

DRAFT
ENVIRONMENTAL IMPACT REPORT
SCH # 2023050241

NORMANDIE CROSSING SPECIFIC PLAN PROJECT

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An architectural rendering of a modern multi-story apartment complex. The central courtyard features a rectangular swimming pool with a wooden deck, lounge chairs, and a small tree. The buildings have balconies and large windows. In the foreground, there are rooftop decks with wooden flooring and outdoor furniture. The text "TABLE OF CONTENTS" is overlaid in the center of the image.

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An architectural rendering of a modern, multi-story apartment building. The building features a mix of light-colored facades and dark window frames. Each floor has a balcony with a glass railing. In the center of the building is a rooftop pool area with a wooden deck, lounge chairs, and a small tree. The pool is surrounded by a glass safety fence. In the foreground, there are several rooftop terraces with wooden decking and some greenery. The overall scene is bright and clear, suggesting a sunny day.

ES EXECUTIVE SUMMARY



ES Executive summary

ES.1 INTRODUCTION

This document is an Environmental Impact Report (EIR) prepared for the City of Gardena (City) in compliance with CEQA. This EIR evaluates the potential environmental impacts associated with planning, constructing, and operating the proposed Normandie Crossing Specific Plan Project (the “Project” or “proposed Project”). The Project would develop up to 403 dwelling units (DUs) and adopt the Normandie Crossing Specific Plan (herein referred to as “Specific Plan” or “NCSP”). The proposed Specific Plan would establish site specific zoning regulations and development standards for the area, which would accommodate the proposed number of dwelling units. The Specific Plan includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. In addition to the Zoning Code Text Amendment, the Project seeks approval of the following entitlements: Zone Change/Map Amendment; General Plan/Map Amendment; Site Plan Review; Development Agreement; Vesting Tentative Tract Map TTM #; Affordable Housing Agreement; Environmental Assessment; and EIR certification.

ES.2 PROJECT LOCATION AND SETTING

The Project site is in the City of Gardena (City), which encompasses approximately 6.0 square miles in the County’s South Bay region. The City is approximately 12 miles southwest of downtown Los Angeles. The approximately 5.25-acre Project site is comprised of four parcels (APNs 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west.

Regional access to the Project site is provided via four major freeways: I-105 to the north; I-405 to the south and east; and I-110 and SR-91 (becomes West Artesia Boulevard) to the east. From I-105, access to the Project site is provided via Vermont Avenue, from I-405, access is provided via South Normandie Avenue, from I-110, access is provided via Artesia Boulevard at the City’s northern portion, which intersects with Normandie Avenue, and from SR-91, access is provided via Artesia Boulevard in the City’s southern portion, which intersects with Normandie Avenue. Local access is also provided via the following:

- Normandie Avenue, which is a four-lane Major Collector oriented north-south to the west of the Project site.
- Brighton Way, which is a two-lane alleyway classified as a Local Street oriented north-south and forms the Project site’s western boundary.
- West 169th and West 170th Streets are two-lane Local Streets oriented east west and form the Project site’s northern and southern boundaries, respectively.



ES.3 PROJECT CHARACTERISTICS SUMMARY

The Project proposes the construction and operation of a residential development comprised of 403 dwelling units (DU). The Project would construct two subareas – an apartment portion and a townhomes portion – connected by internal streets. The following proposed land uses would be developed in each sub area:

- Apartments (Subarea A); See **Table 2-5: Land Use Summary – Proposed Apartment Building**
 - A single 7 story, 90-foot tall 308,308-SF apartment building with 328 DU at a density of approximately 155 DU/AC
 - Minimum 50 SF of private open space per DU
 - 22,698 SF of common open space
- Townhomes (Subarea B); See **Table 2-6: Land Use Summary – Proposed Townhomes**
 - Nine townhome buildings with 75 3-story, 40-foot-tall townhomes totaling 120,673 SF at a density of approximately 24 DU/AC
 - 50 SF private open space per DU
 - 7,645 SF of common open space

The Project is designed to be residential development with a variety of housing types, and common open spaces. The apartment subarea common open space includes a swimming pool, a dog park, fitness room, club houses, and a courtyard; and the townhomes subarea common open space includes a swimming pool, dog park, club house, and paseos with seating areas.

The Project proposes 568 vehicle, and 173 bicycle parking spaces as follows:

- Apartments (Subarea A)
 - Level 1
 - Bicycle Parking, 173 spaces
 - Vehicle Parking, 204 spaces
 - Level 2
 - Vehicle Parking, 204 spaces
- Townhomes (Subarea B)
 - Approximately 160 vehicle parking spaces
 - 150 spaces in attached garages
 - 10 guest spaces



Additionally, the Project proposes offsite improvements/actions as described below:

- Sidewalk improvements
- Various railroad improvements on South Normandie Avenue, including the removal of 1,000 linear feet of railroad spur track.
- Redesignate the residential parcel at 16964 179th Street from Industrial to Single Family Residential and rezone from General Industrial Zone (M-2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.
- Redesignate the adjacent Union Pacific Railroad Parcel from Industrial to Public/Institutional and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use.

The Project construction is anticipated to occur in a single phase over approximately 3.5 years, beginning June 2024 and ending September 2027. Phased occupancy of the proposed Project would be permitted, provided all occupiable areas are deemed safe for fire and life safety purposes. Grading for the Project would require cut and fill, which would include export. The Project site would be graded to match the existing grading and drainage patterns. The overall site grading and drainage pattern would be southeasterly towards Normandie Avenue.

ES.4 PROJECT OBJECTIVES

Pursuant to State CEQA Guidelines § 15124(b), the EIR Project description must include “[a] statement of objectives sought by the proposed project...The statement of objectives should include the underlying purpose of the Project.”

The Project objectives are:

- Diversify the City of Gardena’s existing housing options, by providing a range of housing types and sizes, to serve the region’s growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.
- Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.
- Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
- Establish housing development that meets high standards of design and pursues environmental sustainability.
- Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City’s Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.



ES.5 SIGNIFICANT UNAVOIDABLE IMPACTS

Based on the analysis contained in **Section 4: Environmental Impact Analysis** of this Draft EIR, the Project would have a significant unavoidable impact concerning construction noise; see **Section 4.9.6: Significant Unavoidable Impacts**.

ES.6 ALTERNATIVES TO THE PROJECT

CEQA states that an EIR must address “a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” [14 Cal. Code of Reg. 15126.6(a)]. As described in **Section 6.0: Alternatives to the Proposed Project** of this DEIR, three project alternatives were identified and analyzed for relative impacts as compared to the Project:

- “No Project/No Construction” Alternative;
- “No Project/Existing Land Use Designation” Alternative; and
- “Reduced Density” Alternative.

“NO PROJECT/NO CONSTRUCTION” ALTERNATIVE

The No Project/No Construction Alternative would retain the Project site in its current condition. The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. Approximately 115,424 square feet (SF) of industrial floor area is present on the Project site, however, only 106,100 SF of industrial uses are currently operational. Under this Alternative, the existing industrial uses would continue to operate and none of the proposed Project improvements would be implemented. Further, the Project’s requested entitlement (i.e., General Plan/General Plan Map Amendment (GPA #3-21), Zone Change and Zone Map Amendment (ZC #4-21), Zoning Text Amendment (ZTA #6-21), Normandie Crossing Specific Plan (NCSP) (SP #1-21), Site Plan Review (SPR #11-21), Vesting Tentative Tract Map (TTM #4-21), Development Agreement (DA #2-21), and CPUC General Order 88-B Permit) would not be granted.

“NO PROJECT/EXISTING LAND USE DESIGNATION” ALTERNATIVE

This Alternative consists of a “No Project” condition whereby the Project would not proceed, but rather the Project site is redeveloped pursuant to the existing General Plan land use designation. **Table 2-2: Existing Land Use Designations and Zoning** identifies the GGP land use designations for the Project site and indicates the Project site is designated Industrial, which provides for a wide range of industries, technology-related uses and supporting facilities, and business parks. Additionally, the GGP assigns a High Density 30 Overlay to the northern approximately 1.4 acres of the Project site. Based on the existing Industrial land use designation, the Project site’s maximum development capacity is approximately 228,690 SF of industrial floor area. It is noted, although the High Density 30 Overlay on the Project site’s northerly 1.4 acres would allow



development of residential uses, only industrial uses would be allowed on the site's southerly portion. Also, because no roadway or other buffer would exist between these two areas, this Alternative assumes no residential development on the Project site. Therefore, this Alternative assumes demolishing the existing 115,424 SF of industrial uses and in their place constructing up to 228,690 SF of industrial uses. Given that the Industrial land use designation is intended for a wide range of industrial uses, and since the Project site is surrounded by residential uses, this Alternative assumes development of an industrial business park, which could include any uses permitted within the Industrial zone; see GMC §18.36.020. Additionally, because the proposed access driveways under this Alternative are unknown, it is unknown whether it, like the Project, would require offsite railroad improvements pursuant to California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines.

"REDUCED DENSITY" ALTERNATIVE

The Reduced Density Alternative assumes development of the Project site similar to the proposed Project. The townhomes would remain unchanged; however, for purposes of this Alternative, the apartment building would be reduced to 192 DUs (from 328) and the building height would be reduced to five stories (from seven stories). This Alternative proposes a total of 267 DU, or approximately 34 percent fewer DU than the Project, and would reduce the density to 51 DU/AC. Thus, with fewer total units, the Applicant would not be able to provide affordable housing. Additionally, it is assumed that the access driveways would be the same under this Alternative, thus, similarly to the Project, this Alternative would require offsite railroad improvements pursuant to CPUC standards and UPRR guidelines.

ES.7 AREAS OF CONTROVERSY

This Draft EIR discusses environmental impacts that would occur as a result of implementing the proposed Project. This Draft EIR also includes proposed mitigation measures that have been identified to reduce or avoid significant effects that would result from the construction and operation of the proposed on-site uses. CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (City of Gardena) be stated in the EIR summary. The following discussion identifies issues raised by other agencies and the public during the 30-day public comment period of the NOP.

The following issues were raised during the commenting period of the NOP. These issues will be examined in the cited sections of this Draft EIR.

- Project-related impacts on Air Quality and Greenhouse Gas Emissions; see **Section 4.1: Air Quality** and **Section 4.5: Greenhouse Gas Emissions**
- Project proximity to the existing railroad right-of-way; see **Section 4.6: Hazards and Hazardous Materials**
- Project-related traffic causing congestion and excess noise on local roads; see **Section 4.13: Transportation** and **Section 4.9: Noise**



- Project-related impacts on utilities; see **Section 4.15: Utilities and Service Systems**
- Project-related impacts on local services; see **Section 4.11: Public Services**
- Project's visual character; see **Section 4.16: Aesthetics**

ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The following table is a summary of impacts and proposed mitigation measures and conditions of approval associated with the Project as identified in this Draft EIR. Refer to **Section 4.1** through **Section 4.16** for a detailed description of the environmental impacts and mitigation measures for the Project.



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.1: Air Quality			
Impact 4.1-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.1-2: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.1-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.1-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 4.2: Cultural Resources			
Impact 4.2-1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	No impact	No mitigation is required.	No Impact



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
<p>Impact 4.2-2: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?</p>	<p>Potentially Significant</p>	<p>MM CUL-1: Inadvertent Discovery of an Archaeological Resource. Before ground disturbing activities are initiated on the Project site, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site’s history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction.</p> <p>If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.</p> <p>See also MM TCR-1, MM TCR-2, MM TCR-3 below.</p>	<p>Less Than Significant</p>
<p>Impact 4.2-3: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?</p>	<p>Potentially Significant</p>	<p>See MM TCR-2 below.</p>	<p>Less Than Significant</p>



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.3: Energy			
Impact 4.3-1: Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.3-2: Would the Project conflict with or obstruct state or local plan for renewable energy or energy efficiency?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 4.4: Geology, Soils and Paleontological Resources			
Impact 4.4-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	<p>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.</p> <p>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. Auguring, potholing, and pile driving activities do not</p>	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<p>need to be monitored as these activities are unlikely to produce significant fossil because information about formation, depth, or context is impossible to discern. Should similar activities be planned, the qualified paleontologist shall be consulted prior to commencement so they may determine if that activity requires monitoring.</p> <p>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.</p> <p>MM GEO-1: Monitor for Paleontological Resources. Monitoring shall be conducted by a Paleontological Monitor, defined as one who meets the SVP standards for a Paleontological Resource Monitor. The Paleontological Monitor shall be under the supervision of the Project Paleontologist. A Project Paleontologist shall prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive</p>	



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		geologic sediments that occur in previously undisturbed sediment, which has been estimated as any portion of the Project site where excavation exceeds 0.9 m (3.0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated.	
Section 4.5: Greenhouse Gas Emissions			
<p>Impact 4.5-1: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?</p> <p>Impact 4.5-2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?</p>	Less Than Significant	No mitigation is required.	Less Than Significant
Section 4.6: Hazards and Hazardous Materials			
Impact 4.6-1: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant	<p>COA HAZ-1: Asbestos Survey. Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations.</p> <p>COA HAZ-2. If paint is separated from building materials</p>	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<p>(chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. A portable, field X-ray fluorescence (XRF) analyzer shall be used to identify the locations of potential lead paint, and test accessible painted surfaces. The qualified Environmental Professional shall identify the likelihood that lead is present in concentrations greater than 1.0 milligrams per square centimeter (mg/cm²) in/on readily accessible painted surfaces of the buildings.</p> <p>If lead-based paint is found, a qualified Lead Specialist shall complete abatement prior to any activities that would create lead dust or fume hazard. Potential methods to reduce lead dust and waste during removal include wet scraping, wet planning, use of electric heat guns, chemical stripping, and use of local High-Efficiency Particulate Air (HEPA) exhaust systems. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, §1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Engineer.</p> <p>MM HAZ-1: Construction Management Plan. Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.</p>	



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<p>MM HAZ-2: Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. The impermeable vapor membrane shall not underlay non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.</p>	
Section 4.7: Hydrology and Water Quality			
Impact 4.7-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.7-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.7-3: Would the Project substantially alter the existing	Less Than Significant	No mitigation is required.	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
<p>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:</p> <ul style="list-style-type: none"> i. Result in substantial erosion or siltation on- or off-site? ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? Or iv. Impede or redirect flood flows? 			
<p>Impact 4.7-4: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.8: Land Use and Planning			
Impact 4.8-1: Would the Project cause a significant environmental impact due to a conflict with any Gardena General Plan 2006 land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.8-2: Would the Project cause a significant environmental impact due to a conflict with any Gardena Municipal Code land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.8-3: Would the Project cause a significant environmental impact due to a conflict with any Connect SoCal 2020-2045 RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation is required.	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.9: Noise			
Impact 4.9-1: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant	<p>MM NOI-1: Construction Equipment Noise. Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.</p> <p>MM NOI-2: Construction Noise. A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.</p>	Significant and Unavoidable Impact
Impact 4.9-2: Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?	Potentially Significant	<p>MM NOI-3: Construction Vibration Impacts. The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 Brighton Avenue).</p>	Less Than Significant
Section 4.10: Population and Housing			
Impact 4.10-1: Would the Project induce substantial unplanned population growth in an area, either directly (for	Less Than Significant	No mitigation is required.	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			
Section 4.11: Public Services			
Impact 4.11-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.11-2: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the	Less Than Significant	No mitigation is required.	Less Than Significant



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Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
<p>construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?</p>			
<p>Impact 4.11-3: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Impact 4.11-4: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
<p>which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library facilities?</p>			
<p>Section 4.12: Recreation</p>			
<p>Impact 4.12-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental park facilities, need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Impact 4.12-2: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical</p>	<p>Potentially significant</p>	<p>See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.</p>	<p>Less Than Significant</p>



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
<p>deterioration of the facility would occur or be accelerated? Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</p>			
<p>Section 4.13: Transportation</p>			
<p>Impact 4.13-1: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Impact 4.13-2: Would the Project conflict or be inconsistent with State CEQA Guidelines § 15064.3, subdivision (b)?</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Impact 4.13-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	<p>Less Than Significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Impact 4.13-4: Would the Project result in inadequate emergency access?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 4.14: Tribal Cultural Resources			
<p>Impact 4.14-1: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:</p> <p>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or</p> <p>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant</p>	Potentially Significant	<p>MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The Applicant/lead agency 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.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency 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.</p> <p>C. The monitor will 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 will identify and describe any discovered TCRs, including but not limited to, Native American cultural and</p>	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
<p>pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</p>		<p>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 will be provided to the Applicant/lead agency upon written request to the Tribe.</p> <p>D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency 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 monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.</p> <p>E. Upon discovery of any TCRs or archaeological resources, 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 monitor and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (National Park Service 1983).</p> <ul style="list-style-type: none"> If the resources are Native American in origin, 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. 	



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<ul style="list-style-type: none"> If the archaeologist determines that the resource contains a “historical resource” or “unique archaeological resource,” time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be made available. The treatment plan shall be in accordance with CEQA Guidelines § 15064.5(f) for historical resources and Public Resources Code § 21083.2(b) for unique archaeological resources. If not left in place, any historic or archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum at the University of California Los Angeles, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society for educational purposes. <p>MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.</p> <p>A. 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 § 5097.98, are also to be treated according to this statute.</p> <p>B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County</p>	



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<p>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 § 5097.98 shall be followed.</p> <p>C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2).</p> <p>D. 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 monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).)</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p> <p>MM TCR-3: Procedures for Burials and Funerary Remains. This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant (“MLD”) by the NAHC:</p> <p>A. 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</p>	



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<p>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.</p> <p>B. 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.</p> <p>C. 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.</p> <p>D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should 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.</p> <p>E. In the event preservation in place is not possible despite good faith efforts by the 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</p>	



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		<p>footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects.</p> <p>F. 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.</p> <p>G. 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.</p>	
Section 4.15: Utilities and Service Systems			
Impact 4.15-1: Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction or	Potentially Significant	See MM GEO-1, MM CUL-1, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, MM NOI-3, MM TCR-1, MM TCR-2, and MM TCR-3.	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
relocation of which could cause significant environmental effects?			
Impact 4.15-2: Would the Project require or result in the relocation or construction of new or expanded wastewater conveyance/ wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?	Potentially Significant	See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.	Less Than Significant
Impact 4.15-3: Would the Project require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?	Potentially Significant	See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.	Less Than Significant
Impact 4.15-4: Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant	No mitigation is required.	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Impact 4-15.5: Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.15-6: Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.15-7: Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Impact 4.15-8: Would the Project comply with federal, state, and local management and reduction statutes and	Less Than Significant	No mitigation is required.	Less Than Significant



Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
regulations related to solid waste?			
Section 4.16: Aesthetics			
Impact 4.16-1: If an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.16-2: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant	No mitigation is required.	Less Than Significant



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An architectural rendering of a modern, multi-story apartment building. The building features a mix of light beige and grey facades with large windows and balconies. In the center, there is a rooftop pool area with a wooden deck, lounge chairs, and a glass safety fence. The pool is surrounded by greenery and small trees. In the foreground, there are several rooftop terraces with wooden decking and outdoor furniture. The overall scene is bright and clear, suggesting a sunny day.

