Project is not anticipated to generate significant population growth within the City. Currently, there are eight to nine part-time employees for the retail store and eight corporate employees. At completion, the facility would be staffed with between ten and 15 employees, both full-time and part time, and eight corporate employees. Thus, the proposed Project would be within the population projections anticipated by the City and the 2020 UWMP. Further, the proposed Project's water demand is expected to remain largely unchanged from current conditions. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

## 4.11 Land Use and Planning

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Physically divide an established community? | | | | X |
| 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? | | | X | |

***a) Physically divide an established community?***

***No Impact.*** The approximately 4.2-acre Project site is currently developed with 47,022 square feet of commercial uses and consists primarily of an existing U-Haul self-storage facility and surface parking; an unoccupied former restaurant building is located within the southern portion of the site adjacent to Rosecrans Avenue. The site is designated General Commercial and is zoned General Commercial (C-3) with a Mixed Use Overlay (MUO). North of the Project site is the United States Post Office. Areas to the north are zoned General Industrial Zone (M-2). East of the Project site is Rosecrans Place, a mixed-use development with live-work and residential uses. Areas to the east are zoned C-3 with MUO. Rosecrans Avenue is located immediately south of the Project site. South of Rosecrans Avenue are a mix of commercial uses. Areas to the south are zoned C-3 with MUO. Van Ness Avenue is located immediately west of the Project site. West of Van Ness Avenue is a mix of commercial uses. Areas to the west are zoned C-2 and P (Parking) with MUO and C-3.

The Project proposes to remove the existing on-site buildings and develop a new 177,573 gross square foot, five-story storage facility located within the northern portion of the site, as well as a separate 8,000 square foot single-story building for retail sales and office use within the southern portion of the site, adjacent to Rosecrans Avenue. The proposed storage facility would provide a total of 1,620 storage units ranging in size from 5 feet by 5 feet to 10 feet by 20 feet distributed throughout the five levels and a covered truck shunting area on the ground floor. A total of 60 parking spaces would be distributed throughout the site, primarily adjacent to Van Ness Avenue, adjacent to the southern portion of the proposed storage facility, and east and west of the retail sales and office building. The proposed self-storage use would require a zone change from General Commercial (C-3) to Heavy Commercial (C-4) and would require the approval of a conditional use permit. The Project would not involve any roadways or significant infrastructure systems that would physically divide the site or separate the site from surrounding uses. Development of the site, as proposed, would be in accordance with other commercial uses that occur within the surrounding area. Thus, no impact would occur in this regard.

***Mitigation Measures:*** No mitigation measures are required.

***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?***

***Less Than Significant Impact.*** According to the City of Gardena Land Use Map (General Plan Land Use Element Figure LU-2), the Project site is designated General Commercial with a Mixed Use Overlay (MUO). The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. The maximum permitted floor area ratio (FAR) is 0.5 in general and up to 2.75 for specific uses when allowed by the Zoning Code. The MUO land use designation permits residential development on selected areas designated for Commercial and Industrial land uses. The purpose of this land use designation is to allow greater flexibility of development alternatives, especially attractive higher density residential development in appropriate areas that are experiencing both physical and economic blight.

The City of Gardena Zoning Map identifies the zoning for the Project site as General Commercial (C-3) with a Mixed Use Overlay (MUO). The Gardena Municipal Code, Chapter 18.32, *General Commercial Zone (C-3)*, states the C-3 zone is intended for general commercial uses and identifies the permitted uses and property development standards for properties within the C-3 zone. Gardena Municipal Code Chapter 18.19, *Mixed Use Overlay Zone (MUO)*, states the mixed use overlay zone is intended to allow greater flexibility of development alternatives, especially attractive higher density residential development and live-work buildings, in appropriate areas of the city.

The Project proposes to remove the existing on-site structures to develop a new storage facility, truck and trailer sharing, and retail sales office. Self-storage use is not permitted within the C-3 zone. The Project proposes a Zone Change to change the zoning designation for three parcels (approximately 4.2 acres) from C-3 (General Commercial) to C-4 (Heavy Commercial) with a MUO, consistent with the existing zoning of the surrounding area. The Project also proposes a Zone Text Amendment to allow for greater ground floor street frontage when a proposed self-storage facility is set back at least 50 feet from the public right-of-way. A self-storage facility within a C-4 zone is only permitted conditionally. The Project also proposes a Conditional Use Permit (CUP) to allow for the applied use and operation of a self-storage facility on the Project site.

Gardena Municipal Code Chapter 18.46, *Conditional Use Permits*, identifies uses subject to a CUP. A self-storage facility within the C-4 zone may be conditionally permitted provided it meets certain requirements including, but not limited to, minimum lot area, setbacks, as well as landscaping. Gardena Municipal Code Section 18.46.040, *Procedure*, establishes the procedures for obtaining CUPs. In considering a CUP, several factors are required to be considered by the City including the nature of the proposed use; compatibility of the proposed use with the surrounding area and land uses; distance between the proposed use and residential areas, schools, houses of worship, and parks; number of similar uses in the surrounding area and the distances between such uses and the proposed use; input of persons residing in the community regarding the proposed use and the community opposition; cumulative effect of the proposed use; and whether the proposed use would be detrimental the health, safety, peace, morals, comfort and general welfare of the community or to property or improvements in the neighborhood, as well as other factors deemed relevant. In granting a CUP, specific findings are required to be made including, but not limited to, that the use is necessary or desirable and is compatible with surrounding uses, is in harmony with the

General Plan, is not detrimental to the surrounding properties, existing uses or uses permitted in the zone; and the site is adequate to accommodate the development requirements.

Gardena Municipal Code Chapter 18.34, *Heavy Commercial Zone (C-4)*, establishes the uses permitted and development standards for the C-4 Zone, including lot area; lot dimensions; building heights and setbacks; and landscaping. Within the C-4 zone, a minimum lot area of 7,500 square feet, minimum lot width at the building line of 50 feet and a minimum lot depth of 150 feet are required. The Project site is approximately 4.2-acres and meets the minimum lot area, width, and depth requirements. The maximum building height allowed in the C-4 zone is 65 feet. The proposed self-storage facility would be 62.5 feet tall and five stories. The gross floor area of buildings or structures on lots that comprise a project site shall not exceed 0.50 FAR with the exception of a development where at least eighty percent of the development includes self-storage facilities, in which case the FAR shall not exceed 2.75; the proposed Project has a FAR of 1.01. A minimum ten-foot landscape perimeter shall be provided along all street frontages; the Project's proposed landscape buffer is 10 feet, with a total landscaped area of 23,396 square feet.

Gardena Municipal Code Chapter 18.42, *General Provisions*, establishes building setbacks for commercial and industrial development under Chapter 18.42.085. Where the Project site building fronts a street, a building setback of no less than 10 feet is required; the setback is also required to be landscaped and maintained as well. Where the Project site building sides upon a street, a side yard of no less than 10 feet is required; the side yard is required to be landscaped and maintained as well. Where the Project site building rears upon a street, a rear-building setback of no less than 10 feet is required; the rear-setback is also required to be landscaped and maintained as well. The Project proposes to provide a front, side, and rear yard setback of 10 feet for each, respectively.

Gardena Municipal Code Chapter 18.44, *Site Plan Review*, requires site plans be submitted for any development project requesting a GPA, ZC, Conditional Use Permit (CUP), variance, tract map, or other discretionary permit. As discussed in Section 2.0, the Project is requesting a ZC and CUP. In accordance with Gardena Municipal Code Section 18.44.030, *Factors for approval*, the Site Plan would only be approved (or conditionally approved) after finding that the proposed development, including the physical design of the development, is consistent with the intent and general purpose of the Gardena General Plan and provisions of the Gardena Municipal Code. The Project would be consistent with the City's development standards.

Following the City's approval of the requested CUP, ZC, and ZTA the Project would be consistent with the Gardena General Plan and Gardena Municipal Code. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

This page intentionally left blank.

## 4.12 Mineral Resources

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | | X |
| 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? | | | | X |

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

***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.*** The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential. According to the Gardena General Plan, the State Division of Mines and Geology has not designated any lands within the City as a State classified mineral resources deposit area. In addition, no areas within the City are designated for mineral resources extraction.

***Mitigation Measures:*** No mitigation measures are required.

This page intentionally left blank.

## 4.13 Noise

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | X | |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | | | X | |
| 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? | | | | X |

This section is based on the *U-Haul Redevelopment Project Noise Impact Study* (Noise Study), prepared by MD Acoustics, dated November 15, 2021 and included in its entirety as Appendix F, Noise Study. The Noise Study assumes that that construction of the residential development to the east of the Project site would be completed and the residential development would be occupied by the time construction begins on the proposed Project.

**FUNDAMENTALS OF NOISE**

**Sound, Noise, Acoustics**

Sound is a disturbance created by a moving or vibrating source and is capable of being detected by the hearing organs. Sound may be thought of as mechanical energy of a moving object transmitted by pressure waves through a medium to a human ear. For traffic, or stationary noise, the medium of concern is air. Noise is defined as sound that is loud, unpleasant, unexpected, or unwanted.

**Frequency and Hertz**

A continuous sound is described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch (bass sounding) and high-frequency sounds are high in pitch (squeak). These oscillations per second (cycles) are commonly referred to as Hertz (Hz). The human ear can hear from the bass pitch starting out at 20 Hz all the way to the high pitch of 20,000 Hz.

**Sound Pressure Levels and Decibels**

The amplitude of a sound determines it loudness. The loudness of sound increases or decreases as the amplitude increases or decreases. Sound pressure amplitude is measured in units of micro-Newton per square inch meter (N/m2), also called micro-Pascal (µPa). One µPa is approximately one hundred billionths (0.00000000001) of normal atmospheric pressure. Sound pressure level (SPL or Lp) is used to describe in logarithmic units the ratio of actual sound pressures to a reference pressure squared. These units are called decibels abbreviated dB.