1.0 INTRODUCTION



1.0 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code §21000 et seq. specifies that before a public agency decides to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the Project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This document is an Environmental Impact Report (EIR) prepared for the City of Gardena (herein referred to as the "City") in compliance with CEQA. This EIR evaluates the potential environmental impacts associated with planning, constructing, and operating the proposed Normandie Crossing Specific Plan Project (hereafter, the "Project" or "proposed Project"). The Project would develop up to 403 dwelling units (DUs) and adopt the Normandie Crossing Specific Plan (herein referred to as "Specific Plan"). The State CEQA Guidelines are included within California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, §§15000-15387, while the CEQA Statute is codified as Public Resources Code §§21000-21189.57.

This EIR evaluates the potentially significant, adverse, and beneficial environmental impacts resulting from Project implementation. **Section 2.0: Project Description** details the Project's location, environmental setting, background and history, characteristics, discretionary actions, goals/objectives, construction schedule/phasing, agreements, and required permits and approvals. **Section 3.0: Basis of Cumulative Analysis** outlines both the geographic context and list of cumulative projects which will be analyzed for cumulative analysis in **Section 4.0: Environmental Impact Analysis**. **Section 4.0: Environmental Impact Analysis** discusses the Project's affected environment, regulatory framework, environmental impacts, and mitigation measures. Following public review of the Draft EIR, a Final EIR will be prepared, in which the City will respond to public comments on the Draft EIR.

1.1 PURPOSE OF THE EIR

According to State CEQA Guidelines §15121, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a proposed project. This EIR's purpose is to inform decision-makers and the public of the proposed Project's environmental effects, provide environmental information sufficient to evaluate the proposed Project and its potential to cause significant environmental effects, examine methods of reducing adverse environmental effects, and consider alternatives to the proposed Project, which would eliminate or reduce the significant effects. The potential impacts include temporary construction-related effects and long-term operational effects. This EIR addresses the Project's potential environmental impacts using available plans, technical studies, and related information available. This EIR will be used by the City as the lead agency, other responsible and trustee agencies, interested parties, and the general public to evaluate the



Project's potential environmental impacts; see **Section 2.6: Agreements, Permits, and Approvals**, for a list of anticipated agreements and required responsible agency permits and approvals.

1.2 COMPLIANCE WITH CEQA

According to the State CEQA Guidelines §15064(f)(1), preparation of an EIR is required whenever a project may result in one or more significant effects on the environment. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project. CEQA requires that state and local government agencies consider the environmental effects of projects over which they have discretionary authority before taking action on those projects.

This EIR analyzes the Project's environmental effects to the degree of specificity appropriate to the current proposed actions, as required by State CEQA Guidelines §15146. The analysis considers the Project activities to determine the short-term and long-term effects associated with their implementation. This EIR discusses both direct and indirect Project impacts, as well as cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

Based on significance criteria, the Project's effects have been categorized as either "no impact," "less than significant impact," "less than significant with mitigation incorporated," or "significant unavoidable impact;" see **Section 4.0: Environmental Impact Analysis**. Mitigation measures are recommended to avoid or lessen potentially significant impacts. If the Project would result in significant unavoidable impacts, despite implementation of feasible mitigation, the decision-makers may approve the Project based on a "Statement of Overriding Considerations." This determination would require the decision-makers to balance the Project's benefits to determine if they outweigh the identified significant unavoidable impacts. State CEQA Guidelines §15093 provides in part the following:

- That the decision-makers balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- Where the decision of the public agency allows the occurrence of significant effects that are identified in the Final EIR but are not avoided or substantially lessened, the agency must state in writing the reason to support its action based on the Final EIR and/or other information on the record.
- If an agency makes a Statement of Overriding Considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination.



In addition to making findings under State CEQA Guidelines §15093, when there is an unavoidable adverse environmental impact, the decision-makers must also make findings under State CEQA Guidelines §15091 relating to mitigation measures and alternatives. Findings under both sections must be supported by substantial evidence.

1.3 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

1.3.1 INITIAL STUDY

As lead agency, the City undertook preparation of an “Initial Study,” which is a preliminary analysis intended to determine whether there may be a significant environmental impact (State CEQA Guidelines §§15063, 15365; Public Resources Code §§21080.1, 21080.3); see **Appendix 1.0-1: Initial Study, Notice of Preparation, and Comment Letters**. The key purpose of the Initial Study is for the lead agency to determine whether to prepare a:

- Negative Declaration (ND): If a project would result in no impact or less than significant impacts; or
- Mitigated Negative Declaration (MND): If a project would result significant impacts that can be mitigated to a less than significant level; or
- Environmental Impact Report (EIR): If a project would result in one or more significant impacts that cannot be mitigated to a less than significant level.

Other purposes of the Initial Study are to facilitate environmental review early in a project’s design, enable a project applicant to modify the project to mitigate impacts, and to identify potentially significant issues, and to assist with EIR preparation (scope, analysis, and type).

1.3.2 NOTICE OF PREPARATION

In compliance with the State CEQA Guidelines, the City has provided opportunities for responsible agencies, interested parties, and the general public to participate in the environmental review process. During Draft EIR preparation, efforts were made to contact various federal, state, regional, and local government agencies, and other interested parties to solicit comments on the scope of review in this document. This included the distribution of the Notice of Preparation (NOP) to various responsible and trustee agencies and interested parties. Pursuant to State CEQA Guidelines §15082, the City distributed the NOP directly to public agencies, special districts, and the public who had requested such notice. Additionally, the City mailed the NOP to owners and occupants of properties within a 300-foot radius of the Project site. The NOP was filed with the County of Los Angeles Clerk of the Board of Supervisors and State Clearinghouse (SCH) within the Governor’s Office of Planning and Research. The NOP was distributed on May 9, 2023, with a 30-day public review period ending on June 8, 2023. **Table 1.3-1: Summary of Comments on Notice of Preparation** summarizes the comments received from agencies/persons during the NOP process and provides a reference, as applicable,



to the section(s) of this EIR where the issues are addressed. The NOP and NOP comment letters are provided in **Appendix 1.0-1**.

Table 1.3-1: Summary of Comments on Notice of Preparation

Commenter	Summary of Comment and Where Addressed
Written Comments Received on the NOP	
<p>Margaret Carnright, Email Correspondence (received May 16, 2023)</p>	<ul style="list-style-type: none"> • Concerned about increased demands placed on public services (e.g., police and fire protection). • Apartment building would look out of place. • Traffic is already bad. • Perry Middle School and Gardena High School are also on Normandie Avenue. Concerned that the Project would increase the number of vehicles in the area, increasing traffic accidents and causing danger to kids walking home. • There are already other housing projects under construction on Normandie Avenue. <p>See Section 4.11: Public Services, Section 4.16: Aesthetics, Section 7.0: Effects Found Not To Be Significant, Section 4.13 Transportation, and Section 4.10: Population and Housing, respectively.</p>
<p>Susan Prieto Email Correspondence (received May 16, 2023)</p>	<ul style="list-style-type: none"> • Traffic is already bad. • Concerned that City infrastructure would not be able to handle the increased population. <p>See Section 4.13: Transportation, Section 4.11: Public Services and Section 4.15: Utilities and Service Systems, respectively.</p>
<p>Mitchell M. Tsai Email Correspondence (received June 2, 2023)</p>	<ul style="list-style-type: none"> • Requests that the City provide notice for any and all notices issued under CEQA and the Planning and Zoning Law. No other comments provided related to the EIR’s scope.
<p>Brandon Smith Email Correspondence (received June 6, 2023)</p>	<ul style="list-style-type: none"> • Providing additional housing in the County of Los Angeles is critical. • Traffic concerns would be minimized because the project beautifies the area and shifts people towards movement outside of their car such as biking, walking, and more utilization of public transportation (GTrans). <p>See Section 4.10: Population and Housing, Section 4.16: Aesthetics, and Section 4.13: Transportation, respectively.</p>
<p>Martha Bjerke Email Correspondence (received June 7, 2023)</p>	<ul style="list-style-type: none"> • Concerned that Project construction, specifically demolition and operations would add additional vehicles to the area and cause toxic air quality. • Concerned that the proposed apartment building would cast great shadows over the existing houses on Brighton Avenue, especially in the winter, due to the height of the proposed apartment building. • Concerned the Project would cause constant noise.



Commenter	Summary of Comment and Where Addressed
	<ul style="list-style-type: none"> Concerned that existing houses and properties on Brighton Avenue would lose all privacy in their backyards. <p>See Section 4.1: Air Quality, Section 4.5: Greenhouse Gas Emissions, Section 4.6: Hazards and Hazardous Materials regarding construction impacts, and Section 4.9: Noise regarding noise. There are no State CEQA Guidelines Appendix G thresholds concerning shadows or privacy.</p>
<p>Mitchell M. Tsai Email Correspondence (received June 9, 2023)</p>	<ul style="list-style-type: none"> Recommend local hire provisions to reduce environmental impacts (Air Quality, Greenhouse Gas, and transportation) and improve positive economic impact of the Project. Recommend considerations of CEQA mitigation measures to mitigate public health risks related to COVID-19 from the Project’s construction. <p>See Section 4.1: Air Quality, Section 4.5: Greenhouse Gas, and Section 4.13: Transportation, respectively.</p>
<p>Walter Kronberger Email Correspondence (received June 9, 2023)</p>	<ul style="list-style-type: none"> Concerned that building an apartment complex close to the railroad right-of-way may be dangerous in the case of chemical spills, hazardous gas releases, fire, or explosions. Concerned about increased demands placed on public services (e.g., police and fire protection). The schools in Gardena are already overcrowded. The project is surrounded by small side streets. The project increases the number of vehicles in the area and the surrounding streets would not be able to support this increase. Traffic is already bad and he is concerned that the Project would increase the number of vehicles in the area, increasing traffic accidents and causing danger to pedestrians. Concerned the electric power grid in Gardena would not be sufficient. <p>See Section 4.6: Hazards and Hazardous Materials, Section 4.11: Public Services, Section 4.13: Transportation, and Section 4.15: Utilities and Service systems, respectively.</p>
<p>Los Angeles County Sanitation Districts Letter (dated June 7, 2023, received June 9, 2023)</p>	<ul style="list-style-type: none"> Wastewater would be discharged to a local sewer line, not maintained by the districts, for conveyance to the District’s Gardena Pump Trunk Sewer located in Normandie Avenue, north of Artesia Boulevard. Wastewater would be treated at the Joint Water Pollution Control Plant (JWPCP) in the City of Carson. Connection fees would be charged. Wastewater treatment facilities’ capacity is based on regional growth forecast adopted by Southern California Association of Governments (SCAG). <p>See Section 4.15: Utilities and Service Systems.</p>



Commenter	Summary of Comment and Where Addressed
<p>California Department of Transportation (Caltrans) – District 7 Letter (dated June 7, 2023, received June 9, 2023)</p>	<ul style="list-style-type: none"> • Vehicle Miles Traveled (VMT) should be used as the primary metric in identifying transportation impacts for development projects. • The EIR should ensure that planning and development activities consider reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions. • Caltrans encourages Lead Agencies to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications, and transit service and bicycle and pedestrian connectivity improvements. • Caltrans recommends the Lead Agency include queuing analysis with signal timing for existing conditions and existing plus project traffic conditions for: <ul style="list-style-type: none"> ○ I-405 off-ramps to Normandie Ave/190th Street ○ I-110 off-ramps to Redondo Beach Blvd. ○ Turning pockets at I-405 on/off ramps and Normandie Avenue, SR-91 and Vermont Avenue, and I-110 on/off ramps and Redondo Beach Boulevard • Caltrans recommends the Lead Agency include a Multi-Modal Conflict Analysis and address Complete Street Access (ADA Curb Ramps, Sidewalks, Bike Lane, High Visibility Crosswalks, APS, etc.) for: <ul style="list-style-type: none"> ○ SR-91 (Artesia Boulevard) and Vermont Avenue ○ I-405 on/off ramps and 190th Street/Normandie Avenue intersections ○ I-110 on/off ramps and Redondo Beach Boulevard intersections <p>As to system operations comments, these are not CEQA matters, thus, are addressed in the Project’s Local Transportation Assessment.¹ As to other transportation matters, see Section 4.13: Transportation.</p>
<p>Brandon Smith Letter (dated June 6, 2023, received June 14, 2023)</p>	<ul style="list-style-type: none"> • Expresses support for the Project. • Discusses need of active/alternative modes of transportation. <p>See Section 4.13: Transportation</p>
<p>Los Angeles County Sanitation Districts Letter (dated and received June 22, 2023)</p>	<ul style="list-style-type: none"> • An addendum to the previous comment letter notes that direct connections to the trunk sewer would require sufficient justification for approval and a trunk Sewer Connection Permit issued by Districts. <p>See Section 4.15: Utilities and Service Systems</p>
<p>County of Los Angeles Fire Department Letter (dated June 15, 2023,</p>	<ul style="list-style-type: none"> • Health Hazardous Materials Division (HHMD) requests evaluation of the site’s potential vapor intrusion of gaseous volatile organic compounds (VOCs) following CalEPA’s Final Draft “Supplemental

¹ Normandie Crossing Specific Plan Local Transportation Assessment (“Local Transportation Assessment”) (Fehr & Peers, July 2023); see Appendix 4.13-2: Local Transportation Assessment.



Commenter	Summary of Comment and Where Addressed
received June 29, 2023)	<p>Guidance: Screening and Evaluating Vapor Intrusion” as portions of the final guidance may become law.</p> <ul style="list-style-type: none"> • HHMD also requests to review the DEIR and previous Phase I and Phase II Environmental Site Assessments before issuing clearance. <p>See Section 7.5: Hazards and Hazardous Materials</p>
Native American Heritage Commission Letter (dated May 15, 2023, received July 12, 2023)	<ul style="list-style-type: none"> • Outlines AB 52 (Tribal Consultation) requirements concerning the tribal consultation process during environmental review. <p>See Section 4.14: Cultural Resources</p>
Verbal Comments Received at the May 18, 2023 Public Scoping Meeting	
Walter Kronberger	<ul style="list-style-type: none"> • Traffic is already bad on Normandie Avenue around the schools. • Concerned that the development would add more students to schools. <p>See Section 4.13: Transportation and Section 4.11: Public Services, respectively.</p>
Kevin Collier	<ul style="list-style-type: none"> • Concerned with traffic and wants the noise study to look at West 170th Street and West 169th Street. • Wants the traffic study to address vehicles accessing Normandie Avenue northbound. <p>See Section 4.13: Transportation.</p>
Christine Brean	<ul style="list-style-type: none"> • Would the Project have an effect on well-water? • Would it impact residents’ access to water? <p>See Section 4.15: Utilities and Service Systems.</p>

1.3.3 SCOPING MEETING

Pursuant to CEQA Statute §21083.9, the lead agency is required to conduct at least one scoping meeting for all projects of statewide, regional, or area-wide significance. A scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, and environmental effects to be analyzed in the EIR. The City held a public scoping meeting on May 18, 2023 at 7:00 PM at the City of Gardena City Council Chambers, 1700 West 162nd Street, Gardena, California 90247. Three public comments were provided during the scoping meeting and are detailed above in **Table 1.3-1**.

1.3.4 SCOPE AND FOCUS OF EIR

This Draft EIR addresses the Project’s potential environmental effects and was prepared following input from the public and the responsible and affected agencies, through the EIR scoping process, as discussed previously. The contents of this Draft EIR were established based on the Initial Study findings and public and agency input received through the NOP process. Based on the Initial Study



findings, a determination was made that an EIR was required to address the Project’s potentially significant environmental effects concerning the following topical issues:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The Initial Study/NOP also noted that cumulative and growth-inducing impacts would be analyzed in the EIR and that alternatives would be considered.

Where the Initial Study determined that the Project would have “no impact” or a “less than significant impact” on environmental topics or specific threshold questions, these topics and thresholds are not addressed in the EIR. Based on the Initial Study findings, the following environmental topical issues are not addressed in the EIR. Substantiation for the “no impact” or “less than significant impact” findings is provided in **Section 7.0: Effects Found Not to be Significant**.

- Agriculture and Forestry Resources
- Biological Resources
- Mineral Resources
- Wildfire

Additionally, certain issues associated with aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, and population and housing are also included in **Section 7.0** based on the Initial Study findings.

1.4 PUBLIC REVIEW – COMPLIANCE WITH CEQA

1.4.1 PUBLIC REVIEW OF DRAFT EIR

The Notice of Availability of the Draft EIR has been provided to agencies, organizations, and interested groups and persons for comment during a 45-day review period in accordance with State CEQA Guidelines §15087 and §15105. The Notice of Completion of the Draft EIR has also been distributed as required by CEQA. The Draft EIR is available to the public for review at the City of Gardena website, as follows:

- <https://www.cityofgardena.org/community-development/planning-projects/>



If you cannot retrieve a copy from the website, please contact Amanda Acuna at the contact information below to obtain the document in an alternate way.

The public is invited to comment in writing on the information contained in this document. Responsible agencies, interested parties, and the public are invited to provide written comments on the Draft EIR. All comments should be submitted in writing to:

Amanda Acuna, Senior Planner
City of Gardena Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3732
Email: aacuna@cityofgardena.org
Phone: (310) 217-6110

1.4.2 FINAL EIR

Pursuant to State CEQA Guidelines §15088 and upon completion of the 45-day Draft EIR public review period, the City will evaluate all written comments and prepare written responses to comments received during the public review period concerning significant environmental issues. As set forth in State CEQA Guidelines §15132, the Final EIR will be prepared and will include:

- The Draft EIR or a revision of the Draft;
- Comments and recommendations received on the Draft EIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR; and
- The lead agency's responses to significant environmental points raised in the review and consultation process.

Additionally, pursuant to State CEQA Guidelines §15088, after the Final EIR is completed, the City will provide a written proposed response to each public agency on comments made by that public agency at least ten days prior to certifying the EIR.

1.4.3 CERTIFICATION OF FINAL EIR

The Final EIR will be considered by the City's Planning Commission and City Council (the recommending and decision-making bodies for the Project) for certification, consistent with State CEQA Guidelines §15090, which states:

Prior to approving a project, the lead agency shall certify that:

- The Final EIR has been completed in compliance with CEQA;



- The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- The Final EIR reflects the lead agency's independent judgment and analysis.

Regarding the EIR's adequacy, according to State CEQA Guidelines §15151, "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

1.4.4 PROJECT CONSIDERATIONS

After Final EIR certification, the City may consider approval of the proposed Project. A decision to approve the Project would be accompanied by specific, written findings, in accordance with State CEQA Guidelines §15091 and, if necessary, a specific, written Statement of Overriding Considerations, in accordance with State CEQA Guidelines §15093.

1.5 FORMAT OF THE EIR

This EIR's purpose is to enable the City and other responsible and trustee agencies and interested parties to evaluate the Project's environmental impacts.

This EIR is organized into the following sections:

Section ES: Executive Summary, provides a Project summary and summary of environmental impacts, and the proposed mitigation measures and alternatives.

Section 1.0: Introduction, provides CEQA compliance information.

Section 2.0: Project Description, details the Project's location, environmental setting, background and history, characteristics, discretionary actions, goals/objectives, construction schedule/ phasing, agreements, and required permits and approvals.

Section 3.0: Basis of Cumulative Analysis, describes the cumulative analysis' proposed approach and methodology.

Section 4.0: Environmental Analysis, discusses the existing conditions for each environmental issue area. This analysis also describes methodologies for significance determinations, identifies the Project's short-term and long-term environmental impacts, recommends mitigation measures to avoid or reduce the significance of environmental impacts, and identifies any areas of potentially significant



unavoidable impacts. This section also discusses cumulative impacts that could arise as a result of Project implementation of the proposed Project.

Section 5.0: Other CEQA Considerations, summarizes unavoidable significant impacts, and discusses significant irreversible environmental changes, and growth-inducing impacts.

Section 6.0: Alternatives to the Proposed Project, describes potential Project alternatives, including alternatives considered but rejected from further consideration, the No Project Alternative, various Project Alternatives, and identifies the Environmentally Superior Alternative.

Section 7.0: Effects Found Not to Be Significant, describes potential impacts that have been determined through the CEQA process not to be significant.

Section 8.0: List of Preparers identifies the lead agency and EIR preparation team, as well as summarizes the EIR consultation process.

Section 9.0: Appendices, contains the NOP, notification documents, and technical studies, which are available at the City's website, as follows:

<https://www.cityofgardena.org/community-development/planning-projects/>

The City can also provide copies on a thumb drive.

1.6 RESPONSIBLE AND TRUSTEE AGENCIES

1.6.1 LEAD AGENCY

The City of Gardena is the lead agency under CEQA. This EIR has been prepared in accordance with Public Resources Code §21000 *et seq.*, the State CEQA Guidelines, and the City's Policies and Procedures for Implementing CEQA. CEQA requires lead agencies to consider potential environmental effects that may occur with implementation of a project and to avoid or substantially lessen significant effects to the environment when feasible. When a project may have a significant effect on the environment, the agency with primary responsibility for carrying out or approving the project (the lead agency) is required to prepare an EIR.

1.6.2 RESPONSIBLE AND TRUSTEE AGENCIES

Other federal, state, and local agencies engage in the Project's review and approval, including trustee and responsible agencies under CEQA. Under CEQA, a trustee agency is a state agency that has jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. A responsible agency is an agency other than the lead agency that has responsibility for carrying out or approving a project. Responsible and trustee agencies are consulted by the CEQA lead agency to ensure the opportunity for input and also review and comment on the Draft EIR. Responsible agencies also use the CEQA document in their decision-



making. Several agencies other than the City may require permits, approvals, and/or consultation in order to implement various Project elements; see **Section 2.6: Agreements, Permits, and Approvals**.

1.7 INCORPORATION BY REFERENCE

All or portions of another document, which is a matter of public record or is generally available to the public, may be incorporated by reference. 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 document's text.

The references outlined below, which were utilized during preparation of this EIR, are available for review on the City of Gardena Website, at <https://cityofgardena.org/planning-and-zoning/> and by request at the Community Development Department – please see above contact information.

Gardena General Plan 2006. The City adopted the comprehensive Gardena General Plan 2006 (GGP) in 2006 and various elements and plans have been amended since that time as noted below. The GGP constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The GGP 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 GGP serves as a decision-making tool to guide future growth and development decisions.

The GGP consists of the following elements and plans:

- Community Development Element
 - Land Use Plan (updated in June 2012, March 2013, and February 2023)
 - Economic Development Plan
 - Community Design Plan
 - Circulation Plan (updated in July 2020)
- Community Resources Element
 - Open Space Plan
 - Conservation Plan
- Community Safety Element
 - Public Safety Plan (updated February 2022)
 - Noise Plan



- Housing Element (updated in February 2023; see below)
- Environmental Justice Element (adopted in February 2022)
- Implementation
 - Implementation Program (updated in February 2022)

The GGP was used throughout this EIR as a source of baseline data.

City of Gardena General Plan 2006 Final Environmental Impact Report (GRC Associates, Inc., April 2006) (SCH #2005021125). The GGP Final Environmental Impact Report (GGP FEIR) analyzed the potential environmental impacts that would result from the GGP implementation. At the time of the GGP FEIR's writing, the City was 98.5 percent developed and approximately 45 acres of vacant land existed. GGP FEIR Tables 2 and 3 present the forecast capacity at the City's buildout as 22,329 DU, a population of 63,799 persons, and approximately 18.9 million SF of non-residential land uses. Buildout was estimated to occur over 20 years. The GGP FEIR concluded significant and unavoidable impacts concerning Transportation (GGP FEIR page 138).

In February 2023, the City updated its Land Use Plan and changed the zoning for the Inventory Sites identified in the Housing Element. As the City also intends to update its Land Use Plan and change the zoning for Non-inventory Sites to provide a more coherent zoning pattern, the City is currently preparing an EIR to examine the environmental impacts of all of the proposed changes. The GGP FEIR was used throughout this EIR as a source of land use, policy, and baseline data.

Revised 2021-2029 Housing Element 6th Cycle. The City of Gardena's 2021-2029 Housing Element (HE) was adopted in January 2022, and then readopted on February 15, 2023, with additional revisions. The HE analyzes the City's housing needs for all income levels and develops strategies to provide for those housing needs. It is a key part of the City's General Plan. This HE is an eight-year program extending from 2021 through 2029. The HE identifies strategies and programs that focus on the following: 1) conserving and improving existing affordable housing; 2) providing adequate sites for residential development; 3) assisting in the provision of affordable housing; 4) removing governmental and other constraints on housing development; and 5) affirmatively furthering fair housing. The HE identified 122 candidate sites (468 parcels consolidated) that are considered viable for housing development and will receive a housing overlay designation. HE Appendix C: Sites Inventory provides detailed parcel data for sites receiving the overlay designation. The northern portion of the Project site (i.e., APNs 6106-030-011, 6106-030-015, and 6106-030-017), where the Project proposes an apartment building, is identified as candidate housing site #91. The HE was used throughout this EIR as a source of baseline data for the northern portion of Project site. As noted, preparation of an EIR for the update of the City's Land Use Plan, Zoning Code, and Zoning Map is currently underway (Land Use/Zoning Project). A Notice of Preparation for the Land Use/Zoning Project EIR was issued on April 13, 2023 and the actions are anticipated to be complete in early 2024.



Gardena Municipal Code. The Gardena Municipal Code (GMC) regulates municipal affairs within the City's jurisdiction including, without limitation, zoning regulations (codified in GMC Title 18). GMC Title 18 is the primary tool for implementing the GGP's Goals, Objectives, and Policies. The GMC is referenced throughout this EIR to establish the Project's regulatory requirements according to the City's regulatory framework.



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An architectural rendering of a modern, multi-story apartment building. The building features a mix of light-colored facades and dark window frames. Each floor has a balcony with a glass railing. In the center of the building is a rooftop pool area with a wooden deck, lounge chairs, and a small tree. The pool is surrounded by a glass safety fence. In the foreground, there are several rooftop terraces with wooden decking and some greenery. The overall scene is bright and clear, suggesting a sunny day.

2.0 PROJECT DESCRIPTION



2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Normandie Crossing Specific Plan (“Project”) site is in the County of Los Angeles, approximately 12 miles southwest of downtown Los Angeles, in the southeast portion of the City of Gardena (“City”), at 16829, 16835, and 16907 South Normandie Avenue; see **Exhibit 2-1: Regional Vicinity Map**.

The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west; see **Exhibit 2-2: Local Vicinity Map**.

2.4 ENVIRONMENTAL SETTING

The City encompasses approximately 6.0 square miles in the County’s South Bay region. Gardena is bordered by the City of Hawthorne and unincorporated County lands to the north, the cities of Los Angeles and Torrance to the south, the City of Los Angeles to the east, and unincorporated County lands and the cities of Hawthorne and Torrance to the west. Gardena is an urbanized city with a mix of residential densities, although low-density residential uses predominate. The City also contains a mix of retail, commercial, office, and industrial uses.

Regional access to the Project site is provided via four major freeways: I-105 to the north; I-405 to the south and east; and I-110 and SR-91 (becomes West Artesia Boulevard) to the east. From I-105, access to the Project site is provided via Vermont Avenue, from I-405, access is provided via South Normandie Avenue, from I-110, access is provided via Artesia Boulevard at the City’s northern portion, which intersects with Normandie Avenue, and from SR-91, access is provided via Artesia Boulevard in the City’s southern portion, which intersects with Normandie Avenue. The existing conditions and Circulation Plan classifications¹ for surrounding roadways are summarized below:

- **Normandie Avenue**, which is oriented north-south on the Project site’s eastern boundary, contains four divided vehicle lanes with left-turn lanes provided at major intersections, pedestrian sidewalks on both sides of the right of way (ROW), and Union Pacific Railroad (UPRR) railroad tracks along the road's western boundary. The railroad tracks cross onto the roadway’s eastern side along the Project's frontage. Normandie Avenue is classified as a Major Collector (four lanes, undivided with parking and Class II bike lane). Normandie Avenue is designated as a truck route within the City.

¹ City of Gardena. (2006). Gardena General Plan 2006, updated 2022. Figure CI-1: Roadway Network and Figure CI-2: Roadway Cross Sections. Gardena, CA: City of Gardena. Retrieved from: <https://cityofgardena.org/wp-content/uploads/2016/04/Circulation-Plan-2020-Update.pdf>, accessed April, 2023.



- **Brighton Way**, which is oriented north-south and forms the Project site’s western boundary, is an alleyway. Brighton Way is classified as a Local Street (two lanes undivided with parking). On-street parking is not provided.
- **West 169th and West 170th Streets**, are oriented east-west and form the Project site’s northern and southern boundaries, respectively. West 169th and West 170th Streets are two-lane, undivided with parking. These roadways are classified as Local Streets (two lanes undivided with parking). West 170th Street dead ends at the railroad right-of-way and does not connect to Normandie Avenue or the segment east of it.

The Project site is located less than one mile walking distance from five different bus routes and the Harbor Gateway Transit Center, which are discussed further in **Section 4.13: Transportation**. Pedestrian access to the Project site is provided by sidewalks, which are present on West 169th Street, West 170th Street, and Normandie Avenue surrounding the Project site, except along the south side of 169th Street, between Brighton Way and the alley just west of Brighton Avenue.

2.1.1 ONSITE LAND USES

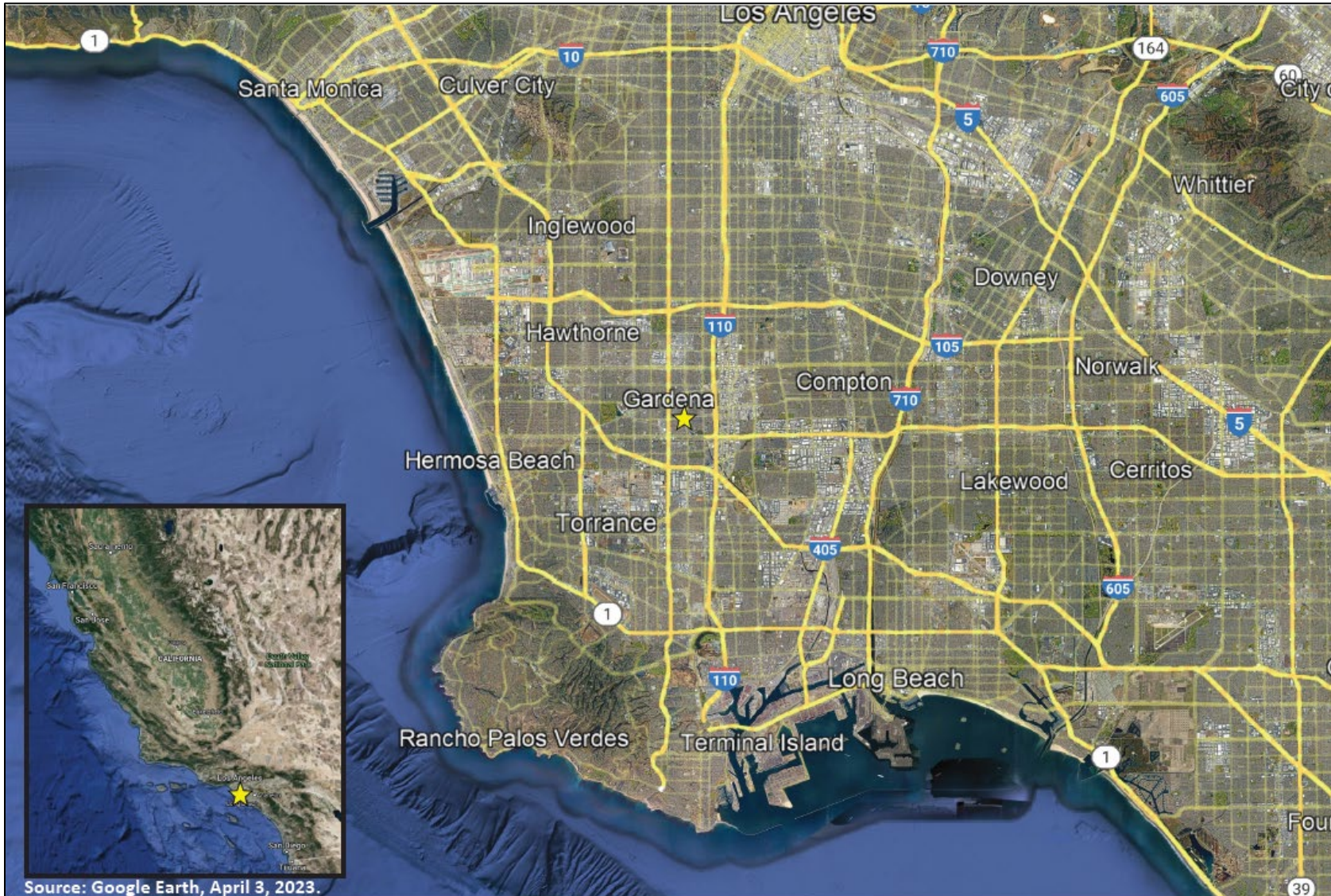
The Project site is relatively level, sloping from the northeast corner to the southwest corner, with an elevation difference of approximately 7.0 feet across the site. As depicted in **Exhibit 2-2**, the Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. **Table 2-1: Existing Onsite Structure Summary** summarizes the existing onsite land uses by APN and address, and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. One of the buildings on Parcel 4 contains approximately 9,324 SF of industrial floor area that is in a dilapidated condition and is therefore not occupiable or currently being used. Additionally, the Project site includes a railroad spur from the adjacent UPRR northern track. The spur is associated with former onsite industrial operations but is no longer in use.

Table 2-1: Existing Onsite Structure Summary

Parcel ID ¹	Assessor’s Parcel Number ²	Parcel Size (Acres) ²	Address ²	Number of Buildings	Year Built ²	Building (SF) ²
1	6106-030-011	0.55	16829 South Normandie Avenue	2	1963, 1976	10,880
2	6106-030-015	0.47	16835 South Normandie Avenue	1	1956/1957	9,600
3	6106-030-016	0.30	No Address	0	-	-
4	6106-030-017	3.93	16907 South Normandie Avenue	3	1952	94,944 ³
	Total	5.25		6		115,424³

Notes:

1. The Parcel ID (Identification Number) correlates with labels on **Exhibit 2-2**.
2. ParcelQuest. (January 2021). Assessor Data. Retrieved from: <https://pqweb.parcelquest.com/#home>.
3. This total includes 9,324 square feet of building that is unoccupied and dilapidated.