**Addition of Decibels**

Because decibels are on a logarithmic scale, sound pressure levels cannot be added or subtracted by simple plus or minus addition. When two sounds or equal SPL are combined, they will produce an SPL 3 dB greater than the original single SPL. In other words, sound energy must be doubled to produce a 3 dB increase. If two sounds differ by approximately 10 dB, the higher sound level is the predominant sound.

**Human Response to Changes in Noise Levels**

In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, (A weighted scale) and it perceives a sound within that range as being more intense than a sound with a higher or lower frequency with the same magnitude. For purposes of this analysis, the A-scale weighting is typically reported in terms of A-weighted decibel (dBA). Typically, the human ear can barely perceive the change in noise level of 3 dB. A change in 5 dB is readily perceptible, and a change in 10 dB is perceived as being twice or half as loud. As previously discussed, a doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g. doubling the volume of traffic on a highway) would result in a barely perceptible change in sound level.

**Noise Descriptors**

Noise in our daily environment fluctuates over time. Some noise levels occur in regular patterns, others are random. Some noise levels are constant while others are sporadic. Noise descriptors were created to describe the different time-varying noise levels.

A-Weighted Sound Level: The sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear. A numerical method of rating human judgment of loudness.

Ambient Noise Level: The composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

Community Noise Equivalent Level (CNEL): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 PM to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

Decibel (dB): A unit for measuring the amplitude of a sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micro-pascals.

dB(A): A-weighted sound level (see definition above).

Equivalent Sound Level (LEQ): The sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time varying noise level. The energy average noise level during the sample period.

Habitable Room: Any room meeting the requirements of the Uniform Building Code or other applicable regulations which is intended to be used for sleeping, living, cooking or dining purposes, excluding such enclosed spaces as closets, pantries, bath or toilet rooms, service rooms, connecting corridors, laundries, unfinished attics, foyers, storage spaces, cellars, utility rooms and similar spaces.

L(n): The A-weighted sound level exceeded during a certain percentage of the sample time. For example, L10 is the sound level exceeded 10 percent of the sample time. Similarly, L50, L90 and L99, etc.

Noise: *A*ny unwanted sound or sound which is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying. The State Noise Control Act defines noise as "...excessive undesirable sound...".

Outdoor Living Area: Outdoor spaces that are associated with residential land uses typically used for passive recreational activities or other noise-sensitive uses. Such spaces include patio areas, barbecue areas, jacuzzi areas, etc. associated with residential uses; outdoor patient recovery or resting areas associated with hospitals, convalescent hospitals, or rest homes; outdoor areas associated with places of worship which have a significant role in services or other noise-sensitive activities; and outdoor school facilities routinely used for educational purposes which may be adversely impacted by noise. Outdoor areas usually not included in this definition are: front yard areas, driveways, greenbelts, maintenance areas and storage areas associated with residential land uses; exterior areas at hospitals that are not used for patient activities; outdoor areas associated with places of worship and principally used for short-term social gatherings; and, outdoor areas associated with school facilities that are not typically associated with educational uses prone to adverse noise impacts (e.g., school play yard areas).

Percent Noise Levels: See L(n).

Sound Level (Noise Level): The weighted sound pressure level obtained by use of a sound level meter having a standard frequency-filter for attenuating part of the sound spectrum.

Sound Level Meter: An instrument, including a microphone, an amplifier, an output meter, and frequency weighting networks for the measurement and determination of noise and sound levels.

Single Event Noise Exposure Level (SENEL): The dB(A) level which, if it lasted for one second, would produce the same A-weighted sound energy as the actual event.

**Traffic Noise Prediction**

Noise levels associated with traffic depends on a variety of factors: (1) volume of traffic, (2) speed of traffic, (3) auto, medium truck (2–3 axle) and heavy truck percentage (4 axle and greater), and sound propagation. The greater the volume of traffic, higher speeds, and truck percentages equate to a louder

volume in noise. A doubling of the Average Daily Traffic (ADT) along a roadway will increase noise levels by approximately 3 dB.

**Sound Propagation**

As sound propagates from a source it spreads geometrically. Sound from a small, localized source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates at a rate of 6 dB per doubling of distance. The movement of vehicles down a roadway makes the source of the sound appear to propagate from a line (i.e., line source) rather than a point source. This line source results in the noise propagating from a roadway in a cylindrical spreading versus a spherical spreading that results from a point source. The sound level attenuates for a line source at a rate of 3 dB per doubling of distance.

As noise propagates from the source, it is affected by the ground and atmosphere. Noise models use hard site (reflective surfaces) and soft site (absorptive surfaces) to help calculate predicted noise levels. Hard site conditions assume no excessive ground absorption between the noise source and the receiver. Soft site conditions such as grass, soft dirt or landscaping attenuate noise at a rate of 1.5 dB per doubling of distance. When added to the geometric spreading, the excess ground attenuation results in an overall noise attenuation of 4.5 dB per doubling of distance for a line source and 7.5 dB per doubling of distance for a point source.

Research has demonstrated that atmospheric conditions can have a significant effect on noise levels when noise receivers are located 200 feet from a noise source. Wind, temperature, air humidity and turbulence can further impact have far sound can travel.

**GROUND-BOURNE VIBRATION FUNDAMENTALS**

**Vibration Descriptors**

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude.

- PPV – Known as the peak particle velocity (PPV) which is the maximum instantaneous peak in vibration velocity, typically given in inches per second.
- RMS – Known as root mean squared (RMS) can be used to denote vibration amplitude.
- VdB – A commonly used abbreviation to describe the vibration level (VdB) for a vibration source.

**Vibration Perception**

Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible groundborne noise or vibration. To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment.

There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Rayleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a "push-pull" fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse, or side-to-side and perpendicular to the direction of propagation.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. As stated above, this drop-off rate can vary greatly depending on the soil but has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests.

**EXISTING NOISE ENVIRONMENT**

**Stationary Sources**

Stationary noise sources within the Project site and vicinity are primarily those associated with surface parking and rooftop mechanical equipment (e.g., heating ventilation and air condition [HVAC] equipment). The noise associated with these sources and other nearby sources may represent a single-event noise occurrence or short-term noise.

**Noise Measurements**

Noise measurements are taken to determine the existing noise levels. A noise receiver or receptor is any location in the noise analysis in which noise might produce an impact. Noise monitoring locations were selected based on the distance from Rosecrans Avenue and Van Ness Avenue to the nearest sensitive on-site receptors. A twenty-four (24) hour noise measurement was conducted near the eastern property line

of the Project site. The measurements measured the 1-hour Leq, minimum sound level (Lmin), maximum sound level (Lmax) and other statistical data (e.g. L2, L8); refer to Table 4.13-1, *Long-Term Noise Measurement Data (dBA)*. As indicated in Table 4.13-1, ambient hourly noise levels range between 57.4 and 65.5 dBA Leq.

**Table 4.13-1**
**Long-Term Noise Measurement Data (dBA)**

| Date | Time[1] | Leq | Lmax | Lmin | L(2)[2] | L(8)[2] | L(25)[2] | L(50)[2] |
|---|---|---|---|---|---|---|---|---|
| 6/3/2021 | 5PM-6PM | 58.0 | 75.4 | 50.2 | 61.5 | 60.0 | 59.6 | 57.5 |
| | 6PM-7PM | 58.1 | 75.5 | 48.8 | 62.7 | 61.8 | 60.8 | 56.4 |
| | 7PM-8PM | 57.4 | 76.1 | 47.4 | 66.1 | 59.9 | 58.6 | 55.7 |
| | 8PM-9PM | 54.7 | 63.5 | 50.4 | 60.8 | 59.1 | 56.2 | 53.8 |
| | 9PM-10PM | 54.0 | 70.1 | 47.5 | 56.3 | 56.1 | 55.6 | 54.0 |
| | 10PM-11PM | 53.6 | 63.9 | 48.8 | 56.3 | 56.1 | 55.5 | 53.1 |
| | 11PM-12AM | 53.2 | 63.6 | 48.4 | 56.1 | 55.8 | 55.4 | 52.4 |
| 6/4/2021 | 12AM-1AM | 53.2 | 69.3 | 47.7 | 57.4 | 55.9 | 55.7 | 52.1 |
| | 1AM-2AM | 52.4 | 64.6 | 46.8 | 55.5 | 55.1 | 55.0 | 51.0 |
| | 2AM-3AM | 52.7 | 57.2 | 45.1 | 54.8 | 54.7 | 54.5 | 53.9 |
| | 3AM-4AM | 50.3 | 61.4 | 44.4 | 54.7 | 54.5 | 54.5 | 48.1 |
| | 4AM-5AM | 49.1 | 64.8 | 44.4 | 54.5 | 50.9 | 50.4 | 48.1 |
| | 5AM-6AM | 51.3 | 77.6 | 45.7 | 56.3 | 53.3 | 52.3 | 50.3 |
| | 6AM-7AM | 54.5 | 75.4 | 47.4 | 58.3 | 57.6 | 57.0 | 53.8 |
| | 7AM-8AM | 57.9 | 71.9 | 48.6 | 61.7 | 60.6 | 59.8 | 57.7 |
| | 8AM-9AM | 62.5 | 84.2 | 51.5 | 70.7 | 66.7 | 64.2 | 58.7 |
| | 9AM-10AM | 65.5 | 85.5 | 51.0 | 73.8 | 73.6 | 71.0 | 61.0 |
| | 10AM-11AM | 62.5 | 78.3 | 53.5 | 68.7 | 68.3 | 67.0 | 59.7 |
| | 11AM-12PM | 59.5 | 81.7 | 53.6 | 63.9 | 63.0 | 60.8 | 58.5 |
| | 12PM-1PM | 60.2 | 76.0 | 54.1 | 66.8 | 65.0 | 63.1 | 58.3 |
| | 1PM-2PM | 61.9 | 82.7 | 52.4 | 69.4 | 68.4 | 65.8 | 58.4 |
| | 2PM-3PM | 58.4 | 74.5 | 54.0 | 62.0 | 60.6 | 59.8 | 58.0 |
| | 3PM-4PM | 58.8 | 76.9 | 53.6 | 64.0 | 61.6 | 60.2 | 57.9 |
| | 4PM-5PM | 57.6 | 73.4 | 47.4 | 62.6 | 60.0 | 59.2 | 56.6 |
| CNEL | | 61.5 | | | | | | |

Notes:
1. Measurements taken between June 3, 2021 and June 4, 2021 over one-hour intervals.
2. The A-weighted sound level exceeded during a certain percentage of the sample time. For example, L10 in the sound level exceeded 10 percent of the sample time. Similarly L50, L90, and L99, etc.