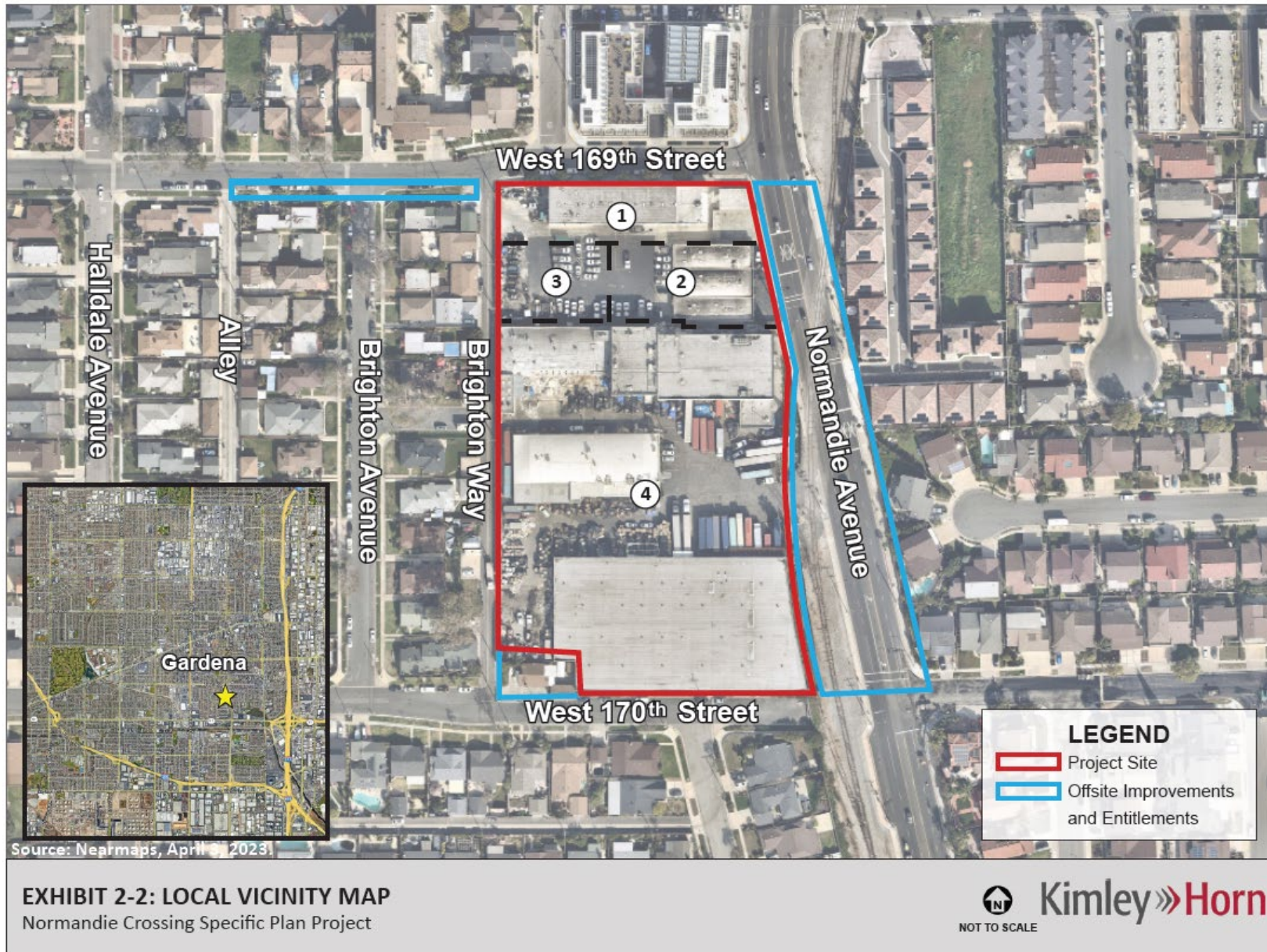
Source: Google Earth, April 3, 2023.

EXHIBIT 2-1: REGIONAL VICINITY MAP
Normandie Crossing Specific Plan Project





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2.1.1 EXISTING GENERAL PLAN AND ZONING

Table 2-2: Existing Land Use Designations and Zoning identifies the Gardena General Plan (GGP) land use designations and zoning for the Project site. As indicated in **Table 2-2**, the GGP designates the Project site as Industrial, which provides for a wide range of industries, technology-related uses and supporting facilities, and business parks.² Additionally, the GGP assigns a High Density 30 Overlay to the Project site’s northern approximately 1.32 acres (i.e., Parcels 1, 2, and 3).

The Zoning Map classifies the Project site’s northern approximately 1.32 acres (i.e., Parcels 1, 2, and 3) as Industrial Zone (M-1) and the southern approximately 3.93 acres (Parcel 4) as General Industrial Zone (M-2); see **Table 2-2**.³ Commercial, manufacturing, and industrial uses are permitted in the M-1 and M-2 zones.⁴ Additionally, Parcels 1, 2, and 3 are zoned Housing Overlay 4 (HO-4), which allows a density of 21-30 dwelling unit per acre (DU/AC).

Table 2-2: Existing Land Use Designations and Zoning

Parcel ID ¹	Assessor’s Parcel Number ²	Size (Acres) ²	Address ²	Existing General Plan Land Use ³	Existing Zoning ⁴
1	6106-030-011	0.55	16829 South Normandie Avenue	Industrial, High Density 30 Overlay	Industrial Zone (M-1), Housing Overlay 4 (HO-4) ⁵
2	6106-030-015	0.47	16835 South Normandie Avenue	Industrial, High Density 30 Overlay	Industrial Zone (M-1), Housing Overlay 4 (HO-4) ⁵
3	6106-030-016	0.30	No Address	Industrial, High Density 30 Overlay	Industrial Zone (M-1), Housing Overlay 4 (HO-4) ⁵
4	6106-030-017	3.93	16907 South Normandie Avenue	Industrial	General Industrial Zone (M-2) ⁶
Total		5.25			

Notes:

1. The Parcel ID (Identification Number) correlates with labels on **Exhibit 2-2** and **Exhibit 2-3**.
2. ParcelQuest. (January 2021). Assessor Data. Retrieved from: <https://pqweb.parcelquest.com/#home>.
3. City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006, Updated 2022. Figure LU-2: 2013 General Plan Land Use Policy Map*. Gardena, CA: City of Gardena. Retrieved from: <https://cityofgardena.org/wp-content/uploads/2023/03/Land-use-Plan-2023-Update-FINAL.pdf>. Accessed April, 2023.
4. City of Gardena. (2020). *Zoning*. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zoning_2020.pdf. Accessed April, 2023.
5. See GMC §18.36.060: Property Development Standards and Ordinance 1847.
6. See GMC §18.38.010: General Industrial Zone (M-2).

² City of Gardena. (2006, Updated February 2023). *Gardena General Plan 2006, Updated 2023*. page LU-19. Gardena, CA: City of Gardena. Retrieved from: <https://cityofgardena.org/wp-content/uploads/2023/03/Land-use-Plan-2023-Update-FINAL.pdf>, accessed April, 2023.

³ City of Gardena. (2020). *City of Gardena Zoning 2020*. Retrieved from: https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zoning_2020.pdf. accessed April, 2023.

⁴ Gardena Municipal Code §18.36.020: Uses Permitted and §18.38.010: General Industrial Zone (M-2).



Source: Gardena GIS Online, General Plan and Zoning - PUBLIC

EXHIBIT 2-3: ZONING MAP
Normandie Crossing Specific Plan Project





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2.1.2 SURROUNDING LAND USES

The Project site is generally surrounded by single- and multi-family residential uses. There are two immediately adjacent parcels that are outside the Specific Plan area, but are where entitlement actions are proposed; see **Section 2.3: Project Characteristics**. The parcel immediately adjacent to the Project site’s southwest corner, at 16964 West 179th Street, is occupied by a single-family residential (SFR) DU. The parcel immediately adjacent and east of the Project site is occupied by UPRR tracks. Both of these parcels are currently designated Industrial and zoned M-2. The surrounding land uses and zoning are summarized in **Table 2-3: Surrounding Land Uses and Zoning** (see **Exhibit 2-3**).

Table 2-3: Surrounding Land Uses and Zoning

Direction	Existing On-the-Ground Land Uses	Zoning ¹
North	North: West 169 th Street, with a 63-unit single-room occupancy multi-family development across the street, at 16819 South Normandie Avenue. Northwest: Single-family residential uses are west of South Normandie Avenue.	North: Industrial Zone (M-1) ² Northwest: Low-Density Multi-Family Residential Zone (R-2) ³
South	South: West 170 th Street, with single-family residential uses across the street. Southwest: One single-family residential dwelling unit is immediately adjacent, at 16964 West 179 th Street.	South: Single-Family Residential Zone (R-1) ⁴ Southwest: General Industrial Zone (M-2) ⁵
East	East: South Normandie Avenue and an existing UPRR track (north/south orientation) are immediately adjacent and to the east. Northeast/Southeast: Multi- and single-family residential uses are across South Normandie Avenue, respectively.	East: General Industrial Zone (M-2) ⁵ Northeast: Normandie Estates Specific Plan ⁶ / Southeast: Single-Family Residential Zone (R-1) ⁴
West	Brighton Way (an alleyway) is to the west, with single-family and duplex residential uses across the alley.	Low-Density Multiple Family Residential Zone (R-2) ³

Notes:

1. City of Gardena. (2020). Zoning. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zoning_2020.pdf.
2. GMC Chapter 18.36: Industrial Zone (M-1). See GMC §18.36.040: Performance Standards, for property development standards.
3. GMC Chapter 18.14: Low-Density Multi-Family Residential Zone (R-2). See GMC §18.14.050: Property Development Standards, for property development standards.
4. GMC Chapter 18.12: Single-Family Residential Zone (R-1). See GMC §18.12.050: Property Development Standards, for property development standards.
5. GMC Chapter 18.38: General Industrial Zone (M-2). M-1 Zone performance standards apply; see GMC §18.36.040.
6. Normandie Estates Specific Plan single-family detached residential.
7. GMC §18.14.050: Property Development Standards.



2.5 PROJECT CHARACTERISTICS

2.1.3 PROJECT OVERVIEW

The Applicant seeks approval of the Normandie Crossing Specific Plan (NCSP)(SP #1-21) Project. The Project proposes to establish a maximum allowable development within the approximately 5.25-acre NCSP area of up to 403 DU. Because the City does not have any zone which would accommodate the proposed development, the Applicant is proposing the NCSP, which would establish the site-specific zoning regulations and development standards for this area. The NCSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. In addition to requiring a Specific Plan, the Project requires various other approvals, including a Development Agreement; see **Section 2.6: Agreements, Permits, and Approvals** below. The approvals are collectively referred to as the “Project.”

For analysis purposes, it is assumed all existing approximately 115,424 SF of industrial uses would be removed and replaced with the proposed residential development. However, because 9,324 SF of one of the existing industrial buildings are in a dilapidated condition and therefore are not occupiable, this analysis will evaluate the loss of 106,100 SF of industrial uses.

The Project proposes offsite sidewalk and railroad improvements at the locations depicted on **Exhibit 2-2**. The offsite sidewalk improvements are proposed along the south side of 169th Street, west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. The offsite track and other railroad improvements are proposed on South Normandie Avenue along the Project site’s eastern boundary, pursuant to California Public Utilities Commission (CPUC) standards and UPRR guidelines.

Additionally, the Project proposes to redesignate and rezone two parcels that are adjacent to the site and outside the proposed Specific Plan area to be consistent with existing uses, as depicted on **Exhibit 2-2**. These areas include the residential parcel at 16964 West 179th Street and the UPRR parcel immediately adjacent and east of the Project site.

The proposed Project components are further described below.

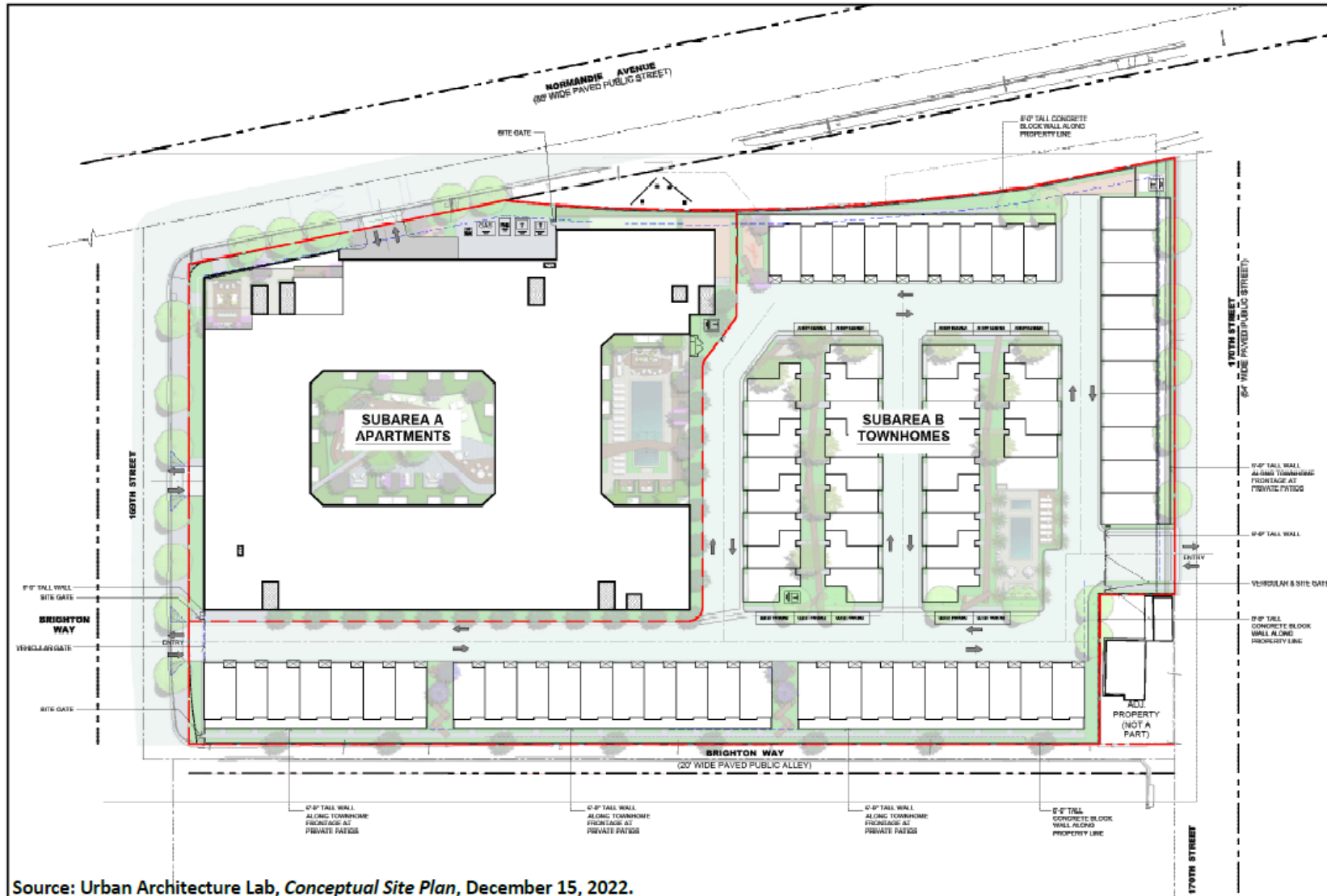
2.1.4 LAND USE PLAN

The Specific Plan proposes a 403-DU multi-family residential development divided into two Subareas as depicted in **Exhibit 2-4: Conceptual Site Plan**.

- Subarea A, which is at the Project site’s northern portion, is proposed to contain 328 apartment units within one building and associated open space and amenities; and



- Subarea B, which is at the Project site's southern portion, is proposed to contain 75 townhome-style units within nine buildings and associated open space and amenities.



Source: Urban Architecture Lab, *Conceptual Site Plan*, December 15, 2022.

EXHIBIT 2-4: CONCEPTUAL SITE PLAN
Normandie Crossing Specific Plan Project





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Overall, the Project site would be developed at a density of approximately 77 DU/AC. Additionally, the Project proposes approximately 50,493 total SF of open space, comprised of approximately 20,150 SF of private open space and approximately 30,343 SF of common open space.

Table 2-4: Land Use Summary - Proposed Project, summarizes the proposed development according to land use type.

Table 2-4: Land Use Summary - Proposed Project

Description	Industrial (Square Feet) ¹	Residential ¹	
		(Square Feet)	(Dwelling Units)
Industrial (to be removed)	-115,424	-	-
Industrial (to be removed, but excluded from Project impact offsets)	9,324		
Apartment Building	-	308,308	328
Townhome-Style Residential	-	120,673	75
Project Total	-106,100	+428,981	+403

Notes:
1. See Table 2-1.
2. Urban Architecture Lab (2022). 16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.

Apartments (Subarea A)

The Project proposes an approximately 308,308-SF apartment building with 328 DU at a density of approximately 155 DU/AC. The building would be seven stories at a maximum height of approximately 90 feet. **Table 2-5: Land Use Summary – Proposed Apartment Building** summarizes the apartment building’s proposed floor areas. The various proposed apartment product types are 68 studio, 194 one-bedroom, and 66 two-bedroom units.

Each Subarea A unit would be provided a minimum of 50 SF of private open space. The common open space amenities proposed in Subarea A total approximately 22,698 SF and include: roof deck with BBQs and seating areas; swimming pool with BBQ and seating areas; a dog park fitness room; club houses; and a courtyard with seating area.



Table 2-5: Land Use Summary – Proposed Apartment Building¹

Level	Description	Floor Area ² (Square Feet)	Dwelling Units
L1	Lobby	2,800	
	Amenity I: Fitness Room	2,682	
L2 - L7	Apartments	241,109	328 (68 Studio, 194 1-Bedroom, 66 2- Bedroom)
	Balconies (Covered) ⁴	6,991	
L3	Amenity II: Courtyard	1,446	
	Amenity III: Pool Court	1,500	
L4	Amenity IV: BBQ Covered Dining Area	795	
Other	Other ³	50,985	
Total		308,308	
Notes: 1. Urban Architecture. (2022). <i>16911 Normandie Apartments & Townhomes Entitlement Set</i> . 2. "Floor Area," as defined in GMC Chapter 18:04: Definitions. 3. Other = Circulation, stairs, elevator shafts, trash vestibules, and trash rooms. 4. Only covered portions of balconies are included in the floor area calculation.			

Onsite vehicle parking (approximately 399 spaces) and bicycle parking (173 spaces) are proposed in the building’s first two levels, as follows:

- Level 1:
 - Bicycle Parking, 173 Spaces: 16 short-term and 157 long-term.
 - Vehicle Parking, 195 Spaces: 135 Standard, 20 electric vehicle charging (one of which is a van electric vehicle charging), and 8 accessible.
- Level 2:
 - Vehicle Parking, 204 Spaces: 150 Standard and 20 electric vehicle charging.

The vehicle parking spaces would be unbundled from the rental of the apartment units to encourage alternate modes of transportation. Up to 90 spaces could be tandem; tandem spaces could only be rented as a pair to a single unit.

Townhomes (Subarea B)

The Project proposes 75 townhome-style units in nine buildings (totaling approximately 120,673 SF), at a density of approximately 24 DU/AC. The townhome buildings would be three-story at a maximum height of approximately 40 feet. **Table 2-6: Land Use Summary – Proposed Townhomes** summarizes the townhome proposed floor areas. The various proposed townhome product types are 30 two-bedroom, 35 three-bedroom, and 10 four-bedroom units.



Table 2-6: Land Use Summary – Proposed Townhomes

Level	Description	Floor Area ¹ (Square Feet)	Dwelling Units
L1-L3	Townhouses	115,982	30 two-bedroom 35 three-bedroom 10 four-bedroom
	Balconies (Covered) ²	3,916	
L1	Amenity V	775	
	Subtotal	120,673	

Source: Urban Architecture. (2022). *16911 Normandie Apartments & Townhomes Entitlement Set*.

Notes:

1. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
2. Only covered portions of balconies are included in the floor area calculation.

Each Subarea B unit would be provided 50 SF of private open space (i.e., balconies and roof decks). The common open space amenities proposed in Subarea B total approximately 7,645 SF and include the following: swimming pool with BBQ and seating areas; dog park; club house; and paseos with seating areas.

Approximately 160 vehicle parking spaces (150 spaces in attached garages and 10 guest spaces) are proposed in Subarea B.

2.1.5 UTILITIES AND INFRASTRUCTURE

NCSP Chapter 4, Section V: Public Facilities and Utilities Plan addresses the NCSP’s public facilities and utilities. The NCSP includes the distribution, location, extent of major components of public and private utilities and infrastructure, and other essential facilities within the NCSP area that are needed to support the proposed development. The utilities and infrastructure proposed in the NCSP area include a domestic, fire and irrigation water line connection, sewer line connection, onsite stormwater drainage and management design, electrical power line connection, natural gas line connection, and solid waste collection areas.

The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design (Project Design Feature **(PDF) AQ-2/PDF GHG-1. Electrical Vehicle Charging Design**). Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code. Additionally, the Project would be all electric- there would be no natural gas use by any of the Project land uses **(PDF AQ-3/PDF GHG-2. All Electric)**.

NCSP Chapter 4, Section III: Transportation and Circulation Plan specifies the proposed transportation and circulation plan. Vehicular access to the NCSP would be provided by the following four driveways:



- Driveway 1 would serve Subarea A and provide access to the apartment building's parking garage from 169th Street west of South Normandie Avenue.
- Driveway 2 would serve Subarea A and provide a right-in/right-out only driveway that would also serve the apartment building's parking garage from southbound South Normandie Avenue.
- Driveway 3 would serve Subarea B and provide access to the townhomes from 170th Street. This driveway would also serve as fire truck access for both Subareas A and B.
- Driveway 4 would serve Subarea B and provide access to the townhomes from 169th Street. This driveway would also serve as fire truck access for both Subareas A and B.
- For onsite pedestrian access, the Project proposes sidewalk improvements along the Project frontages (i.e., West 169th and West 170th Streets, South Normandie Avenue, and Brighton Way).

2.1.6 DEVELOPMENT REGULATIONS AND REQUIREMENTS

NCSP Chapter 5, Section I: Development Standards provides the specific regulations and requirements for development in the NCSP. The NCSP specifies the standards to which development in the NCSP area would be subject. These regulations (which would replace the existing zoning regulations) address various aspects of development, as follows:

- Permitted and Prohibited Uses: A project in the NCSP area would only be occupied by land uses identified in the NCSP and would be subject to the applicable City approval process.
- Development Standards: A project in the NCSP area would be subject to the NCSP's density and development capacity, maximum building height, floor area ratio, dwelling unit size, and setback requirements.
- Design Standards: A project in the NCSP area would be subject to the NCSP's design requirements concerning siding materials, colors, landscaping, lighting, and sustainability.
- Recreation and Open Space Standards
- Parking and Loading Standards
- Requirements related to Nonconforming Uses and Structures
- Maintenance Standards
- Standards for Accessory Structures, Additions, Walls, Fences, and Other Changes
- Sign Program Requirements



2.1.7 IMPLEMENTATION

NCSP Chapter 7: Implementation presents the program necessary to implement the NCSP's land use plan, utilities/infrastructure, and development standards described above, which address the framework, review authority, substantial conformance, and NCSP modifications.

2.1.8 OFFSITE IMPROVEMENTS AND ENTITLEMENTS

The Project proposes offsite sidewalk and railroad improvements, and land use and zoning entitlements, as described below.

Sidewalk Improvements

The Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of 169th Street, just west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. The sidewalk improvements would be constructed pursuant to GMC §17.08.170: Improvements and designed to be consistent with the GGP Circulation Element requirements for a Local Street.

South Normandie Avenue Railroad Improvements

The Project proposes various railroad track and roadway improvements along South Normandie Avenue pursuant to current CPUC standards and UPRR guidelines, as follows:

- Removing approximately 170 linear feet of railroad spur track, which enters the Project site and formerly served the southernmost industrial building (i.e., 16911 South Normandie Avenue).
- Removing approximately 830 linear feet of railroad spur track, which enters the Project site and formerly served the central industrial building (16907 South Normandie Avenue).
- Constructing a new median both north and south of the track alignment.
- Installing new warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks.
- Refreshing (i.e., adding a slurry seal) the railroad crossing pavement markings immediately north and south of the track alignment.

Residential Parcel at 16964 West 179th Street

Concerning the SFR parcel immediately adjacent to the Project site's southwest corner (not a part of the Specific Plan area) at 16964 West 179th Street, the Project proposes to redesignate the parcel from Industrial to Single Family Residential, and rezone from General Industrial Zone (M-2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.



Union Pacific Railroad Parcel

Concerning the parcel immediately adjacent and east of the Project site that is currently occupied by UPRR tracks, the Project proposes to redesignate the property from Industrial to Public/Institutional, and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use.

2.4 PROJECT CONSTRUCTION ACTIVITIES AND PHASING

Project construction is conservatively analyzed to occur in a single phase. Phased occupancy of the proposed Project would be permitted, provided all occupiable areas are deemed safe for fire and life safety purposes. For purposes of the environmental analysis, opening year is assumed to be 2027.

Project construction is scheduled to occur over approximately 3.5 years, beginning June 2024 and ending September 2027. Project construction is proposed to occur in the following sequence:

- Demolition (2 months);
- Site preparation (1 month);
- Grading (2 months);
- Building Construction (24 months); and
- Architectural Coating and Paving (10 months).

Grading for the proposed improvements would require approximately 10,000 cubic yards of cut and fill and approximately 10,000 cubic yards of export. The Project site would be graded to mimic the existing grading and drainage patterns. The overall site grading and drainage pattern would be southeasterly towards Normandie Avenue.

The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower (**PDF AQ-1. Nonroad Diesel Engines**). Additionally, prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to the City for review and approval (**PDF TR-1. Construction Traffic Management Plan**). The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan would include, but not be limited to, the following measures:

- Identified routes for vehicular traffic, bicyclists, and pedestrians around traffic lane, parking lane, and/or sidewalk closures, as they are required;



- Provisions to ensure that access remains unobstructed for land uses near the Project site during construction;
- Provisions to accommodate parking for construction workers either on-site or at off-site, off-street locations. Parking would be prohibited on streets in the Project site vicinity; and
- Prior to the start of construction, the Applicant would coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

2.5 GOALS AND OBJECTIVES

Pursuant to State CEQA Guidelines §15124(b), the EIR project description must include “[a] statement of objectives sought by the proposed project...The statement of objectives should include the underlying purpose of the Project.”

The Project objectives, as referenced in the Draft Normandie Crossing Specific Plan, are:

1. Diversify the City of Gardena’s existing housing options, by providing a range of housing types and sizes, to serve the region’s growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.
2. Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish housing development that meets high standards of design and pursues environmental sustainability.
5. Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City’s Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The City, as Lead Agency for the Project, has discretionary authority over the Project. To implement the Project, the Applicant would need to obtain, at a minimum, the following discretionary permits/approvals:

- General Plan/General Plan Map Amendment (GPA #3-21):
 - Concerning the NCSP area, a General Plan amendment to: (i) change the land use designation on the General Plan Land Use Map from “Industrial” and “Industrial, High Density 30 Overlay” to “Specific Plan” and (ii) amend the Land Use Plan text and Land Use Plan Table LU-3 to allow the mix of uses and densities specified in the NCSP;



- Concerning the residential parcel at 16964 West 179th Street, a General Plan amendment to change the land use designation on the General Plan Land Use Map from Industrial to Single-Family Residential; and rezone from General Industrial Zone (M2) to Single Family Residential Zone (R-1) consistent with existing residential land use.
- Concerning the Union Pacific Railroad parcel immediately adjacent and east of the Project site, a General Plan amendment to change the land use designation on the General Plan Land Use Map from Industrial to Public/Institutional.
- Zone Change and Zone Map Amendment (ZC #4-21):
 - Concerning the NCSP area, a zoning map amendment to change the zones on the Zoning Map from Industrial (M-1) Zone with a High Density 30 Overlay and General Industrial (M-2) Zone to Normandie Crossing Specific Plan Zone;
 - Concerning the residential parcel at 16964 West 179th Street, a zoning map amendment to change the zone on the Zoning Map from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone; and
 - Concerning the Union Pacific Railroad parcel immediately adjacent and east of the Project site, a zoning map amendment to change the zone on the Zoning Map from General Industrial (M-2) Zone to Official (O).
- Zoning Text Amendment (ZTA #6-21): A GMC zoning text amendment to add Normandie Crossing Specific Plan;
- Normandie Crossing Specific Plan (NCSP) (SP #1-21);
- Site Plan Review (SPR #11-21): Review of the development's physical design;
- Vesting Tentative Tract Map (TTM #4-21): A vesting TTM to combine four lots into two and create one parcel for the apartment building and one parcel for the townhome-style buildings with the ability to create condominiums on the 75 townhome-style units;
- Development Agreement (DA #2-21): The development agreement would guarantee that the Specific Plan's terms would not be amended for a set period of years without the Developer's consent and would include the benefits to the City including affordable housing and sidewalk improvements along 169th Street, outside the Project boundaries;
- Affordable Housing Agreement to guarantee five (5) percent affordable housing for a period of 55 years; and
- Environmental Assessment (EA #20-21).

In addition to the above City approvals, the Project also requires that the Applicant, in collaboration with the City and UPRR, request from the CPUC authorization to modify the rail crossing pursuant to CPUC General Order 88-B requirements.



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An architectural rendering of a modern multi-story apartment complex. The central courtyard features a rectangular swimming pool with a wooden deck, surrounded by lounge chairs and a small table. The pool is enclosed by a glass railing. The surrounding buildings have balconies and large windows. In the foreground, there are rooftop decks with wooden flooring and some greenery. The overall scene is bright and modern.

3.0 BASIS OF CUMULATIVE ANALYSIS



3.0 BASIS OF CUMULATIVE ANALYSIS

3.1 INTRODUCTION

A project's cumulative impact is "an impact to which that project contributes and to which other projects contribute as well. The Project must make some contribution to the impact; otherwise, it cannot be characterized as a cumulative impact of that project."¹ Under CEQA's cumulative impact analysis requirements, the pertinent question is not whether there is a significant cumulative impact but whether the effects of an individual project are cumulatively considerable. Thus, the analysis must assess whether the additional amount of impact resulting from the proposed Project should be considered significant in the context of the existing cumulative effect. Importantly, this does not mean that any contribution to a cumulative impact should be considered cumulatively considerable.

State CEQA Guidelines §15355 provides the following definition of cumulative impacts:

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

State CEQA Guidelines §15130(a) further addresses the discussion of cumulative impacts, as follows:

- (1) As defined in §15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.
- (2) When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

¹ *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 700.



- (3) An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

Pursuant to State CEQA Guidelines §15130(b), the discussion of cumulative impacts shall be guided by the standards of practicality and reasonableness, and should include the following elements:

- (1) Either:
 - (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
 - (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projects may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.
- (2) When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.
- (3) Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.
- (4) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.
- (5) A reasonable analysis of the cumulative impacts of the relevant projects, including examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects."



3.2 CUMULATIVE PROJECT LIST

The cumulative study area varies from one environmental topic to another depending upon the nature of impacts related to the topic. For example, cumulative aesthetic considerations encompass only the surrounding areas with direct views of the Project site, while air quality is a regional issue that is analyzed on a broader scale. To determine the Project's potential cumulative impacts, this EIR includes the use of a list of past, present, and future projects obtained from the City of Gardena; see **Table 3-1: List of Cumulative Projects** and **Exhibit 3-1: Cumulative Project Locations**. As indicated in **Table 3-1**, the related projects collectively include 1,132 DU and approximately 654,538 SF of non-residential land uses. The cumulative development, inclusive of the proposed Project, includes 1,535 DU and approximately 654,538 SF of non-residential land uses.

The cumulative impacts analyses are provided in **Sections 4.1: Air Quality** through **4.16: Aesthetics**. These analyses describe the potential environmental changes to the existing physical conditions that may occur as a result of the Project together with the cumulative projects listed in **Table 3-1**. Not all related projects would contribute to significant cumulative impacts for each topical area. For example, not all cumulative projects would have noise impacts. The cumulative impact analyses in each topical area provides an evaluation of the cumulative projects and how these would contribute to cumulative impacts. Some of the impacts are very site-specific and would not compound the impacts associated with the Project. In other cases, short-term impacts would not contribute to cumulative impacts because the construction of the cumulative Project and the development of the Project would not occur in the same time period or be near to each other; **Table 3-2: Geographic Context for Cumulative Analysis** presents the geographic context for each environmental issue area.



Table 3-1: List of Cumulative Projects

ID	Type	Location (Project Name) ¹	Description	Distance to Project Site (miles)	Non- Residential (SF)	Residential (DU)
City of Gardena						
1	Commercial	15106 South Western Avenue	Commercial (Restaurant) & Drive-thru	1.17	3,720	-
2	MFR ²	1333 West 168 th Street	Condominiums	0.14 ³	-	3
3	Residential	1348 West 168 th Street (Normandie Courtyard Project)	Small Lot Subdivision, 3-Story	0.08 ⁴	-	9
4	Residential	13919 Normandie Avenue	Single-Room Occupancy	1.91	-	20
5	MFR	12850 Crenshaw Boulevard (GTOD SP Project)	Apartments	2.95	-	265
6	MFR	1938 West 146 th Street	Townhomes	1.60	-	6
7	Residential	13126 South Western Avenue	Single-Room Occupancy, 7 DU Affordable	2.50	-	121
8	MFR	2545 Marine Avenue	Townhomes, 2 DU Affordable	1.70	-	22
9	MFR	1031 Magnolia Avenue	Townhomes	0.88	-	6
10	MFR	2800 Rosecrans Avenue	Townhomes, 4 DU Live-Work	2.20	-	20
11	Industrial	1600 West 135 th Street	Warehouse	2.10	190,860	-
12	Industrial	1450 West Artesia Boulevard	Self-Storage/ Warehouse	0.30	268,000	-
13	Commercial	14206 Van Ness Avenue	Self-Storage/ Warehouse	2.00	177,573	-
			Office	2.00	8,000	-
14	Mixed-Use	14600 Western Avenue	Apartments & Commercial (Retail)	1.50	3,000	196
15	MFR	1515 West 178 th Street (Melia 178th Street Project)	Townhomes	0.50	-	114
16	Mixed-Use	1341 West Gardena Boulevard	Apartments & Commercial (Retail/Office)	0.30	3,385	14
17	MFR	1621 West 147 th Street	Townhomes, 3-Story	1.40	-	6



ID	Type	Location (Project Name) ¹	Description	Distance to Project Site (miles)	Non-Residential (SF)	Residential (DU)
18	MFR	1335 West 141 st Street	Townhomes, 3-Story	1.80	-	50
19	Mixed-Use	2129 West Rosecrans Avenue	Townhomes, 3-Story, 15 DU Live-Work	2.00	-	113
20	MFR	13615 South Vermont Avenue	Townhomes, 2 DU Affordable	2.10	-	84
21	MFR	2500-2508 Rosecrans Avenue	Townhomes, 3 DU Live-Work	2.00	-	53
22	MFR	15717 & 15725 Normandie Avenue	Townhomes, 3 DU Affordable	0.70	-	30
23	MFR	1610 Artesia Boulevard ⁵	Multi-Family Apartments	0.60	-	300
Total Related Projects					654,538	1,432
-	MFR	Proposed Project 16911 South Normandie Avenue	Apartments	-	-	328
			Townhomes	-	-	75
Total Proposed Project					0	403
Total Cumulative Project					654,538	1,835
<p>Notes:</p> <ol style="list-style-type: none"> Color Legend: <ol style="list-style-type: none"> Green fill – project is approved and not constructed; Gold fill – project is approved and under construction; and Blue fill – project is not approved and application in review. MFR = Multi-Family Residential This related project is approximately 720 feet northeast of Project site. This is second nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review anticipated expiration November 2023. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023) This related project is approximately 400 feet northeast of Project site. Nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review has expired. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023). Pre Application received, however, formal application is anticipated. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023) <p>Source: A. Acuna, City of Gardena, Personal Email Communications, March 13, 2023, and June 15, 2023.</p>						