**Sensitive Receptors**

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. The sensitive receptor nearest to the Project site consists of residential uses to the east. As a conservative measure, the Noise Study assumes that construction of the residential development to the east of the Project site will be completed and occupied by the time construction begins on the proposed Project.

**REGULATORY FRAMEWORK**

**City of Gardena General Plan**

Applicable policies and standards governing environmental noise in the City are set forth in the General Plan Noise Element. Table N-1 of the Gardena Noise Element outlines the interior and exterior noise standards for community noise environments. According to Table N-1 commercial use noise limits are normally acceptable up to 70 dBA CNEL. In addition to the noise standards, the City has outlined goals, policies and implementation measures to reduce potential noise impacts.

The City of Gardena General Plan regulates construction noise. The impact of construction noise that occurs during the daytime is considered minimal for no more than two or three months of activity. However, late night and weekend disturbances caused by construction noise may create a significant impact when experienced at nearby residential locations.

**City of Gardena Municipal Code**

Gardena Municipal Code Section 8.36.040, *Exterior noise standards*, and 8.36.050, *Interior noise standards* state the exterior and interior noise standards for the City in terms of Leq(15) and Lmax. The allowable noise levels at land uses receiving noise are summarized in Table 4.13-2, *Allowable Exterior and Interior Noise Levels*. The Gardena Municipal Code states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standards. Gardena Municipal Code Section 8.36.070, *Prohibited acts*, prohibits the operation of a device that generates vibration which is above the perception threshold of an individual at or beyond the property line if the source is on private property.

Gardena Municipal Code Section 8.36.080, *Exemptions*, exempts noise associated with construction, repair, remodeling, grading or demolition of any real property from the City's noise limitations, provided these activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays; between the hours of 6:00 p.m. and 9:00 a.m. on Saturday; or any time on Sunday or a Federal holiday.

**Table 4.13-2**
**Allowable Exterior and Interior Noise Levels**

| Type of Land Use | 15-Minute Average Noise Level (Leq(15)) | | Maximum Noise Level (Lmax) | |
|---|---|---|---|---|
| | 7 am – 10 pm | 10 pm to 7 am | 7 am – 10 pm | 10 pm to 7 am |
| **Exterior Noise Levels** | | | | |
| Residential | 55 dB(A) | 50 dB(A) | 75 dB(A) | 70 dB(A) |
| Residential portions of mixed-use | 60 dB(A) | 50 dB(A) | 80 dB(A) | 70 dB(A) |
| Commercial | 65 dB(A) | 60 dB(A) | 85 dB(A) | 80 dB(A) |
| Industrial and manufacturing | 70 dB(A) | 70 dB(A) | 90 dB(A) | 90 dB(A) |
| **Interior Noise Levels** | | | | |
| Residential | 45 dB(A) | 40 dB(A) | 65 dB(A) | 60 dB(A) |
| Residential portions of mixed-use | 45 dB(A) | 40 dB(A) | 70 dB(A) | 60 dB(A) |
| Source: City of Gardena, Municipal Code, Sections 8.36.040 and 8.36.050. | | | | |

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

***Less Than Significant Impact.***

**CONSTRUCTION NOISE**

The degree of construction noise may vary for different areas of the Project site and also vary depending on the construction activities. Noise levels associated with the construction would vary with the different phases of construction. Typical noise levels associated with construction equipment are shown in Table 4.13-3, *Typical Construction Noise Levels*.

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities would require concrete saws, excavators, and dozers during demolition; graders, scrapers, and tractors during site preparation; graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, tractors, and paving equipment during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels would be loudest during site preparation phase.

**Table 4.13-3**
**Typical Construction Noise Levels**

| Type | Noise Levels (dBA) at 50 Feet[1] |
|---|---|
| **Earth Moving** | |
| Compactors (Rollers) | 73-76 |
| Front Loaders | 73-84 |
| Backhoes | 73-92 |
| Tractors | 75-95 |
| Scrapers, Graders | 78-92 |
| Pavers | 85-87 |
| Trucks | 81-94 |
| **Materials Handling** | |
| Concrete Mixers | 72-87 |
| Concrete Pumps | 81-83 |
| Cranes (Movable) | 72-86 |
| Cranes (Derrick) | 85-87 |
| **Stationary** | |
| Pumps | 68-71 |
| Generators | 71-83 |
| Compressors | 75-86 |
| **Impact Equipment** | |
| Saws | 71-82 |
| Vibrators | 68-82 |
| Notes:<br>1. Referenced Noise Levels from the Environmental Protection Agency (EPA) | |

Construction noise was projected from the center of the site to represent an average of equipment moving around the site. Table 4.13-4, *Average Construction Noise Level by Phase (dBA)*, provides the average construction noise levels at the nearest sensitive receptor, the adjacent residences to the east of the Project site.

**Table 4.13-4**
**Average Construction Noise Level by Phase (dBA)**

| Activity | Leq at 160 Feet (East Residences) |
|---|---|
| Site Preparation | 79 |
| Demolition | 77 |
| Grading | 77 |
| Building Construction | 77 |
| Paving | 78 |
| Architectural Coating | 67 |

A single bulldozer 25 feet from the eastern residential buildings (running adjacent to the property line) would have an Lmax level of 91 dBA. This maximum level would only occur during the short periods when

equipment is operating along the property line. Construction noise is considered a short-term impact and would be considered significant if construction activities occur outside the allowable times as described in the City's General Plan and Municipal Code. However, Project construction would occur during the permissible hours in accordance with the City's General Plan and Municipal Code. Thus, construction impacts would not be considered significant. With implementation of recommended conditions of approval, construction-related noise would be further reduced. Implementation of recommended conditions of approval include ensuring construction equipment is equipped with noise attenuating devices and would also require orientation of stationary construction equipment away from nearby sensitive receptors, among other requirements.

**OPERATIONAL NOISE**

**Stationary Noise Sources**

The Project proposes to remove the existing on-site buildings and develop a new 177,573 gross square foot, five-story storage facility located within the northern portion of the site, as well as a separate 8,000 square foot single-story building for retail sales and office use within the southern portion of the site, adjacent to Rosecrans Avenue. The proposed storage facility would provide a total of 1,620 storage units ranging in size from 5 feet by 5 feet to 10 feet by 20 feet distributed throughout the five levels and a covered truck shunting area on the ground floor. Noise typical of commercial uses include conversations, parking, and general maintenance activities. The proposed U-Haul use would operate between 7:00 AM and 7:00 PM Monday through Thursday and Saturday, 7:00 AM and 8:00 PM on Friday, and 9:00 AM and 5:00 PM on Sunday, and would be required to comply with the Gardena General Plan and Municipal Code noise standards. The area surrounding the Project site is developed and comprised primarily of industrial uses to the north, mixed-use and residential uses to the east, and commercial uses to the south and west. Rosecrans Avenue and Van Ness Avenue form the site's southern and western borders, respectively. Vehicle parking and rooftop mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) would be the primary stationary noise sources within the Project site.

The future worst-case noise level projections were modeled using referenced sound level data for the on-site stationary sources (parking spaces, driveways, and HVAC equipment). The model assumes a total of 60 parking spaces and 63 Trane air conditioning units (worst-case scenario). The Noise Analysis modeled parking with a reference noise level of 0.72 cars per hour coming and going from the parking spots (per the peak hour of the trip generation divided by the number of parking spots). The rooftop unit was modeled as a line source with a sound power level of 74 dBA. The model evaluates the noise attenuating effects of any existing or proposed property line walls. A total of four receptors were modeled using the SoundPLAN noise model to evaluate the proposed Project's operational impact; refer to Table 4.13-5, Worst-Case Predicted Operational Leq Noise Level.

**Table 4.13-5**
**Worst-Case Predicted Operational Leq Noise Level**

| Receptor[1] | Floor | Existing Ambient Noise Level (dBA, Leq)[2] | Project Noise Level (dBA, Leq)[3] | Total Combined Noise Level (dBA, Leq) | Daytime (7AM -10 PM) Stationary Noise Limit (dBA, Leq) | Change in Noise Level as Result of Project |
|---|---|---|---|---|---|---|
| R1 | 1 | 57 | 43 | 57 | 65 | 0 |
| R2 | 1 | | 38 | 57 | 65 | 0 |
| R3 | 1 | | 45 | 57 | 60 | 0 |
| | 2 | | 45 | 57 | 60 | 0 |
| | 3 | | 44 | 57 | 60 | 0 |
| R4 | 1 | | 44 | 57 | 65 | 0 |

Notes:
1. Receptors R1, R2, and R4 represent commercial uses. Receptor R3 is a residential use.
2. Existing measured ambient condition.
3. Refer to Exhibit F in Appendix F for the location and operational noise level projections at each receptor.

Project only operational noise levels at the adjacent uses are anticipated to range between 38 dBA to 45 dBA Leq (depending on the location), which is below the City's 60 dBA mixed-use residential limit and 65 dBA commercial daytime noise limit.

As shown in Table 4.13-5, the Project plus ambient noise level projections are anticipated to be 57 dBA Leq at the receptors. Thus, the Project would not result in a perceptible increase in noise at the adjacent uses. As a conservative measure, the Noise Analysis has compared the worst-case operational daytime noise levels with the lowest measured ambient levels during operational hours. The total combined noise level is below the 60 dBA mixed-use residential daytime noise limit and the 65 dBA commercial daytime noise limit. Further, the interior noise level at the adjacent residential properties is projected to be 40 dBA, Leq during operational hours, which is below the 45 dBA daytime residential mixed-use limit. Therefore, the Project complies with all local noise regulations and impacts associated with Project stationary noise would be less than significant.