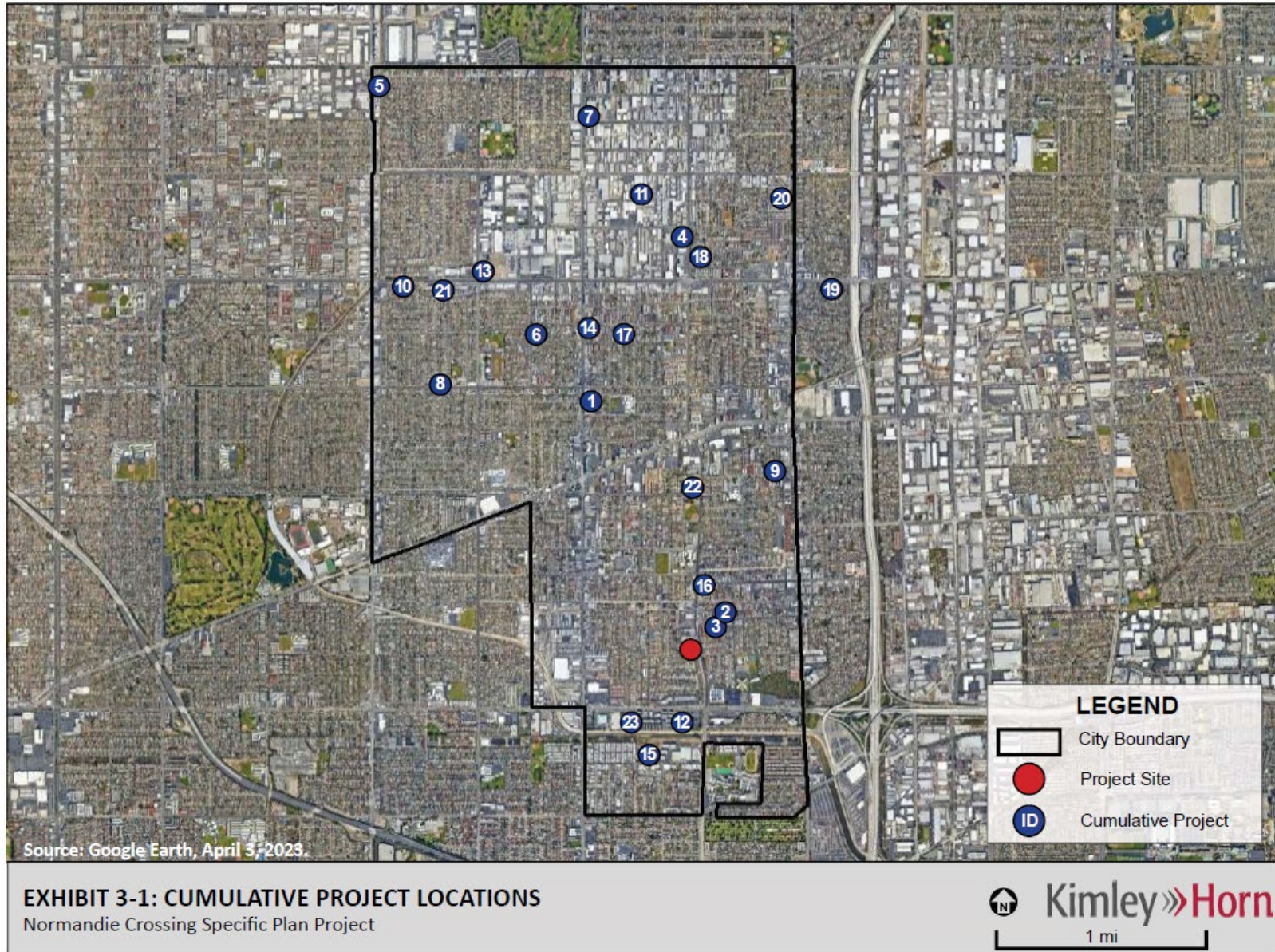


Table 3-2: Geographic Context for Cumulative Analysis

Environmental Topic Area	Description
Air Quality	South Coast Air Basin
Cultural Resources	Historic Resources: 500-Foot Radius of Project site Archaeological Resources: 0.5-Mile Radius of Project site
Energy	County of Los Angeles
Geology and Soils (Paleontological Resources)	City of Gardena
Greenhouse Gas Emissions	Global
Hazards and Hazardous Materials	1.0-mile Radius of Project site
Hydrology and Water Quality	Dominguez Watershed
Land Use and Planning	City of Gardena
Noise ^{2,3}	1,000-foot Radius of Project site
Population and Housing	City of Gardena, County of Los Angeles, and SCAG Planning Region
Public Services	Fire Protection: Los Angeles County Fire Department (LACFD) Service Area Police Protection: City of Gardena (i.e., Gardena Police Department Service Area) Schools: Los Angeles Unified School District (LAUSD) Libraries: Los Angeles County Library service area
Recreation	City of Gardena
Transportation	Transit Facilities: GTrans Service Area, Torrance Transit Service Area, and Metro Service Area Roadway, Bicycle, and Pedestrian Facilities: City of Gardena Vehicle Miles Traveled: City of Gardena
Tribal Cultural Resources	0.5-Mile Radius of Project site
Utilities and Service Systems	Water: Golden State Water Company (GSWC) Service Area Sewer: Los Angeles County Sanitation District (LACSD) Electric Power: Southern California Edison (SCE) Service Area Natural Gas: Southern California Gas Company (SoCalGas) Service Area Solid Waste: County of Los Angeles

² City of Los Angeles. (2006). *L.A. CEQA Thresholds Guide*. Retrieved from: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf> , accessed June 2023.

³ The City of Gardena currently does not have construction noise screening criteria, thus, the City of Los Angeles CEQA Threshold Guide screening criteria was used to determine the geographic context for noise; see **Section 4.9: Noise** for additional information regarding the geographic context.





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An architectural rendering of a modern, multi-story apartment building. The building features a mix of light-colored facades and dark window frames. A central courtyard is the focal point, containing a rectangular swimming pool with a wooden deck, lounge chairs, and a small table. The pool is surrounded by a glass safety fence. In the foreground, there are several rooftop terraces with wooden decking and greenery. The overall scene is bright and clear, suggesting a sunny day.

4.0 ENVIRONMENTAL ANALYSIS



4.0 ENVIRONMENTAL ANALYSIS

The following EIR subsections describe the existing environmental and regulatory settings, evaluate the Project’s potential environmental impacts (including direct and indirect, short-term, long-term, and cumulative), recommend mitigation measures, and identify unavoidable significant impacts, if any. **Sections 4.1: Air Quality** through **4.16: Aesthetics** analyze those environmental resource areas where potentially significant impacts could occur, based on Initial Study findings, as stated in the Notice of Preparation; see **Appendix 1.0-1: Initial Study, Notice of Preparation, and Comment Letters**.

This EIR examines environmental factors outlined in State CEQA Guidelines Appendix G Environmental Checklist Form, for the following issue areas:

- | | |
|---|------------------------------------|
| 4.1 Air Quality | 4.9 Noise |
| 4.2 Cultural Resources | 4.10 Population and Housing |
| 4.3 Energy | 4.11 Public Services |
| 4.4 Geology and Soils (Paleontological Resources) | 4.12 Recreation |
| 4.5 Greenhouse Gas Emissions | 4.13 Transportation |
| 4.6 Hazards and Hazardous Materials | 4.14 Tribal Cultural Resources |
| 4.7 Hydrology and Water Quality | 4.15 Utilities and Service Systems |
| 4.8 Land Use and Planning | 4.16 Aesthetics |

As set forth in the Initial Study, the environmental issues related to agriculture and forestry resources, biological resources, mineral resources, and wildfire were found to result in no impacts or less than significant impacts; see **Section 7.0: Effects Found Not to be Significant**. Additionally, certain issues associated with aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, and population and housing are also included in **Section 7.0: Effects Found Not to be Significant**. based on Initial Study findings.

Each potentially significant environmental issue area is addressed in a separate EIR section and is organized into the following subsections, as follows:

- “Introduction” briefly introduces the section’s purpose, environmental issues that would be addressed, and key source documentation used to prepare the analysis.
- “Existing Setting” describes the physical conditions in the Project’s vicinity that exist at the time the Notice of Preparation was published (May 9, 2023) and that may influence or affect the issue under investigation.



- “Regulatory Setting” discusses the laws, ordinances, regulations, and standards applicable to the Project.
- “Significance Criteria and Thresholds” provides the thresholds that are the basis of conclusions of significance, which are primarily the criteria in State CEQA Guidelines Appendix G (14 California Code of Regulations §§15000-15387).

Primary sources used in identifying the criteria include the State CEQA Guidelines; local, state, federal, or other standards applicable to an impact category; and officially established significance thresholds. “. . . An ironclad definition of significant effect is not possible because the significance of any activity may vary with the setting” (State CEQA Guidelines §15064(b)). Principally, “. . . a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance” constitutes a significant impact (State CEQA Guidelines §15382).

- “Impacts and Mitigation Measures” describes potential environmental changes to the existing physical conditions that may occur if the Project is implemented. Evidence, based on factual and scientific data, is presented to show the cause-and-effect relationship between the Project and the potential environmental changes. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained, to the extent possible, to determine whether impacts may be significant; all of the potential direct and reasonably foreseeable indirect effects are considered.

“Mitigation Measures are measures that would be required of the Project to avoid a significant adverse impact; to minimize a significant adverse impact; to rectify a significant adverse impact by restoration; to reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or to compensate for the impact by replacing or providing substitute resources or environment.

- “Cumulative Impacts” describes potential environmental changes to the existing physical conditions that may occur as a result of the Project together with all other reasonably foreseeable, planned, and approved future projects producing related or cumulative impacts; see also **Section 3.0: Basis for Cumulative Analysis**.
- “Significant Unavoidable Impacts” describes impacts that would be significant and cannot be feasibly mitigated to less than significant, and thus would be unavoidable. To approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the lead agency is required to balance the benefits of a project against its unavoidable environmental impacts in determining whether to approve the project. If a project’s benefits are found to outweigh the unavoidable adverse environmental effects, the adverse effects may be considered “acceptable” (State CEQA Guidelines §15093(a)).
- “References” identifies the sources used in and throughout the subsection.

4.1 AIR QUALITY





4.1 AIR QUALITY

The purpose of this section is to describe the existing air quality-related environmental and regulatory settings and evaluate the Project's potential to conflict with or obstruct implementation of the applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions such as those leading to odors adversely affecting a substantial number of people. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based primarily on air quality data provided in the following sources:

- *Air Quality Technical Report, Normandie Crossing Specific Plan Project* ("Air Quality Report") (Ramboll Americas Engineering Solutions, Inc., July 2023); **Appendix 4.1-1: Air Quality Technical Report.**
- *Normandie Crossing Specific Plan Project, Construction Health Risk Assessment* ("Health Risk Assessment") (Air Quality Dynamics, July 2023); **Appendix 4.1-2: Health Risk Assessment.**

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Air Quality Report and Health Risk Assessment; see **Appendix 4.1-1 and Appendix 4.1-2.** The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.1.1 EXISTING SETTING

Climate and Meteorology

The California Air Resources Board (CARB) divides the state into 15 air basins that share similar meteorological and topographical features. The Project site is located within the South Coast Air Basin (Air Basin). The Air Basin is an approximately 6,745-square-mile area bordered by the San Gabriel Mountains to the north, Santa Margarita Peak to the south, the San Jacinto and San Bernardino Mountains to the east, and the Pacific Ocean to the west.¹ The Air Basin consists of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside counties. Air quality in this area is determined by natural factors such as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The Air Basin lies in the eastern Pacific Ocean's semi-permanent high-pressure zone. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana

¹ South Coast Air Quality Management District. (2016). *Air Quality Management Plan*. page 1-4.



winds. The extent and severity of criteria pollutant concentrations in the Air Basin is a function of the area’s natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin’s meteorological conditions, in combination with regional topography, are particularly conducive to the formation and retention of ozone (O₃), which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Therefore, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the Air Basin’s emissions, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. The Air Basin’s pollutant concentrations vary with location, season, and time of day. O₃ concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.

Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by state and federal laws. These regulated air pollutants are known as “criteria air pollutants” (“CAPs”) and are categorized into primary and secondary pollutants.

Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_x), sulfur dioxide (SO₂), coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead are primary air pollutants. Of these, CO, NO_x, SO₂, PM₁₀, and PM_{2.5} are criteria pollutants. ROG and NO_x are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant O₃ is formed by a chemical reaction between ROG and NO_x in the presence of sunlight. O₃ and nitrogen dioxide (NO₂) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 4.1-1: Air Contaminants and Associated Public Health Concerns**.

Table 4.1-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources ¹	Human Health Effects ²
Particulate Matter (PM ₁₀ and PM _{2.5})	Can be emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks, or fires. Although, most particles form in the atmosphere as a result of complex reactions of chemicals such as sulfur dioxide and nitrogen oxides, which are emitted from power plants, industries and automobiles.	Short-term: increase in mortality rates; increase in respiratory infections; increase in number and severity of asthma attacks; COPD exacerbation; increase in combined respiratory-diseases and number of hospital admissions; increased mortality due to cardiovascular or respiratory diseases; increase in hospital admissions for acute respiratory conditions; increase in school absences; increase in lost



Table 4.1-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources ¹	Human Health Effects ²
		<p>workdays; decrease in respiratory function in children; increase medication use in children and adults with asthma.</p> <p>Long-term: reduced lung function growth in children; changes in lung development; development of asthma in children; increased risk of cardiovascular diseases; increased total mortality from lung cancer; increased risk of premature death.</p> <p>Possible link to metabolic, nervous system, and reproductive and developmental effects for short-term and long-term exposure to PM_{2.5}.</p>
Ozone (O ₃)	<p>Created by chemical reactions between oxides of nitrogen (NO_x) and volatile organic compounds (VOC)¹. This happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight.</p>	<p>Pulmonary function decrements and localized lung injury in humans and animals; asthma exacerbation; chronic obstructive pulmonary disease (COPD) exacerbation; respiratory infection; increased school absences, and hospital admissions and emergency department (ED) visits for combined respiratory diseases; increased mortality; possible metabolic effects.</p> <p>Vegetation damage; property damage.</p>
Sulfur Dioxide (SO ₂)	<p>The largest source of SO₂ in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities. Smaller sources of SO₂ emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content. SO₂ emissions that lead to high concentrations of SO₂ in the air generally also lead to the formation of other sulfur oxides (SO_x). SO_x can react with other compounds in the atmosphere to form small particles. These particles contribute to PM pollution.</p>	<p>Respiratory symptoms (bronchoconstriction, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma.</p> <p>Possible allergic sensitization, airway inflammation, asthma development.</p>
Carbon Monoxide (CO)	<p>A colorless, odorless gas that is released when something is burned. The greatest sources of CO to outdoor air are cars, trucks and other vehicles or machinery that burn fossil fuels. A variety of</p>	<p>Visibility reduction. Aggravation of angina pectoris and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; possible</p>



Table 4.1-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources ¹	Human Health Effects ²
	household items such as unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves also release CO and can affect air quality indoors.	impairment of central nervous system functions; possible increased risk to fetuses; possible increased risk of pulmonary disease; possible emergency department visits for respiratory diseases overall and visits for asthma.
Nitrogen Dioxide (NO ₂)	NO ₂ is primarily emitted in the air from the burning of fuel from cars, trucks and buses, power plants, and off-road equipment. NO ₂ can react with other chemicals in the air to form both PM and ozone.	<p>Short-term: asthma exacerbations (“asthma attacks”)</p> <p>Long-term: asthma development; higher risk of all-cause, cardiovascular, and respiratory mortality.</p> <p>Both short and long term NO₂ exposure is also associated with chronic obstructive pulmonary disease (COPD) risk.</p> <p>Potential impacts on cardiovascular health, mortality and cancer, aggravate chronic respiratory disease.</p> <p>Contribution to atmospheric discoloration.</p>
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. Two major sources of lead in the air are metals and ore processing and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. Today the highest air concentrations of lead are usually found near lead smelters as a result of EPA's regulatory efforts in the removal of lead from motor vehicle gasoline.	<p>Learning disabilities; impairment of blood formation and nerve function; cardiovascular effects, including coronary heart disease and hypertension.</p> <p>Possible male reproductive system effects.</p>
<p>Notes:</p> <ol style="list-style-type: none"> 1. Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROG and VOCs. Both ROG and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation). 2. List of health and welfare effects is not comprehensive; detailed health effects information can be found in the U.S. EPA National Ambient Air Quality Standards (NAAQS) documentation at https://www.epa.gov/naaqs. 		
<p>Source:</p> <ol style="list-style-type: none"> 1. United States Environmental Protection Agency (U.S. EPA), Criteria Air Pollutants, Accessed May 15, 2023. 2. South Coast Air Quality Management District, <i>Air Quality Management Plan</i>, 2022; California Air Resources Board, <i>Ambient Air Quality Standards and Key Health and Welfare Effects</i>, December 2, 2022. 		

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer-causing) adverse human health effects (i.e., injury or



illness). TACs include both organic and inorganic chemical substances. They may be emitted from various common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

CARB identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Ambient air quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the state. Within the Air Basin, the South Coast Air Quality Management District (South Coast AQMD) maintains the air quality stations to measure ambient pollutant concentrations. The monitoring station most representative of the Project site is the Southwest Coastal Los Angeles County Monitoring Station. Criteria pollutants monitored at this station include PM_{2.5}, O₃, PM₁₀, and CO. The next most representative station is the South Central Los Angeles County Monitoring Station. Criteria pollutants monitored at this station include CO, O₃, NO₂, PM_{2.5}, and lead.

Existing Site Emissions

Table 2.2-1: Existing Onsite Structure Summary summarizes the existing onsite land uses by address and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. However, approximately 9,324 SF of industrial floor area is in a dilapidated condition, thus, is not being used or occupiable. Therefore, approximately 106,100 SF of the existing industrial land uses are currently operating. The estimated criteria pollutant emissions from the existing 106,100 SF of active industrial land uses were estimated using the California Emission Estimator Model (CalEEMod) and are identified in **Table 4.1-2: Maximum Daily Net Criteria Air Pollutant Emission Estimates For Existing Conditions**.

Sensitive Receptors and Locations

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are near localized sources of toxics are of particular concern.



Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The sensitive receptors nearest the Project site are the residential uses located north of West 169th Street, south of West 170th Street, east of South Normandie Avenue, and west of Brighton Way.

**Table 4.1-2: Maximum Daily Net Criteria Air Pollutant Emission Estimates
For Existing Conditions**

Emission Source	Maximum Daily Criteria Air Pollutant Emissions ^{1,3} (lb/day)					
	VOC ^{2,3}	NO _x	CO	SO _x	PM ₁₀ ⁴	PM _{2.5} ⁴
Existing Conditions⁴						
Area	2.40	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.10	0.10	0.00	0.01	0.01
Mobile	0.70	1.00	8.00	0.02	1.65	0.45
Total	3.10	1.10	8.10	0.02	1.66	0.46
Notes:						
1 Numbers are rounded for reporting purposes. The sum of the emissions may not add up due to rounding.						
2 For purposes of this analysis VOC emissions are assumed to be equal to ROG.						
3 CalEEMod = California Emissions Estimator Model; CAP = criteria air pollutant; CO = carbon monoxide; EMFAC = Emission Factors model; lb = pounds; NO _x = nitrogen oxides; PM _{2.5} = particulate matter less than 2.5 microns in diameter; PM ₁₀ = particulate matter less than 10 microns in diameter; ROG = reactive organic gases; South Coast AQMD = South Coast Air Quality Management District; SO _x = oxides of sulfur; VOC = volatile organic compounds						
4 PM emissions for mobile sources are estimated as a sum of exhaust emissions, tire wear, brake wear, and entrained road dust.						
5 Emissions for existing conditions were estimated using CalEEMod. See Appendix 4.1-1 for CalEEMod outputs.						
6 South Coast AQMD Air Quality Significance Thresholds.						
Source: Ramboll US Corporation. (2023). See Appendix 4.1-1 .						

4.1.2 REGULATORY SETTING

Federal

Federal Clean Air Act

The Federal Clean Air Act (FCAA) of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the U.S. Environmental Protection Agency (U.S. EPA) is responsible for implementation of certain portions of the Clean Air Act including mobile source requirements. Other portions of the Clean Air Act, such as stationary source requirements, are implemented by state and local agencies.

The Clean Air Act establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The Clean Air Act also mandates that the state submit and implement a State Implementation Plan (SIP) for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the Clean Air Act identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a



demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones.

In addition to criteria pollutants, Title I of the Act also includes air toxics provisions which require the U.S. EPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, the U.S. EPA establishes National Emission Standards for Hazardous Air Pollutants. The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the U.S. EPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles which have strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially, and the specification requirements for cleaner-burning gasoline are more stringent.

State

California Clean Air Act

CARB administers air quality policies for the state of California. The California Clean Air Act (CCAA) requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The AQMPs also serve as the basis for the preparation of the SIP for meeting NAAQS for the state. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. The CAAQS apply to the same criteria pollutants as the FCAA but also include state-identified criteria pollutants. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc., are not considered violations of a state standard, and are not used as a basis for designating areas as nonattainment. The CAAQS are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.



identifies the CAAQS and NAAQS. The Air Basin is currently designated as a nonattainment area with respect to the states O_3 , PM_{10} , and $PM_{2.5}$ standards, as well as the federal 8-hour O_3 and $PM_{2.5}$ standards. The Air Basin is designated as in attainment or unclassified for the remaining CAAQS and NAAQS.



Table 4.1-3: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards ¹	Federal Standards ²
Ozone (O ₃) ^{2,5,7}	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m ³)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)
	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)
Nitrogen Dioxide (NO ₂)	1 Hour	0.18 ppm (339 µg/m ³)	100 ppb ¹¹
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)
Sulfur Dioxide (SO ₂) ⁸	24 Hour	0.04 ppm (105 µg/m ³)	NA
	1 Hour	0.25 ppm (655 µg/m ³)	75 ppb
Respirable Particulate Matter (PM ₁₀) ^{1,3,6}	24-Hour	50 µg/m ³	150 µg/m ³
	Annual Arithmetic Mean	20 µg/m ³	NA
Fine Particulate Matter (PM _{2.5}) ^{3,4,6,9}	24-Hour	NA	35 µg/m ³
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³
Sulfates (SO ₄₋₂)	24 Hour	25 µg/m ³	NA
Lead (Pb) ^{10,11}	30-Day Average	1.5 µg/m ³	NA
	Rolling 3-Month Average	NA	0.15 µg/m ³
Hydrogen Sulfide (H ₂ S)	1 Hour	0.03 ppm (0.15 µg/m ³)	NA
Hydrogen Sulfide (H ₂ S) ¹⁰	1 Hour	0.03 ppm	NA

ppm = parts per million; - parts per billion by volume (0.01 ppm = 10 ppb); µg/m³ = micrograms per cubic meter; mg/m³ = milligrams per cubic meter; – = no information available.

¹ State standards are values that are not to be exceeded. These standards are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead, PM₁₀, PM_{2.5}, and NO₂ annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average.

² Federal standards shown are the "primary standards" designed to protect public health. Federal standards other than for O₃, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O₃ standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O₃ standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM₁₀ standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m₃. The 24-hour PM_{2.5} standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m³.

³ Except for the Federal particulate standards, annual standards are met if the annual average falls below the standard at every site. The Federal annual particulate standard for PM₁₀ is met if the 3-year average falls below the standard at every site. The annual PM_{2.5} standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard. NAAQS are set by the U.S. EPA at levels determined to be protective of public health with an adequate margin of safety.

⁴ On October 1, 2015, the Federal 8-hour O₃ primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O₃ concentration per year, averaged over three years, is equal to or less than 0.070 ppm. U.S. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O₃ level in the area.

⁵ The Federal 1-hour O₃ standard was revoked by the U.S. EPA on June 15, 2005.

⁶ In June 2002, CARB established new annual standards for PM_{2.5} and PM₁₀.

⁷ The 8-hour California O₃ standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.

⁸ On June 2, 2010, the U.S. EPA established a new 1-hour SO₂ standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO₂ NAAQS however must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO₂ NAAQS.

⁹ The PM_{2.5} standards currently in effect are the 2006 24-hour standard of 35 µg/m³, and the 2013 annual standard of 12 µg/m³. The U.S. EPA last reviewed the PM_{2.5} and ozone standards in 2020 and decided to retain them at their current levels. However, the present administration is re-evaluating the 2020 review and expects to finalize that re-evaluation within the next few years.

¹⁰ CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.

¹¹ Federal lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: South Coast Air Quality Management District, *Air Quality Management Plan, 2022*; California Air Resources Board, *Ambient Air Quality Standards and Key Health and Welfare Effects, December 2, 2022*.



Regional

South Coast Air Quality Management District

The South Coast AQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles. All projects are subject to South Coast AQMD rules and regulations in effect at the time of construction.

The South Coast AQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The South Coast AQMD Governing Board adopted the most recent AQMP on December 2, 2022. The 2022 AQMP addresses the 1997 8-hour and 2008 8-hour ozone standards, as well as PM_{2.5} standards. This document focuses on attaining the 2015 8-hour ozone standard of 70 parts per billion (ppb). The AQMP incorporates the latest scientific and technological information and planning assumptions, including the *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy) (2020-2045 RTP/SCS)* and updated emissions inventory methodologies for various source categories. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide and the 2020-2045 RTP/SCS. The RTP/SCS was determined to conform to the federally mandated SIP for attainment and maintenance of the NAAQS. The 2020-2045 RTP/SCS has been incorporated into the 2022 AQMP. Both the Regional Comprehensive Plan and Guide and the AQMP are based, in part, on projections originating with county and city general plans.

The South Coast AQMD has published the CEQA Air Quality Handbook (approved by the South Coast AQMD Governing Board in 1993 and augmented with guidance for Localized Significance Thresholds [LST] in 2008). The South Coast AQMD guidance helps local government agencies and consultants develop environmental documents required by CEQA and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operations. With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how existing and proposed projects affect air quality in order to meet the requirements of the CEQA review process. The South Coast AQMD periodically provides supplemental guidance and updates to the Handbook on their website.



4.1.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning air quality. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant effect on the environment if it would:

- Conflict with or obstruct implementation of the applicable air quality plan (see Impact 4.1-1)
- 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 (see Impact 4.1-2)
- Expose sensitive receptors to substantial pollutant concentrations (see Impact 4.1-3)
- Result in other emissions such as those leading to odors adversely affecting a substantial number of people (see Impact 4.1-4)

South Coast AQMD Thresholds. The significance criteria established by South Coast AQMD may be relied upon to make the above determinations. According to the South Coast AQMD, an air quality impact is considered significant if the 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 South Coast AQMD has established thresholds of significance for a land use development project’s air quality during construction- and operational-related activities, as shown in **Table 4.1-4: South Coast Air Quality Management District Emissions Thresholds.**

Table 4.1-4: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Construction-Related (lbs/day)	Operational-Related (lbs/day)
Reactive Organic Gases (ROG)/Volatile Organic Compounds (VOC)	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
Lead	3	3

Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, March 2023.

Localized Carbon Monoxide. In addition to the daily thresholds listed above, the Project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near the Project site are above the state and federal CO standards (the more stringent



state standards are 20 ppm for 1-hour and 9 ppm for 8-hour). The SCAB has been designated as in attainment under the 1-hour and 8-hour standards.

4.1.4 PROJECT DESIGN FEATURES

The following Project design features (PDF) were incorporated into the analysis:

- **PDF AQ-1. Nonroad Diesel Engines:** The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower.²
- **PDF AQ-2/PDF GHG-1. Electrical Vehicle Charging Design:** The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.³
- **PDF AQ-3/PDF GHG-2. All-Electric:** There would be no natural gas use by any of the Project land uses.⁴

4.1.5 IMPACTS AND MITIGATION MEASURES

Impact 4.1-1:

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

Level of Significance: Less than Significant Impact

As previously discussed, as part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the NAAQS. 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 CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the CAAQS and NAAQS. South Coast AQMD’s AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and achieving CAAQS and NAAQS. The SCAQMD’s CEQA Handbook identifies two key indicators of consistency with the AQMP:

² The Project construction emissions inventory quantified this measure.

³ The Project operational emissions inventory did not quantify this measure, but it has been included here qualitatively.

⁴ The Project operational emissions inventory quantified this measure.



Consistency Criterion No. 1. Whether a project will result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 2. Whether a project will exceed the assumptions noted in the AQMP or increments based on the years of the project buildout phase.

According to the South Coast AQMD's CEQA Air Quality Handbook, the purpose of the consistency finding (Criterion No. 1 and Criterion No. 2) is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As identified in **Table 4.1-5: Construction Air Pollutant Emissions**, and **Table 4.1-6: Operational Air Pollutant Emissions**, the Project would not exceed construction or operational emission standards, respectively. The Project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Project would also comply with South Coast AQMD regulations for controlling fugitive dust pursuant to South Coast AQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, the Project is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The 2022 AQMP was prepared to accommodate growth, reduce pollutant levels within the areas under the jurisdiction of South Coast AQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the AQMP's formulation.

Table 4-8.2: Existing General Plan Land Use Designations summarizes the Project site's existing land use designations and maximum allowable development capacity by APN and address. As indicated in **Table 4.8-2: Existing General Plan Land Use Designations**, the Project site's maximum development capacity, based on the existing land use designations (i.e., Industrial, with a High Density 30 Overlay over the northern portion), is 40 DU (on the northerly portion) and/or approximately 228,690 SF of industrial floor area. However, because the City only recently (i.e., February 2023) adopted this overlay, Connect SoCal and the AQMP do not account for residential uses or associated population on the Project site.

As discussed in **Section 4.8: Land Use and Planning**, the Project would require a General Plan Amendment to change the land use designation on the General Plan Land Use Map from "Industrial, with a High Density 30 Overlay" over the northern portion, to "Specific Plan" to allow



for the proposed residential uses. As such, excluding the previously planned 40 DU, the Project would result in a forecast population growth of approximately 1,088 persons, or approximately 1.7 percent of the General Plan’s forecast population of 63,799 persons at buildout, and approximately 1.6 percent over Connect SoCal’s forecast 2045 population of 65,700 persons by 2045. Although the Project would include a General Plan Amendment, the forecast population growth resulting from the land use change would be nominal and is not considered substantial concerning Connect SoCal’s forecasted growth; see **Section 4.11: Population and Housing**. Also, the Project site’s existing non-residential (i.e., industrial) development capacity of approximately 228,690 SF, which is accounted for in Connect SoCal and the AQMP, would be removed with the Project’s proposed General Plan amendment. Further, the Project would not exceed South Coast AQMD’s significance thresholds. Therefore, the Project is consistent with the second criterion. Because the Project is consistent with the South Coast AQMD consistency finding criteria, the Project would not conflict with or obstruct implementation of the AQMP. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

<p>Impact 4.1-2: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?</p>
<p><i>Level of Significance: Less than Significant Impact</i></p>

Construction Emissions

Project construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern in the Project area are O₃-precursor pollutants (i.e., ROG and NO_x) and PM₁₀ and PM_{2.5}. Construction-related emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the South Coast AQMD’s thresholds of significance.

Construction results in the temporary generation of emissions resulting from demolition, 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 PM 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.

The duration of the Project’s construction activities is estimated to be approximately 3.5 years, beginning June 2024 and ending September 2027. 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 (see **Appendix 4.1-1** for more information regarding the construction assumptions used in this analysis). The Project’s construction-related maximum daily emissions are identified in **Table 4.1-5**. The Project would be subject to compliance with SCAQMD Rule 403 to minimize fugitive dust, which is incorporated into this analysis. As shown in **Table 4.1-5**, the Project’s construction-related CAP emissions would be below the SCAQMD’s mass daily significance thresholds. Therefore, the Project’s construction activities would result in a less than significant air quality impact.

Table 4.1-5: Construction Air Pollutant Emissions

Year	Maximum Daily Criteria Air Pollutant Emissions ^{1,2,3} (lb/day)					
	VOC ⁵	NO _x	CO	SO _x	PM ₁₀ ⁶	PM _{2.5} ⁶
2024	1.2	5.7	24.9	0.1	8.8	4.7
2025	1.4	4.0	27.3	0.1	3.6	1.0
2026	10.8	3.9	28.2	0.1	3.6	1.0
2027	10.8	2.6	27.7	0.1	3.5	1.0
Maximum Unmitigated⁷	11	6	28	0	9	5
SCAQMD Significance Threshold⁸	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

1. Numbers are rounded for reporting purposes. The sum of the emissions may not add up due to rounding.
2. Emissions shown here are based on Project-specific construction schedule and hauling material. CalEEMod defaults were used for on-site construction equipment mix and on-road vehicle trips. Emissions were estimated using CalEEMod. See **Appendix 4.1-1** for detailed CalEEMod outputs. Analysis assumes on-site fugitive dust control [watering three times daily during construction].
3. Project construction assumes the use of USEPA Tier 4 for construction equipment greater than 50 hp.
4. Numbers are rounded for reporting purposes.
5. For purposes of this analysis the VOC emissions are assumed to be equal to ROG.
6. PM emissions are estimated as a sum of exhaust, tire wear, brake wear, and fugitive dust emissions. PM fugitive dust emissions during construction include a 55% reduction (for watering at least two times daily to comply with SCAQMD Rule 403).
7. The maximum emissions reported for each pollutant may occur on different days. The sum of the emissions may not add up due to rounding.
8. SCAQMD Air Quality Significance Thresholds. Available at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.
CalEEMod = California Emissions Estimator Model; CO = carbon monoxide; lb = pounds; NO_x = nitrogen oxides; PM = particulate matter; PM₁₀ = particulate matter less than 10 microns in diameter; PM_{2.5} = particulate matter less than 2.5 microns in diameter; ROG = reactive organic gases; SCAQMD = South Coast Air Quality Management District; SO_x = oxides of sulfur; VOC = volatile organic compounds

Source: Ramboll US Corporation. (2023). See **Appendix 4.1-1**.

Operational emissions

The Project’s operational maximum daily emissions are summarized in **Table 4.1-6**. For CAPs, the emissions associated with the existing uses that would be removed are subtracted from the



Project’s mass emissions, to get the net mass emissions, which are then compared to the South Coast AQMD mass daily significance thresholds. The estimated emissions include on-site emissions from stationary sources and offsite emissions from on-road sources. The primary source of the operational CAP emissions (except VO) is traffic-related mobile sources. As shown in **Table 4.1-6: Operational Air Pollutant Emissions**, the Project’s operational CAP emissions would be below the SCAQMD’s mass daily significance thresholds. Therefore, Project operations would result in a less than significant air quality impact.

Table 4.1-6: Operational Air Pollutant Emissions

Emission Source	Maximum Daily Criteria Air Pollutant Emissions ¹ (lb/day)					
	VOC ²	NO _x	CO	SO _x	PM ₁₀ ³	PM _{2.5} ³
Project⁴						
Area	8.8	0.4	33.3	0.0	0.18	0.18
Energy ⁵	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	5.4	5.6	53.8	0.12	14.10	3.81
Total	14.2	6.0	87.1	0.1	14.3	4.0
Existing Conditions⁴						
Area	2.4	0.0	0.0	0.00	0.00	0.00
Energy	0.0	0.1	0.1	0.00	0.01	0.01
Mobile	0.7	1.0	8.0	0.02	1.65	0.45
Total	3.1	1.1	8.1	0.0	1.7	0.5
Project Minus Existing Conditions (Net Change)⁶						
Total Net Emissions	11	5	79	0	13	4
SCAQMD Significance Thresholds ⁶	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
1. Numbers are rounded for reporting purposes. The sum of the emissions may not add up due to rounding. 2. For purposes of this analysis VOC emissions are assumed to be equal to ROG. 3. PM emissions for mobile sources are estimated as a sum of exhaust emissions, tire wear, brake wear, and entrained road dust. 4. Emissions for Project and existing conditions were estimated using CalEEMod. See Appendix 4.1-1 for CalEEMod outputs. 5. There are zero energy criteria air pollutant emissions for Full Buildout Operations as there is no natural gas usage. 6. South Coast AQMD Air Quality Significance Thresholds. 7. CalEEMod = California Emissions Estimator Model; CAP = criteria air pollutant; CO = carbon monoxide; EMFAC = Emission Factors model; lb = pounds; NO _x = nitrogen oxides; PM _{2.5} = particulate matter less than 2.5 microns in diameter; PM ₁₀ = particulate matter less than 10 microns in diameter; ROG = reactive organic gases; SCAQMD = South Coast Air Quality Management District; SO _x = oxides of sulfur; VOC = volatile organic compounds						
Source: Ramboll US Corporation. (2023). See Appendix 4.1-1 .						

Mitigation Measures

No mitigation is required.



Impact 4.1-3:

Would the Project expose sensitive receptors to substantial pollutant concentrations?