**Off-Site Traffic Noise**

The proposed Project would generate traffic volumes along Rosecrans Avenue and Van Ness Avenue. The Project would result in 120 net average daily trips (ADT). In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a 3-dBA increase.

The potential off-site noise impacts caused by the increase in vehicular traffic as a result of the Project were calculated at a distance of 50 feet. The distance to the 55, 60, 65, and 70 dBA CNEL noise contours

are provided in Appendix F for reference. The noise levels and contours were calculated for 2022 without Project and 2022 with Project. The CNEL levels would increase less than 0.1 dBA on Rosecrans and Van Ness Avenues as a result of the Project. This increase would not be perceptible; thus, traffic noise impacts

Given that the Project would comply with all noise requirements, Project construction and operation would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the General Plan, Noise Ordinance, or applicable standards of other agencies and impacts would be less than significant.

COA N-1: Prior to approval of grading plans and/or issuance of demolition, grading, and building permits, the following noise reduction techniques shall be included in the construction plans or specifications:

- Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices.
- The Project Applicant shall demonstrate to the satisfaction of the City's Building Official that construction noise reduction methods shall be used where feasible, including shutting off idling equipment.
- During construction, equipment staging areas shall be located such that the greatest distance is between the staging area noise sources and noise-sensitive receptors.
- Per Gardena Municipal Code Section 8.36.080, construction activities shall not occur during the hours of 6:00 p.m. and 7:00 a.m. on weekdays; between the hours of 6:00 p.m. and 9:00 a.m. on Saturday; or any time on Sunday or a Federal holiday.

**Mitigation Measures:** No mitigation measures are required.

***b) Generation of excessive groundborne vibration or groundborne noise levels?***

***Less Than Significant Impact***. Construction activities can produce vibration that may be felt by adjacent land uses. The Caltrans Transportation and Construction Induced Vibration Guidance Manual provides general thresholds and guidelines as to the vibration damage potential from vibration impacts. Table 4.13-6, *Guideline Vibration Damage Potential Threshold Criteria*, identifies the thresholds and Table 4.13-7, *Vibration Source Levels for Construction Equipment*, identifies the approximate vibration levels for particular construction activities at a distance of 25 feet.

**Table 4.13-6**
**Guideline Vibration Damage Potential Threshold Criteria**

| Structure and Condition | Maximum PPV (in/sec) | |
|---|---|---|
| | Transient Sources | Continuous/Frequent Intermittent Sources |
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some older buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1.0 | 0.5 |
| Modern industrial/commercial buildings | 2.0 | 0.5 |
| Source: Caltrans, *Transportation and Construction Vibration Guidance Manual*, Table 19, September 2013. | | |
| Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. | | |

**Table 4.13-7**
**Vibration Source Levels for Construction Equipment**

| Equipment | Peak Particle Velocity (inches/second) at 25 feet | Approximate Vibration Level LV (dVB) at 25 feet |
|---|---|---|
| Pile driver (impact | 1.518 (upper range) | 112 |
| | 0.644 (typical) | 104 |
| Pile driver (sonic) | 0.734 (upper range) | 105 |
| | 0.170 (typical) | 93 |
| Clam shovel drop (slurry wall) | 0.202 | 94 |
| Hydromill | 0.008 (in soil) | 66 |
| Slurry wall | 0.017 (in rock) | 75 |
| Vibratory roller | 0.21 | 94 |
| Hoe ram | 0.089 | 87 |
| Large bulldozer | 0.089 | 87 |
| Caisson drill | 0.089 | 87 |
| Loaded trucks | 0.076 | 86 |
| Jackhammer | 0.035 | 79 |
| Small bulldozer | 0.003 | 58 |
| Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006. | | |

The area surrounding the Project site is developed and comprised primarily of industrial uses to the north, mixed-use and residential uses to the east, and commercial uses to the south and west. Rosecrans Avenue and Van Ness Avenue form the site's southern and western borders, respectively. The nearest residential structures to the east are approximately 25 feet from construction activities. The construction of the proposed Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle

velocity (PPV) at 25 feet which is below the 0.30 FTA threshold. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest residential structures. Potential vibration impacts would be less than significant, and no mitigation is required.

***Mitigation Measures:*** No mitigation measures are required.

***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.** Hawthorne Municipal Airport is located approximately 0.5-mile west of the northwestern-most portion of the City of Gardena and approximately 1.5 miles from the Project site. The City of Hawthorne General Plan Noise Element provides noise contours (Figures 5A and 5B) for the City, which include the airport. The noise contours associated with the airport do not extend beyond the municipal boundaries of the City of Hawthorne. Thus, development of an expanded U-Haul facility within the City of Gardena would not be exposed to excessive noise associated with the Hawthorne Municipal Airport.

***Mitigation Measures:*** No mitigation measures are required.

## 4.14 Population and Housing

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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)? | | | X | |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | X |

***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)?***

***Less Than Significant Impact.*** The Project would not induce substantial unplanned population growth directly through new homes or, indirectly through the extension of roads or other infrastructure or, increased commercial development. The Project site is currently developed and surrounded by existing development. The Project proposes to remove the existing U-Haul facility and unoccupied former restaurant and develop a new, modern U-Haul facility.

Employment-generating uses currently occur within the site and have been anticipated by the General Plan. Currently, there are eight to nine part-time employees for the retail store and eight corporate employees. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated. At completion, the facility would be staffed with between ten and 15 employees, both full-time and part time, and eight corporate employees during the sales office hours (between 7:00 AM and 7:00 PM Monday through Thursday and Saturday, 7:00 AM and 8:00 PM on Friday, and 9:00 AM and 5:00 PM Sunday). Thus, the Project would not induce substantial unplanned population growth to the area and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

***No Impact.*** The approximately 4.2-acre Project site is currently developed with an existing U-Haul facility and an unoccupied former restaurant building. The site does not contain any housing. Thus, the proposed

Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

***Mitigation Measures:*** No mitigation measures are required.

## 4.15 Public Services

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. 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: | | | | |
| 1) Fire protection? | | | X | |
| 2) Police protection? | | | X | |
| 3) Schools? | | | X | |
| 4) Parks? | | | X | |
| 5) Other public facilities? | | | X | |

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

***1) Fire protection?***

***Less Than Significant Impact.*** The City contracts with the Los Angeles County Fire Department (LACFD) to provide fire protection and emergency medical services to the City. There are two fire stations located within the City: Fire Station 158 located at 1650 West 162nd Street and Fire Station 159 located at 2030 West 135th Street. The closest fire station to the Project site is Fire Station 159, located approximately 0.5 miles northeast of the site.

The Project site is currently developed with an existing U-Haul facility and an unoccupied former restaurant building. The Project proposes to remove the existing on-site buildings and develop a new, modern U-Haul facility with a 177,573 gross square foot, five-story self-storage building located within the northern portion of the site, as well as a separate 8,000 square foot single-story building for retail sales and office use within the southern portion of the site, adjacent to Rosecrans Avenue. The Project site would be accessible from two existing driveways and one proposed driveway on Van Ness Avenue

and from an existing driveway on West Rosecrans Avenue, at the southeast corner of the Project site. All driveways would allow emergency vehicle access.

The proposed Project would not result in the construction of new or physically altered fire facilities. Service to the Project site by LACFD occurs under existing conditions. The continuation of commercial uses within the Project site would not incrementally increase the demand for fire protection or emergency medical services to the site. As discussed in Response 4.14(a), employment-generating uses currently occur within the site and have been anticipated by the General Plan. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not significantly impact fire protection services resulting in the need for new or physically altered facilities.

As part of the development review process, the LACFD Fire Prevention Division would review the proposed Project site plan and determine if access and water system requirements, which would enhance the proposed development's fire protection, are adequate. Further, the Project would be required to comply with standard LACFD conditions of approval. Specifically, LACFD review addresses fire and life safety requirements for project construction at the fire plan check stage. This includes plan review of the design details of the architectural, structural, mechanical, plumbing, and electrical systems. The Project would be required to comply with applicable City, County, and State code and ordinance requirements for fire protection. The City of Gardena Municipal Code Chapter 8.08, *Fire Code*, adopts the Los Angeles County Fire Code by reference. Implementation of all Fire Code requirements would further reduce potential impacts concerning fire protection services. The Project would not require the need for new or physically altered fire station facilities in order to maintain acceptable service ratios, response times or other performance objectives and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***2) Police protection?***

***Less Than Significant Impact.*** The City of Gardena Police Department provides police protection services to the City, including the Project site. The Gardena Police Department is located at 1718 West 162nd Street, approximately 1.5 miles southeast of the Project site.

The proposed Project would not result in the construction of new or physically altered police facilities. The Project proposes to remove the existing on-site buildings and develop a new self-storage facility and separate retail sales office providing U-Haul truck and trailer sharing and retail sales. Service to the Project site by Gardena Police Department occurs under existing conditions. The continuation of commercial uses to the Project site would not incrementally increase the demand for police protection services to the site. As discussed in Response 4.14(a), employment-generating uses currently occur within the site and have been anticipated by the General Plan. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not significantly impact police protection services resulting in the need for new or physically altered facilities.

As part of the development review process, Gardena Police Department would review the Project site plan and determine if security measures are adequate. The Applicant would be required to comply with

any specific conditions related to safety and security specified by the Gardena Police Department as a condition of approval. As discussed in Response 4.1(d), the Project would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and Lighting Plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. The Project would not require the need for new or physically altered police facilities in order to maintain acceptable service ratios, response times or other performance objectives and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***3) Schools?***

***Less Than Significant Impact.*** The City is located within the Los Angeles Unified School District – Local South District (LAUSD) boundaries. The Project does not propose the development of residential uses; therefore, the Project would not directly result in new students to the LAUSD. As discussed in Response 4.14(a), employment-generating uses currently occur within the site and have been anticipated by the General Plan. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not result in an increase in potential new students to the LAUSD. The Project would not require the need for new or physically altered school facilities and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***4) Parks?***

***Less Than Significant Impact.*** The proposed Project is not anticipated to generate new residents to the City resulting in increased use of park facilities. As discussed in Response 4.14(a), employment-generating uses currently occur within the site and have been anticipated by the General Plan. The Project proposes to remove the existing on-site buildings and develop a new self-storage facility and separate retail sales office providing U-Haul truck and trailer sharing and retail sales. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not induce population growth within the City that would potentially result in a significant increase in the use of existing parks within the area. The proposed Project would not involve the construction of new park facilities nor would it result in the need for new or physically altered park facilities. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities.

***Mitigation Measures:*** No mitigation measures are required.

***5) Other public facilities?***

***Less Than Significant Impact.*** Los Angeles County provides library, cultural resource centers and bookmobile services to over 3.4 million residents living in unincorporated areas and to residents in 49 of the 88 incorporated cities of Los Angeles County, including the City of Gardena.

As discussed in Response 4.14(a), employment-generating uses currently occur within the site and have been anticipated by the General Plan. The Project proposes to remove the existing on-site buildings and

develop a new self-storage facility and separate retail sales office providing U-Haul truck and trailer sharing and retail sales. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not significantly impact public services resulting in the need for new or physically altered facilities. The proposed Project would not result in the need for new or physically altered public facilities. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities.

***Mitigation Measures:*** No mitigation measures are required.

## 4.16 Recreation

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | X | |
| 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? | | | X | |

***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?***

***Less Than Significant Impact.*** Refer to Response to 4.15(a)(4).

***Mitigation Measures:*** Less Than Significant 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?***

***Less Than Significant Impact.*** Refer to Response to 4.15(a)(4). The Project proposes to remove the existing on-site buildings and develop a new self-storage facility and separate retail sales office providing U-Haul truck and trailer sharing and retail sales. The development of recreational facilities is not proposed as part of the Project. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

This page intentionally left blank.

## 4.17 Transportation

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | | | X | |
| b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | | | X | |
| c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | | X |
| d. Result in inadequate emergency access? | | | X | |

This section is based on the *Gardena U-Haul Zone Change, Conditional Use Permit, and Site Plan Review Project Transportation Memorandum* (Transportation Memorandum), prepared by Kittelson & Associates, dated October 7, 2021 and included in its entirety as Appendix G, Transportation Memorandum.

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

***Less Than Significant Impact.***

**Transit Facilities**

The Project site and surrounding area is served by GTrans, Torrance Transit, and LA Metro.

GTrans provides public transportation services in the South Bay, including the cities of Gardena, Hawthorne, Compton, Carson, Harbor City, Lawndale and Los Angeles. Within the Project vicinity, GTrans Line 4 operates along Van Ness Avenue, running from east Lawndale to the Harbor Gateway Transit Center. The closest stop to the Project site is located on west side of Van Ness Avenue just north of Rosecrans Avenue, less than 50 feet from the Project site. Line 4 typically operates on weekdays from approximately 5:45 AM to 7:00 PM with 40- to 60-minute headways (the time between bus arrivals).[16]

[16] GTrans, Route 4, http://ridegtrans.com/wp-content/uploads/2016/05/Line-4.pdf, accessed October 14, 2021.

Torrance Transit provides public transportation services in the City of Torrance and South Bay region, providing connections to Redondo Beach, Carson, Gardena, Hawthorne, Inglewood, El Segundo, Lawndale, Lomita, Compton, Wilmington, Harbor City and the City of Los Angeles. Within the Project area, Torrance Transit Line 5 operates along Van Ness Avenue from south Torrance to Inglewood. The closest stop to the Project site is located on the west side of Van Ness Avenue just north of Rosecrans Avenue, less than 50 feet from the Project site. Line 5 typically operates on weekdays from approximately 5:30 AM to 11 PM with 50- to 60-minute headways. On weekends, Line 5 operates from approximately 5:45 AM to 10 PM with 45- to 60-minute headways.[17]

LA Metro Route 125 operates between the Cities of Norwalk and El Segundo, traveling through the City of Gardena along Rosecrans Avenue, to the south of the Project site. Typically, Route 125 operates on weekdays from approximately 4:30 AM to 10:00 PM, with 15- to 25-minute headways; on Saturdays from approximately 5:00 AM to 9:15 PM and on Sundays and Holidays from approximately 6:00 AM to 8:45 PM with approximately 30-minute headways.

The Project would continue to be served by the existing transit system. As discussed in Response 4.14(a), the proposed Project is not anticipated to generate new residents. Employment-generating uses currently occur within the site. There are eight to nine part-time employees for the retail store and eight corporate employees. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated. At completion, the facility would be staffed with between ten and 15 employees, both full-time and part time, and eight corporate employees during the sales office hours (between 7:00 AM and 7:00 PM Monday through Thursday and Saturday, 7:00 AM and 8:00 PM on Friday, and 9:00 AM and 5:00 PM Sunday). Therefore, the Project would not conflict with a program plan, ordinance, or policy addressing transit and impacts would be less than significant.

**Roadway Facilities**

Van Ness Avenue and Rosecrans Avenue provide access to the Project site. According to the Gardena General Plan, Rosecrans Avenue is an arterial and Van Ness Avenue is a major collector roadway. An arterial roadway connects traffic from smaller roadways to freeway interchanges and reginal roadway corridors. They serve as the principal urban thoroughfares, provide a linkage between activity centers in the City to adjacent communities and other parts of the region, and provide intra-city mobility. A major collector roadway serves as an intermediate route to carry traffic between collector roadways and arterial roadways. The Project does not propose any changes to Rosecrans Avenue or Van Ness Avenue. Rosecrans Avenue provides three lanes of travel in each direction with a center landscaped median and dedicated turn lanes. Van Ness Avenue provides two lanes of travel in each direction with dedicated turn lanes.

The Project does not propose any modifications to Van Ness Avenue or Rosecrans Avenue. The Project would involve removal of two existing driveways along Rosecrans Avenue and construction of one driveway along Van Ness Avenue at the northwest portion of the Project site. Two of the driveways would

[17] Torrance Transit, Schedule Book, https://transit.torranceca.gov/Home/ShowDocument?id=66383, accessed October 14, 2021.

continue to function as right-in-right-out driveways. The driveway on Rosecrans Avenue would serve right-in-right-out access due to the raised median, and the southernmost driveway on Van Ness Avenue would continue to function as right-in-right-out due to the yellow centerline and the presence of the southbound left-turn lane for the Van Ness Avenue/Rosecrans Avenue intersection.

**Bicycle Facilities**

The City adopted the South Bay Bicycle Master Plan (Bicycle Master Plan), which is a multi-jurisdictional bicycle master plan intended to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the cities in the South Bay, including Gardena. The Bicycle Master Plan (Figure 4-3) identifies existing and proposed bicycle facilities within Gardena. According to the Bicycle Master Plan, a Class III Bicycle Lane exists along Van Ness Avenue, adjacent to the Project site. A Class III Bike Lane provides for shared-use with motor vehicles. The Project does not propose any modifications to Van Ness Avenue. The Project would involve removal of two existing driveways along Rosecrans Avenue and construction of one driveway along Van Ness Avenue at the northwest portion of the Project site. Two of the driveways would continue to function as right-in-right-out driveways. These improvements would not interfere or conflict with the existing Class III Bike Lane along the Project frontage. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated. The Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities and impacts would be less than significant.

**Pedestrian Facilities**

A sidewalk is currently provided along Van Ness Avenue and Rosecrans Avenue, adjacent to the Project site. As discussed above, the Project would involve removal of two existing driveways along Rosecrans Avenue and construction of one driveway along Van Ness Avenue at the northwest portion of the Project site. As part of the proposed driveway removal, the Project would reconstruct the curb/gutter and sidewalk along Rosecrans Avenue. The Project would also provide parkway landscaping and trees along the Project frontage. The Project would not conflict with a program, plan, ordinance or policy addressing pedestrian facilities and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

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

***Less Than Significant Impact.*** The City's *SB 743 Implementation Transportation Analysis Updates* (Transportation Analysis Guidelines), includes criteria for individual project screening, which can be used to screen projects that are expected to generate low vehicles miles traveled (VMT) out of a detailed VMT analysis. The City's three VMT screening criteria and determinations include:

- Project Type Screening: Projects that generate fewer than 110 daily trips, local-serving retail projects less than 50,000 square feet, and affordable housing projects may be screened from conducting a VMT analysis. As shown in Table 1 of the Local Transportation Assessment, the Project is expected to generate 120 net new daily trips. Since the Project would generate

approximately 120 daily trips and is not an affordable housing project, neither of these conditions would apply to this Project. However, the local-serving retail screening criterion does apply to the retail component of the Project since it is less than 50,000 square feet. Therefore, the Project's retail component can be screened out of requiring a detailed VMT analysis under the project type screening criteria.

- Transit Proximity Screening: Projects located within a High-Quality Transit Area (HQTA) would be screened from a detailed VMT analysis if the project does not have certain characteristics. According to Figure 3 in the City's Transportation Analysis Guidelines, the Project site is located within a frequent transit area. In addition, the Project would meet the other criteria necessary to screen out due to transit proximity. Therefore, the entirety of the proposed Project can be screened out of requiring a detailed VMT analysis under the transit proximity screening criteria.

- Low VMT Area Screening: Projects that are assessed using home-based VMT per resident (such as residential projects) or homebased work VMT per employee (such as offices) in a low-VMT generating area may be screened from a VMT analysis. According to Figure 2 in the City's Transportation Analysis Guidelines, the proposed Project is not located in an area that generates low VMT per employee. As such, this screening criteria would not apply to this Project.

To be screened out of a detailed VMT analysis, a project or project component would need to satisfy at least one of the VMT screening criteria. The Project's retail component meets the requirements for project type screening; in addition, the overall Project meets the requirements for transit proximity screening, meaning that the entirety of the Project is screened out of a detailed VMT analysis. Therefore, the Project would result in a less-than-significant VMT impact. Thus, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

***Mitigation Measures:*** No mitigation measures are required.

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

***No Impact.*** The Project proposes to remove an existing U-Haul facility and unoccupied restaurant building and construct a new, modern U-Haul facility. Thus, the Project would not introduce an incompatible use to the site. Further, the Project would not provide any off-site roadway improvements that could substantially increase hazards due to a design feature. The Project would involve removal of two existing driveways along Rosecrans Avenue and construction of one driveway along Van Ness Avenue at the northwest portion of the Project site. Two of the driveways would continue to function as right-in-right-out driveways. Prior to development, proposed improvements would be reviewed and approved by the City of Gardena to ensure that the Project conforms with applicable requirements and standards set forth in the Gardena Municipal Code, including providing site distance and safety standards. Thus, no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation measures are required.

***d) Result in inadequate emergency access?***

***Less Than Significant Impact.*** Van Ness Avenue and Rosecrans Avenue provide direct access to the Project site and would serve as a primary evacuation and emergency access route within the area. The construction and operation of the proposed Project would not place any permanent physical barriers on Van Ness Avenue or Rosecrans Avenue. There is the potential that one or more traffic lanes located immediately adjacent to the Project site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road Closure or Interference with Highway Use*. However, this would be temporary and emergency access to the Project site and surrounding area would be required to be maintained along Van Ness Avenue and Rosecrans Avenue at all times. Additionally, all construction staging would occur within the boundaries of the Project site and would not interfere with circulation along Van Ness Avenue, Rosecrans Avenue, or any other nearby roadways.

The Project does not propose any modifications to Van Ness or Rosecrans Avenues. The Project would involve construction of an additional 30-foot-wide driveway within the northern portion of the site, south of the parking spaces used by the post office. The Project proposes to remove two of the driveways on Rosecrans Avenue and to reconstruct the curb/gutter and sidewalk; the existing driveway at the southeast corner of the Project site would be maintained. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. The Los Angeles County Fire Department (LACFD) has reviewed the Project for access requirements, minimum roadway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the Project site. The Project would be required to comply with all applicable Building and Fire Code requirements and would submit construction plans to the Fire Department's Engineering Building Plan Check Unit for review and approval prior to issuance of any building permit. Approval by the Fire Department would ensure that Project construction and operation would not result in inadequate emergency access. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

This page intentionally left blank.

## 4.18 Tribal Cultural Resources

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. 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 | | X | | |
| 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | | X | | |

***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)?***

***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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

***Less Than Significant Impact with Mitigation Incorporated.*** As part of the Cultural Resources Assessment, a search of the Sacred Lands File (SLF) was requested from the Native American Heritage Commission (NAHC). The NAHC responded indicating the search was negative for any previously known tribal cultural resources or sacred lands within the Project area or immediate vicinity. As discussed in Section 4.5, Cultural Resources, the Cultural Resources Assessment determined the Project site has moderate sensitivity for prehistoric cultural resources and low to moderate sensitivity for buried historic-aged cultural resources such as foundations and trash deposits.

Assembly Bill (AB) 52 requires that lead agencies evaluate a project's potential impact on "tribal cultural resources", which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." AB 52 applies whenever a lead agency adopts an environmental impact report, mitigated negative declaration, or negative declaration.

AB 52 also establishes a formal consultation process for California tribes regarding tribal cultural resources. Under AB 52 the lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project". Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

In compliance with AB 52, the City provided formal notification to those California Native American Tribal representatives requesting notification in accordance with AB 52; refer to Appendix C, Tribal Consultation Communications. The Gabrieleno Band of Mission Indians – Kizh Nation and Gabrieleno-Tongva Tribe requested formal consultation with the City. In response to the request for consultation, the City engaged with both tribes, which included telephone and email correspondence.

Although no Native American tribal cultural resources are known to occur within the Project site, based on the Gabrieleno Band of Mission Indians – Kizh Nation's cultural affiliation with the area and the findings of the Cultural Resources Assessment, the parties agreed to impose mitigation measures to mitigate potential impacts to previously unidentified Native American tribal cultural resources.

Mitigation measures would require the retention of a qualified Native American Monitor who would be present during all construction related ground disturbances. In the event tribal cultural resources are unearthed, they would be evaluated by the Native American Monitor and if determined to be Native American in origin, appropriate treatment and curation of the resources would occur. Additionally, in coordination with Mitigation Measure CUL-3 (refer to Section 4.5, Cultural Resources), mitigation would address the potential discovery of human remains, providing for coordination with the Tribe and Qualified Archaeologist. With implementation of Mitigation Measures TCR-1, TCR-2, and TCR-3, the proposed Project would not cause a substantial adverse change in the significant of a tribal cultural resource and impacts would be reduced to a less than significant level.

***Mitigation Measures:***

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The Project Applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground- disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/City of Gardena upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the Project Applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh to the Project Applicant that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact Kizh TCRs.

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-2: Refer also to Mitigation Measure CUL-3 (Section 4.5, Cultural Resources)

Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods discovered or recognized on the Project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

TCR-3: Procedures for Burials and Funerary Remains. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe will

make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials will be removed.

In the event preservation in place is not possible despite good faith efforts by the Project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

The Tribe will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

This page intentionally left blank.

## 4.19 Utilities and Service Systems

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | | | X | |
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | | | X | |
| c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | X | |
| 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? | | | X | |
| e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | X | |

This section is based in part on the *Sewer Capacity Study for Proposed Redevelopment of the Existing U-Haul Site* (Sewer Study) prepared by West Yost, dated December 17, 2021, and included in its entirety as Appendix H, Sewer Study.

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

***Less Than Significant Impact.***

**WATER**

The Project site is currently served by the Golden State Water Company (GSWC). The Project proposes to remove the existing U-Haul facility and unoccupied restaurant and develop a new, modern U-Haul facility with self-storage, truck and trailer sharing, and retail sales. The Project proposes to connect to the existing water lines within and adjacent to the Project site; new water lines would be constructed on-site for fire water. Employment-generating uses currently occur within the site and due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not require the relocation or construction of new or expanded GSWC water facilities. The Project site is currently receiving water and existing infrastructure and supplies are available to serve the proposed redevelopment of the site. The potential environmental effects associated with construction and operation of the Project, including the proposed fire water infrastructure are analyzed within this Initial Study and impacts have been determined to be less than significant with compliance with regulatory requirements and implementation of mitigation measures. Thus, the proposed Project would not require or result in relocation or construction of water facilities, the construction or relocation of which could cause significant environmental effects.

Refer to Response 4.19(b) regarding water supply.

**WASTEWATER AND WASTEWATER TREATMENT**

The City of Gardena, along with the Los Angeles County Sanitation Districts (LACSD's), provide wastewater services to the Project site. The City of Gardena owns and operates local wastewater transmission lines. Wastewater is conveyed to LACSD's Joint Water Pollution Control Plant located in the City of Carson. As previously stated, the Project proposes to remove existing buildings and develop the site with a new self-storage facility, truck and trailer sharing, and retail sales. Employment-generating uses currently occur within the site and have been anticipated by the General Plan. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not require the relocation or construction of new or expanded wastewater facilities. The Project would connect to the existing sewer line within Van Ness Avenue. Existing wastewater lines located within Van Ness Avenue would remain unchanged and continue to serve the Project site. Thus, the proposed Project would not require or result in relocation or construction of wastewater facilities, the construction or relocation of which could cause significant environmental effects.

Refer to Response 4.19(c) below, regarding wastewater treatment.

**STORMWATER DRAINAGE**

Under proposed conditions, the Project would provide an underground stormwater treatment and detention system. Runoff within the northern portion of the site would sheet flow into two proposed catch basins, where the proposed underground stormwater system would carry the runoff into an underground stormwater treatment and detention system and ultimately outfall to a tie-in with an existing stormwater stub. Runoff within the southern portion of the site would sheet flow into proposed concrete valley gutters, which would carry runoff into proposed catch basins, where the proposed underground stormwater system would carry the runoff into underground stormwater treatment and

detention system and ultimately outfall in the existing public curb and gutter along Rosecrans Avenue via sump pump. No off-site drainage improvements are proposed. The potential environmental effects associated with construction and operation of the Project, including the proposed storm drain improvements to serve the development are analyzed within this Initial Study and impacts have been determined to be less than significant with compliance with regulatory requirements and implementation of mitigation measures. Thus, the proposed Project would not require or result in relocation or construction of stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects.

Refer to Section 4.10 regarding drainage patterns and the Project's proposed hydrology and drainage.

**ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS**

The Project site receives electrical power from Southern California Edison (SCE) and natural gas service from Southern California Gas (SoCalGas). Telecommunication services are provided by a variety of companies and are typically selected by the individual customer. Transmission lines/infrastructure for these services are provided within the Project area and currently serve on-site uses.

The Project's anticipated electricity demand would be approximately 826 MWh per year. The Project's anticipated natural gas demand would be approximately 7,336 therms per year; refer to Section 4.6 regarding an analysis of the Project's energy use. The Project would connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed. The potential environmental effects associated with the Project's energy demand are analyzed within this Initial Study and impacts have been determined to be less than significant. The proposed Project would not require or result in relocation or construction of electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

***Mitigation Measures:*** No mitigation measures are required.

***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.*** GSWC supplies water to the Project site. In order to determine GSWC's full buildout demands, GWSC coordinates with the cities within its service area on the respective cities' general planning, which takes into consideration future growth of undeveloped areas. According to GSWC's 2020 UWMP Tables 5-2 and 5-3 indicate water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2045.

The Project proposes to remove an existing U-Haul facility and unoccupied restaurant and develop a new, modern U-Haul facility. Although the Project would require a Zone Change from C-3 to C-4 and a CUP to allow for the self-storage component, the proposed development would primarily be an expansion of uses that occur within the site. Currently, there are eight to nine part-time employees for the retail store and eight corporate employees. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not require a significant increase in water demand. At completion, the facility would be staffed with between ten and 15 employees, both full-time and part time, and eight corporate employees during the sales office hours. Further, the introduction of self-storage to the site would not involve a significant

increase in water demand. Further, IRWD's GSWC's 2020 UWMP indicates adequate water supplies would be available to serve future water demands during normal, dry and multiple years, which includes water demand associated with the existing site. Thus, impacts to water supplies would be less than significant.

***Mitigation Measures:*** Less Than Significant Impact.

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

***Less Than Significant Impact.***

**WASTEWATER GENERATION**

The Project proposes to connect to existing sewer lines within the Project site, which would connect to an existing 24-inch reinforced clay pipe (RCP) sewer main adjacent to the Project site. One manhole (referred to herein as Manhole #1) was monitored at the southern end of the property near the intersection of Rosecrans and Van Ness Avenues, downstream of the point where proposed Project site flows would be contributed.

The existing sewer maximum flows were determined via monitoring of Manhole #1 from November 1 to November 9, 2021. Over the duration of monitoring, flow rate, velocity, and water level measurements were taken every 15 minutes; the tabular and graphical results from the manhole monitoring are provided in Attachment A of the Sewer Study included in Appendix H. Based on the monitoring data collected by US3, existing maximum flow for Manhole #1 was measured at 0.557 million gallons per day (mgd). The maximum water level was measured at 11.2 inches.

The Sewer System Management Plan for LACSD indicates that the County does not consider possible improvements to sewers until peak dry weather flow depth exceeds 70 percent of the pipe diameter, which is a depth-to-diameter (d/D) ratio of 0.7 as a basis for assessing the need for system improvements. Because of the infrequency of significant wet weather events in Los Angeles County and the resultant difficulty in obtaining wet weather data, these standards use a dry weather peak d/D threshold of 0.7 as a basis for assessing the need for system improvements. The existing flow in this pipe has a d/D ratio of 0.47, which falls well below the d/D standard of 0.7.

The Project proposes to remove the existing U-Haul facility and unoccupied restaurant and develop the site with a new, modern U-Haul facility with self-storage, truck and trailer sharing, and retail sales. Sewer flows that would be generated by the proposed Project were estimated using the Los Angeles County Sanitation District (LACSD) "Loadings for Each Class of Land Use" table. The analysis was performed by assigning the flow factors for Office and Warehousing land uses to the associated building square footage to determine the future maximum flow and depth-to-diameter ratio for the proposed development.

This analysis conservatively assumes that there is currently no flow being generated on the Project site. The proposed Project would contribute 0.010 mgd for a combined flow (existing plus Project) of 0.566 mgd and a water level of 11.31 inches. The results indicate that the additional flow from the proposed Project would have a minimal impact on flows in the existing 24-inch RCP sewer main adjacent to the proposed development, such that the d/D ratio of 0.47 remains nearly unchanged with the addition of

those flows. Accordingly, the existing sewer would have capacity to accommodate the proposed Project. Thus, the future flow rates produced by the proposed Project would not significantly impact or exceed the capacity of the existing sewer infrastructure. Impacts would be less than significant.

**WASTEWATER TREATMENT**

The wastewater generated by the proposed Project would be treated at LACSD's Joint Water Pollution Control Plant located in the City of Carson. The Plant has a capacity of 400 mgd and treats approximately 260 mgd of wastewater.18 The Project would have a maximum wastewater flow of approximately 6,040 gpd requiring treatment at the Joint Water Pollution Control Plant.

The design capacities of LACSD's facilities are based on the regional growth forecast adopted by SCAG. Expansion of LACSD's facilities must be sized and their service phased in a manner that is consistent with the SCAG regional growth forecast. Because SCAG growth projections are based in part on growth identified in local General Plans, growth associated with development of the Project site based on its General Plan land use designation has been anticipated by the growth forecasts. The Project proposes to remove an existing U-Haul facility and unoccupied restaurant and develop a new, modern U-Haul facility. Although the Project would require a Zone Change from C-3 to C-4 and a CUP to allow for the self-storage component, the proposed development would primarily be an expansion of uses that occur within the site. Currently, there are eight to nine part-time employees for the retail store and eight corporate employees. Due to the nature of the proposed use (self-storage facility, truck and trailer sharing, and retail sales) significant new employment opportunities would not be generated and would not result in a significant increase in wastewater requiring treatment. At completion, the facility would be staffed with between ten and 15 employees, both full-time and part time, and eight corporate employees during the sales office hours. Further, LACSD has the authority to charge a fee for the privilege of connecting to the LACSD's Sewage System for increasing the strength or quantity of wastewater discharged from connected facilities. The fee payment would be required before a permit to connect to the sewer is issued. Thus, adequate wastewater treatment would be available to serve the proposed Project and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are required.

***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?***

***e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

***Less Than Significant Impact.*** Waste Resources of Gardena (WRG) is the authorized waste hauler for the City, providing construction debris and other building materials removal, as well as commercial, industrial,

[18] Los Angeles County Sanitation Districts, *Facilities, Joint Water Pollution Control Plant*, https://www.app.lacsd.org/facilities/?tab=0&number=11, accessed October 14, 2021.

and residential refuse collection. Waste from Gardena is disposed of at a number of solid waste facilities, with the majority of waste disposed at the Chiquita Canyon Sanitary Landfill.

The Project proposes to remove an existing U-Haul facility and unoccupied restaurant and develop a new, modern U-Haul facility with a self-storage facility, truck and trailer sharing, and retail sales. State law requires a 65 percent diversion rate for construction and demolition projects. Gardena Municipal Code Chapter 8.20, *Solid Waste and Recyclable Collection and Disposal*, addresses solid waste disposal, including requirements for construction and demolition projects. In accordance with Gardena Municipal Code Section 8.20.060, *Solid waste disposal and diversion*, each construction and demolition project for which a building and/or demolition permit is applied for and approved must achieve the waste diversion performance standard or show a good faith effort to achieve that standard. Compliance with the Gardena Municipal Code would achieve compliance with State law.

Project implementation would increase solid waste disposal demands over existing conditions. Solid waste within the City is primarily disposed of at the Chiquita Canyon Sanitary Landfill located at located at 29201 Henry Mayo Drive, Castaic. In 2019, approximately 72 percent of solid waste from Gardena was disposed of at the Chiquita Canyon Sanitary Landfill; the El Sobrante Landfill and the Sunshine Canyon City/County Landfill received approximately 8.5 and 5.1 percent of solid waste from Gardena, respectively.[19] Chiquita Canyon Sanitary Landfill has a maximum permitted throughput of 12,000 tons per day. The facility's maximum capacity is 110,366,000 cubic yards and has a remaining capacity of 60,408,000 cubic yards.[20] It is anticipated that Chiquita Canyon Sanitary Landfill would continue to receive a majority of the solid waste from the City. Solid waste generated from the Project could be accommodated at the Chiquita Canyon Sanitary Landfill or a combination of the disposal facilities currently receive solid waste for disposal from the City.

The City has a per capita disposal rate target of 8.0 pounds per person per day. Since 2012, the City has met this target through its diversion programs with the exception of 2019, in which the disposal rate was 8.7 pounds per person per day.[21] The most recent disposal rate (2020) was 7.6 pounds per person per day. The City would continue to implement its diversion programs and require compliance with all federal, State and local statutes and regulations for solid waste, including those identified under the most current CalGreen standards and in compliance with AB 939 and SB 1383. Thus, the proposed Project would result in less than significant impacts concerning solid waste.

***Mitigation Measures:*** No mitigation measures are required.

[19] CalRecycle, Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed October 14, 2021.
[20] CalRecycle, SWIS Facility/Site Activity Details, Chiquita Canyon Sanitary Landfill (19-AA-0052), https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037, accessed October 14, 2021.
[21] CalRecycle, Jurisdiction Review Reports, https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports, accessed October 14, 2021.

## 4.20 Wildfire

| *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | | X |
| 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? | | | | X |
| 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? | | | | X |
| 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? | | | | X |

***a) Substantially impair an adopted emergency response plan or emergency evacuation plan?***

***No Impact.*** According to the Cal Fire Hazard Severity Zone Map, the City of Gardena, including the Project site, is not located within a State Responsibility Area (SRA).[22] Further, the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA).[23] The Project would be required to comply with all City and LACFD requirements for fire prevention and safety measures, including site access.

[22] Cal Fire, Fire Hazard Severity Zone Maps, *Fire Hazard Severity Zones in SRA*, https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed October 14, 2021.
[23] Cal Fire, Fire Hazard Severity Zone Maps, *Very High Fire Hazard Severity Zones in LRA*, https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed October 14, 2021.

The Project does not propose any modifications to Van Ness Avenue or Rosecrans Avenue. The Project would involve removal of two existing driveways along Rosecrans Avenue and construction of one driveway along Van Ness Avenue at the northwest portion of the Project site. Two of the driveways would continue to function as right-in-right-out driveways. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. LACFD would review the Project for access requirements, minimum roadway widths, fire apparatus access roads, fire lanes, signage, access devices and gates, access walkways, among other requirements to ensure adequate emergency access would be provided to and within the Project site.

Van Ness Avenue and Rosecrans Avenue would continue to serve as primary evacuation and emergency access routes within the area. The construction and operation of the proposed Project would not place any permanent physical barriers that could obstruct either street. There is the potential that the traffic lanes located immediately adjacent to the Project site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary closure would be required to receive permission from the traffic authority in accordance with Gardena Municipal Code Section 13.56.430, *Road Closure or Interference with Highway Use*. However, this would be temporary and emergency access to the Project site and surrounding area would be required to be maintained along Van Ness Avenue and Rosecrans Avenue at all times. Additionally, all construction staging would occur within the boundaries of the Project site and would not interfere with circulation along Van Ness Avenue or Rosecrans Avenue, or any other nearby roadways. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant in this regard.

***Mitigation Measures:*** No mitigation measures are required.

***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.*** As discussed above, the Project site is not located within a SRA and is not located within a VHFHSZ within a LRA. The Project site is relatively flat and does not contain any slopes or features that would exacerbate wildfire risks. No impact would occur in this regard.

***Mitigation Measures:*** No mitigation measures are required.

***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.*** As discussed above, the Project site is not located within a SRA and is not located within a VHFHSZ within a LRA. The Project site is located within an urbanized area, surrounded by existing development and associated infrastructure. The Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment.

***Mitigation Measures:*** No mitigation measures are required.

***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.*** As discussed above, the Project site is not located within a SRA and is not located within a VHFHSZ within a LRA. Further, the Project site and surrounding area is relatively flat. There are no adjacent rivers or bodies of water relative to the Project site. The Project would not expose people or structures to significant risk associated with wildfires, flooding, or landslides.

***Mitigation Measures:*** No mitigation measures are required.

This page intentionally left blank.

## 4.21 Mandatory Findings of Significance

| *Would the project:* | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | | X | | |
| b. Does the project have impacts that are individually limited, but cumulatively considerable?<br>("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | | X | | |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | X | | |

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

***Less Than Significant Impact With Mitigation Incorporated.*** As discussed throughout this Initial Study, the Project does not have the potential to substantially degrade the quality of the environmental or result in significant environmental impacts that cannot be reduced to a less than significant level with compliance with the established regulatory framework and implementation of mitigation measures and standard conditions of approval.

As discussed in Section 4.4, Biological Resources, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten

to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The Project would be required to implement Mitigation Measure BIO-1 to address the potential for nesting migratory birds within the trees if proposed to be removed as part of the Project, which would reduce potential impacts to a less than significant level.

As discussed in Section 4.5, Cultural Resources, the Project would not eliminate important examples of the major periods of California history or prehistory. As also concluded in Section 4.5 and Section 4.18, Tribal Cultural Resources, the Project is not anticipated to result in impacts to known cultural or tribal cultural resources. However, in the unlikely event that buried archaeological resources are encountered during ground disturbance activities, Mitigation Measures CUL-1 and CUL-2 would require all Project construction efforts to halt until a qualified archaeologist can evaluate the find. Mitigation Measure TCR-1 would ensure a Tribal Monitor is present during site disturbance activities having the potential to unearth tribal cultural resources and, if discovered, Mitigation Measure TCR-2 would ensure activities in the vicinity of the find are halted and appropriate evaluation and treatment of any potential resources occurs. The Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with the implementation of mitigation.

***Mitigation Measures:*** No additional mitigation measures are required.

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

***Less Than Significant Impact with Mitigation Incorporated.*** Based on the analysis contained in this Initial Study, the proposed Project would not have cumulatively considerable impacts with implementation of Project mitigation measures. Implementation of standard conditions and mitigation measures at the Project-level would reduce the potential for the incremental effects of the proposed Project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

***Mitigation Measures:*** No additional mitigation measures are required.

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

***Less Than Significant Impact with Mitigation Incorporated.*** Previous sections of this Initial Study reviewed the proposed Project's potential impacts to human beings related to several environmental topical areas. As determined throughout this Initial Study, the proposed Project would not result in any potentially significant impacts that cannot be mitigated or reduced with implementation of mitigation measures and/or standard conditions imposed by the City. The Project would not cause a substantial adverse effect on human beings, either directly or indirectly and impacts would be less than significant.

***Mitigation Measures:*** No additional mitigation measures are required.

# 5.0 REFERENCES

Ahrens, Donald C., Meteorology Today: An Introduction to Weather, Climate, & the Environment, 2006.

California Air Resources Board, *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*, October 2000, https://www.arb.ca.gov/diesel/documents/rrpFinal.pdf

California Air Resources Board, *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*, November 2017, https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

California Air Resources Board, *EMFAC2021 Emissions Inventory*, https://arb.ca.gov/emfac/emissions-inventory/afebd6c97a08fe51c276baebdf9958ae875b65fc

California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/agriculture/, accessed October 19, 2021.

California Department of Toxic Substance Control, *EnviroStor, Hazardous Waste and Substances Site List*, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed January 27, 2022.

California Department of Transportation, Scenic Highway System Lists, List of Eligible and Officially Designated State Scenic Highways and List of Officially Designated County Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed October 19, 2021.

California Department of Water Resources, *SGMA Groundwater Management*, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed October 20, 2021.

California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004 (CEC-600-2006-013-SF.)*, http://web.archive.org/web/20170323185651/http:/www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF

California Energy Commission, *2013 California Energy Efficiency Potential and Goals Study*, Appendix Volume 1, August 15, 2013.

California Energy Commission, *2018 Power Content Label for Southern California Edison*, https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Southern_California_Edison.pdf

California Energy Commission, *California Greenhouse Gas Emission Inventory – 2019 Edition*, https://www.arb.ca.gov/cc/inventory/data/data.htm

California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed October 18, 2021.

California Energy Commission, *Natural Gas Consumption by County*, http://www.ecdms.energy.ca.gov/gasbycounty.aspx, accessed October 18, 2021.

California Energy Commission, *2019 Building Energy Efficiency Standards*, https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf, accessed October 18, 2021.

California State Water Resources Control Board, *Phase I MS4 Permits, Region 4, County of Los Angeles and the Incorporated Cities Therein except the City of Long Beach – Order No. R4-2012-0175 as amended by WQ Order 2015-0075*, https://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_i_municipal.html, accessed October 20, 2021.

CalFire, *Fire Hazard Severity Zones in SRA*, https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed October 14, 2021.

CalFire, *Very High Fire* H*azard Severity Zones in LRA*, https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed October 14, 2021.

CalRecyle, *Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed October 14, 2021.

CalRecycle, *SWIS Facility/Site Activity Details, Chiquita Canyon Sanitary Landfill (19-AA-0052)*, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037, accessed October 14, 2021.

CalRecycle, *Jurisdiction Review Reports*, https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports, accessed October 14, 2021

City of Gardena, Climate Action Plan, 2017, https://www.cityofgardena.org/development-and-planning/

City of Gardena*, Gardena General Plan 2006*, April 2006.

City of Gardena, *Gardena General Plan 2006 Final Environmental Impact Report, SCH# 2005021125*, April 2006.

City of Gardena, *GTrans Route & Schedule Guide*, http://ridegtrans.com/wp-content/uploads/2016/05/Line-4.pdf, accessed October 14, 2021.

Federal Emergency Management Agency, *Flood Insurance Rate Map 06037C1795F*, effective September 26, 2008, https://msc.fema.gov/portal/home, accessed October 20, 2021.

Golden State Water Company, *Southwest Service Area 2020 Urban Water Management Plan*, Adopted July 15, 2021.

Golden State Water Company, Southwest, https://www.gswater.com/southwest, accessed October 14, 2021.

Intergovernmental Panel on Climate Change, "Climate Change 2013: The Physical Science Basis, Summary for Policymakers.", http://www.climatechange2013.org/images/report/WG1AR5_SPM_FINAL.pdf

Kimley-Horn, *Low Impact Development Plan, U-Haul Gardena*, August 25, 2021, Revised March 10, 2022.

Kimley-Horn, *U-Haul Gardena – Hydrology Memorandum*, March 10, 2022.

Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition, *The South Bay Bicycle Master Plan*, August 2011.

Los Angeles County Metropolitan Transportation Authority, *125 Route Map*, https://media.metro.net/documents/75fcba26-5702-4126-8c37-d3066bd918df.pdf, accessed October 14, 2021.

Los Angeles County Sanitation Districts, *Facilities, Joint Water Pollution Control Plant*, https://www.lacsd.org/facilities/?tab=2&number=11, accessed October 14, 2021.

Los Angeles Unified School District, *Resident School Identifier*, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed October 14, 2021.

South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#

South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, June 2003, Revised July 2008. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

South Coast Air Quality Management District, *Localized Significance Thresholds Methodology – Appendix C*, Revised October 21, 2009.

South Coast Air Quality Management District, *Final 2016 AQMP*, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp

Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016, http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx

Torrance Transit Administration, *Torrance Transit Schedule Book (Effective June 27, 2021)*, https://transit.torranceca.gov/Home/ShowDocument?id=66383, accessed October 14, 2021.

United States Environmental Protection Agency (U.S. EPA), *Climate Change Indicators in the United States: Global Greenhouse Gas Emissions*, Updated May 2014, www.epa.gov/climatechange/indicators

West Yost, *Sewer Capacity Study for Proposed Redevelopment of the Existing U-Haul Site*, December 17, 2021.

# 6.0 REPORT PREPARATION PERSONNEL

**City of Gardena (Lead Agency)**

1700 West 162nd Street
Gardena, California 90247
310-217-9530

*Greg S. Tsujiuchi, Community Development Director*
*Amanda Acuna, Senior Planner*

**De Novo Planning Group (Environmental Consultant)**

180 East Main Street, Suite 108
Tustin, California 92780
949-396-8193

*Starla Barker, AICP, Principal Planner*
*Ashley Brodkin, Senior Planner*
*Josh Smith, AICP, Senior Planner*
*Erik Anderson, Assistant Planner*
*Courtney Marchi, Assistant Planner*

**Technical Specialists**

Cogstone (Cultural and Paleontological Resources)
1518 West Taft Avenue
Orange, California 92865

Fuscoe Engineering (Hydrology/LID Peer Review)
16795 Von Karman, Suite 100
Irvine, California 92606

Kittelson & Associates (Transportation)
750 The City Drive, Suite 410
Orange, California 92868

Kimley-Horn and Associates, Inc. (Hydrology/LID)
1100 W. Town and Country, Suite 700
Orange, California 92868

Leighton (Geology)
17781 Cowan
Irvine, California 92614

MD Acoustics (Noise)
1197 Los Angeles Avenue, Suite C-256
Simi Valley, California 93065

Ninyo & Moore (Geology)
475 Goddard, Suite 200
Irvine, California 92618

West Yost (Sewer)
1001 Galaxy Way, Suite 310
Concord, California 94520