Level of Significance: Less than Significant Impact

Sensitive land uses are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The nearest sensitive receptors to the Project site are residential uses located north of West 169th Street, south of West 170th Street, east of South Normandie Avenue, and west of Brighton Way.

Construction

Localized Significance Thresholds (LSTs) are used to evaluate the Project's construction-related emissions relative to the SCAQMD ambient air quality standard significance thresholds. The onsite construction and operational emissions for NO_x, CO, PM₁₀, and PM_{2.5} are compared to their respective thresholds provided in Appendix C of SCAQMD's LST Methodology. The Source Receptor Area (SRA) applicable to the Project is SRA Number 3, Southwest Coastal Los Angeles County, based on the Project's location. As a conservative approach, the thresholds chosen are for a 5.0-acre Project area since there is no published threshold specifically for the 5.25-acre Project site. Per guidance in SCAQMD's LST Methodology, the receptor distance was chosen based on the lowest (i.e., 25 meters), and thus most conservative, threshold for each pollutant for the "5.0-acre" LST. While the exact construction schedule and equipment mix may vary from the current analysis, the maximum daily emissions are not expected to be higher than that estimated given the conservative assumptions included in this analysis. As shown in **Table 4.1-7: Localized Significance of Construction Emissions**, the Project's maximum daily on-site construction-related emissions would be less than the SCAQMD mass-rate LSTs for NO_x, CO, PM₁₀, and PM_{2.5}. The construction emissions are based on conservative assumptions to represent the maximum level of construction activity that could occur on the Project site on any given day. Since the screening analysis shows that Project construction emissions would be below the mass-rate LSTs, the Project's contribution to the localized air concentrations of these pollutants would be less than significant.



Table 4.1-7: Localized Significance Of Construction Emissions (Maximum Pounds Per Day)

Emission Type	Maximum Daily On-Site Construction Emissions (lb/day) ¹				
	CO	NO _x	1-Hour NO _x ²	PM ₁₀ ³	PM _{2.5} ³
Onsite Construction Emissions ⁴	23.3	2.6	2.6	8.5	4.6
SCAQMD Localized Significance Thresholds ⁵	1,796	197	109	15	8
<i>Exceeds Threshold?</i>	No	No	No	No	No
<p>Notes:</p> <ol style="list-style-type: none"> Emissions represent the change in on-site emissions due to the proposed land uses relative to emissions from the existing conditions. An approximated LST was estimated to evaluate the federal 1-hour NO₂ standard, as the SCAQMD LST has not been updated to reflect this standard. This value was estimated by scaling the SCAQMD LST that represents the state 1-hr NO₂ standard with the ratio of the federal to state 1-hr NO₂ standard (0.10 ppm/0.18 ppm). PM fugitive dust emissions during unmitigated construction include a 55% reduction (for watering at least two times daily to comply with South Coast AQMD Rule 403). Construction and Project Total emissions presented are on-site emissions. LSTs based on a 5-acre project site SRA 3 (Southwest Coastal LA County) for a 25-m receptor distance. LSTs were obtained from the 2008 SCAQMD Final Localized Significance Threshold Methodology, Appendix C, Mass Rate LST Look-up Tables. Available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/localized-significance-thresholds. Accessed: November 2022. CalEEMod® - California Emissions Estimator Model; CO - carbon monoxide; lb - pounds; LST - Localized Significance Threshold; NO₂ - nitrogen dioxide; NO_x - nitrogen oxides; PM₁₀ - coarse particulate matter; PM_{2.5} - fine particulate matter; South Coast AQMD - South Coast Air Quality Management District 					
Source: Ramboll US Corporation. (2023). See Appendix 4.1-1 .					

Diesel Particulate Matter

Project construction activities would generate Diesel Particulate Matter (DPM) emissions from the use of required off-road diesel equipment. The amount to which the nearest sensitive receptors would be exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to 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.

A Health Risk Assessment (HRA) was conducted using the American Meteorological Society (AMS)/EPA Regulatory Model (AERMOD), see **Appendix 4.1-2**. AERMOD is the U.S. Environmental Protection Agency’s guideline model for the assessment of near-field pollutant dispersion. The SCAQMD provides guidance on the evaluation of localized air quality impacts to public agencies conducting environmental review of projects located within its jurisdiction with the Localized Significance Threshold Methodology. Refined air dispersion models require meteorological information to account for local atmospheric conditions. Due to their sensitivity to individual meteorological parameters such as wind speed and direction, the U.S. EPA recommends that meteorological data used as input into dispersion models be selected based on relative spatial and temporal conditions that exist in the area of concern. In response to this recommendation, meteorological data from the SCAQMD Hawthorne Airport monitoring station, located approximately 3.62 miles northwest of the Project site, was used to represent local weather conditions and prevailing winds.



The Project's construction-related activities would generate DPM emissions from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); building construction; paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM is the primary TAC of concern. On-road diesel-powered haul trucks traveling to and from the construction site to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. Diesel exhaust from construction equipment operating at the construction site poses a health risk to nearby sensitive receptors.

To assess localized impacts, construction phase, calendar year, and number of days associated with on-site construction activity were identified to produce an average daily DPM emission rate. Construction activities are estimated to occur for 994 days over a 1,160-day construction period based upon a 6-day per week construction schedule, which accounts for concurrent phase activities during paving and architectural coating operations. See **Appendix 4.1-2** for a summary of estimated average daily particulate emissions associated with various construction activities.

Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, would have some associated risk. As a result, the SCAQMD has established a maximum incremental cancer risk which meets or exceeds a threshold of 10 in one million (10E-06) for projects prepared under CEQA. This threshold is also consistent with the State of California as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65).

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper-bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ($\mu\text{g}/\text{m}^3$) over a 70-year lifetime.

Error! Reference source not found. presents the carcinogenic risk estimate for the maximum exposed residential receptor. The HRA determined that the off-site construction health risk would result in a maximum cancer risk of 6.6 in ten million, which would not meet or exceed the South Coast AQMD threshold of 10 in one million. Therefore, based upon the predicted carcinogenic risk and noncarcinogenic hazard estimates for the residential exposure scenario, the HRA demonstrates that Project construction activities would not result in unacceptable localized impacts from DPM exposure.



Table 4.1-8: Maximum Residential Receptor and Carcinogenic Risk

Age Group	Exposure Scenario
Third Trimester	2.8E-08
0 to 2 years	4.9E-07
2 to 9 years	1.5E-07
Total	6.6E-07

Source: **Appendix 4.1-2.**

An evaluation of the potential noncancer effects of DPM exposure were also evaluated in the HRA. Under the point estimate approach, adverse health effects are evaluated by comparing the pollutant concentration with the appropriate Reference Exposure Level (REL). There are no available acute/8-hour reference exposure levels for DPM. To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). To calculate the hazard index, the pollutant concentration or dose is divided by its toxicity value. Should the total equal or exceed one (i.e., unity), a health hazard is presumed to exist. No exposure frequency or duration adjustments are considered for noncarcinogenic exposures. The HRA determined that for chronic noncarcinogenic effects, the Project’s hazard index for the respiratory endpoint totalled approximately 0.0041 for the maximum exposed residential receptor, which would not meet or exceed the South Coast AQMD hazard index threshold of one. Therefore, impacts would be less than significant. Refer to **Appendix 4.1-2** for analysis methodology, results, and model data.

Operations

Localized Carbon Monoxide Impacts

A Carbon Monoxide (CO) hot spot is an area of localized carbon monoxide pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. The purpose of the analysis is to verify that the Project would not cause or contribute to a violation of the CO standard at intersections for which a significant impact would occur. It is noted that the Air Basin is designated as an attainment area for state and federal CO standards; and that there has been a decline in CO emissions even though vehicle miles traveled on urban and rural roads have increased. The SCAQMD studied the Air Basin’s four most congested intersections in 2003 in order to support their CO “attainment” demonstration to the U.S. EPA. The modeled intersections experienced more than 100,000 average daily trips, and SCAQMD found that even these highly congested intersections would not cause a CO hot spot to result. Therefore, given the Project’s estimated 1,713 average daily trips, it can be reasonably inferred that CO hot spots would not be experienced at any intersections. Therefore, impacts would be less than significant, and no mitigation is required.



Diesel Particulate Matter

Pursuant to California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, Case No. S213478, agencies are not required to analyze the CEQA impact of existing environmental conditions on a project's future users or residents, unless the proposed project risks exacerbating those environmental hazards or conditions that already exist. Therefore, operational-related DPM is not included as a part of this analysis.

Conclusion

Since the above analysis shows that the Project's construction and operations emissions would not exceed any significance thresholds for pollutants and therefore would not expose sensitive receptors to substantial pollutant concentrations, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation required.

Impact 4.1-4:

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

Level of Significance: Less than Significant Impact

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. South Coast AQMD Rule 1113 limits the allowable amount of VOCs from architectural coatings and solvents. Since compliance with South Coast AQMD Rules governing these compounds is mandatory, no construction activities or materials are proposed that would create objectionable odors adversely affecting a substantial number of people. Therefore, no significant impact would occur, and no mitigation is required.

The *South Coast AQMD 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 would not include any of the land uses that have been identified by the South Coast AQMD as odor sources. Waste collection areas and disposal for the Project would be covered and situated away from the property line and sensitive offsite uses. Therefore, potential odor impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.



4.1.6 CUMULATIVE IMPACTS

For purposes of the air quality impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic context for cumulative analysis of air quality is the SCAB; see also **Table 3-2: Geographic Context for Cumulative Analysis**.

Cumulative Construction Emissions

As previously concluded above, the Project would not conflict with the applicable air quality plans (Threshold 4.1.1). Similarly, all related projects would be required to demonstrate no conflict would occur with the applicable air quality plans. Therefore, the Project would not result in a cumulatively considerable impact concerning a conflict with the applicable air quality plan.

The Air Basin is designated nonattainment for O₃, PM₁₀, and PM_{2.5} for state standards and nonattainment for O₃ and PM_{2.5} for federal standards. Appendix D of the *SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects that result in emissions that do not exceed the project-specific South Coast AQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the South Coast AQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the Air Basin. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. Because project construction- and operations-related emissions would not exceed the South Coast AQMD significance thresholds for criteria pollutants, Project construction and operations would result in a less-than-significant impact. Therefore, Project construction and operations would not result in a significant cumulative impact.

As concluded above, the Project would not 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, nor would it expose sensitive receptors to substantial pollutant concentrations. The South Coast AQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumes fugitive dust controls would be used during construction, including frequent water applications. Compliance with South Coast AQMD rules and regulations would further reduce the Project construction-related impacts. Cumulative projects would also be subject to project-level review and project-specific measures would be required, as needed, to reduce significant impacts. Cumulative projects would also be required to comply with South Coast AQMD rules and regulations. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality significantly given compliance with the established regulatory framework would be required. Consequently, the Project combined with other cumulative development would not 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.

Project construction activities would generate temporary DPM emissions from the use of off-road diesel equipment. Considering the relatively short duration of DPM-emitting construction activity at any one location, and the highly dispersive properties of DPM, the Project would not expose sensitive receptors to substantial concentrations of construction-related TAC emissions. Similarly, cumulative project construction activities would generate temporary DPM emissions from the use of off-road diesel equipment. Given that the amount to which sensitive receptors near cumulative project construction sites would be exposed would be a function of proximity, concentration, and duration of exposure. As such, cumulative project's potential to result in the exposure of DPM would be determined on a site-by-site basis. Therefore, Project implementation would not result in a cumulative impact concerning DPM. As concluded above, the Project would not generate odors. Therefore, no cumulative impact concerning odors would occur.

4.1.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning air quality have been identified.

4.1.8 REFERENCES

Air Quality Dynamics. (2023). *16911 South Normandie – Construction Health Risk Assessment*; **Appendix 4.1-2: Health Risk Assessment.**

Ramboll US Corporation. (2023). *Air Quality Technical Report*; **Appendix 4.1-1: Air Quality Technical Report.**

Ramboll US Corporation. (2023). *Air Quality Technical Report - Air Quality Table Set.*

South Coast Air Quality Management District. (2022). *Air Quality Management Plan, 2022; California Air Resources Board, Ambient Air Quality Standards and Key Health and Welfare Effects.*

South Coast Air Quality Management District. (2016). *Air Quality Management Plan.* Pages 1-4.

United States Environmental Protection Agency (U.S. EPA). *Criteria Air Pollutants.*
<https://www.epa.gov/criteria-air-pollutants>. Accessed May 15, 2023.

An architectural rendering of a modern multi-story residential building. The building features a mix of light-colored facades and dark window frames. A central courtyard contains a rectangular swimming pool with a wooden deck, surrounded by lounge chairs and small trees. The building has multiple balconies with glass railings. In the foreground, there are several rooftop terraces with wooden decking and some greenery. The overall style is clean and contemporary.

4.2 *CULTURAL RESOURCES*



4.2 CULTURAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to cultural resources, and to evaluate the Project's potential to cause a substantial adverse change in the significance of a historical or archaeological resource, or to disturb any human remains. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impacts.

Information in this section is based primarily on the following sources:

- *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California (Archeological Assessment); see **Appendix 4.2-1: Archaeological Resources Assessment**.
- *Historical Resources Assessment Report*, 16911 South Normandie Avenue, Gardena, Los Angeles County, California (Historical Resources Assessment); see **Appendix 4.2-2: Historical Resources Assessment**).

BCR Consulting LLC (BCR) conducted a third-party review on behalf of the City of Gardena ("City") of the Archaeological Assessment and Historical Resources Assessment; see **Appendix 4.2-1** and **Appendix 4.2-2**, respectively. The third-party review concluded the reports meet the applicable provisions of California Environmental Quality Act (CEQA) and the state CEQA Guidelines. The Tribal Resources Assessment is addressed as a part of **Section 4.14: Tribal Cultural Resources** of this EIR.

4.2.1 CULTURAL RESOURCES TERMINOLOGY AND CONCEPTS

Key terms and concepts used in this section to describe and assess the potential cultural resource impacts are defined below:

Archeological Site. An archeological site is defined by the National Register of Historic Places (NRHP) as the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains. Archeological remains usually take the form of artifacts (e.g., fragments of tools, vestiges of utilitarian or non-utilitarian objects), features (e.g., remnants of walls, cooking hearths, or midden deposits), and ecological evidence (e.g., pollen remaining from plants that were in the area when the activities occurred). Prehistoric archaeological sites generally represent the material remains of Native American groups and their activities dating to the period before European contact. In some cases, prehistoric sites may contain evidence of trade contact with Europeans. Ethnohistoric archaeological sites are defined as Native American settlements occupied after the arrival of European settlers in California. Historic archaeological sites reflect the activities of non-native populations during the Historic period.



Artifact. An object that has been made, modified, or used by a human being.

Cultural Resource. A cultural resource is a location of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. Cultural resources include archaeological resources and built environment resources (sometimes known as historic architectural resources), and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events. They may consist of physical remains or areas where significant human events occurred, even though evidence of the events no longer remains. Cultural resources also include places that are of traditional, cultural, or religious importance to social or cultural groups.

Cultural Resources Study Area (“study area”). All areas of potential permanent and temporary impacts for a reasonable worst-case development within a project site and off-site impact areas, including a 15-foot buffer around construction areas.

Ethnographic. Relating to the study of human cultures. “Ethnographic resources” represent the heritage resource of an ethnic or cultural group, such as Native Americans or African, European, Latino, or Asian immigrants. They include traditional resource-collecting areas, ceremonial sites, value-imbued landscape features, cemeteries, shrines, or ethnic neighborhoods.

Historic Period. The period that begins with the arrival of the first non-native population and thus varies by area.

Historical Resource. This term is used for the purposes of California Environmental Quality Act (CEQA) and is defined in the State CEQA Guidelines (14 California Code of Regulations [CCR] §15064.5) as: (1) a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources (CRHR); (2) a resource included in a local register of historical resources, as defined in Public Resources Code (PRC) §5020.1(k) or identified as significant in a historical resource survey meeting the requirements which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Historical resources may also include tribal cultural resources including sites, features, places, cultural landscapes, sacred places, objects, and/or archeological resources with value to a California Native American Tribe per PRC §21074.

Prehistoric Period. The period prior to 1772. The later part of the prehistoric period (post-1542) is also referring to as the protohistoric period in some areas, which marks a transitional period during which native populations began to be influenced by European presence resulting in gradual changes to their lifeways.

Tribal Cultural Resource. This term refers to a site, feature, place, cultural landscape, sacred place, object, or archaeological resource with cultural value to a California Native American tribe



that is listed or eligible for listing in national, California, or local registers. A lead agency also has the discretion to determine that a resource is a tribal cultural resource if the determination is supported by substantial evidence. Tribal cultural resources are addressed in **Section 4.14: Tribal Cultural Resources**.

Unique Archeological Resource. This term is used for the purposes of CEQA and is defined in PRC §21083.2(g) as an archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it either contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; has a special and particular quality such as being the oldest of its type or the best available examples of its type; or, is directly associated with a scientifically recognized important prehistoric or historic event or person.

4.2.2 EXISTING SETTING

Ethnographic, Archaeological, and Historic Contents

See **Section 4.14: Tribal Cultural Resources** for the Ethnographic Setting.

Prehistoric Setting

The prehistoric chronology for the southern California coastal region that is applicable to near-coastal and many inland areas is identified by the following prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. These horizons are described in detail in **Appendix 4.2-1**.

Historic Setting

Between 1769 and 1822, the Spanish colonized California and established missions, presidios, and pueblos. After winning its independence from Spain, Mexico worked to lessen the wealth and power held by these missions. In 1833, in accordance with the Spanish-Mexican Grant Act of 1851, the missions and their lands were given to the Mexican governor, who redistributed them in the form of grants to private owners, who set up ranchos.

On April 4, 1850, five months prior to California's achieving statehood, Los Angeles became an American city. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California's statehood. When California was granted statehood in 1850, the United States promised to honor rancho land grants. However, the process of defining land boundaries and proving legal ownership was often costly and time consuming. In combination with environmental factors detrimental to the cattle industry, many ranchos incurred debt and went into bankruptcy. This resulted in ranchos being divided up and sold inexpensively into agricultural parcels or towns.



City of Gardena

The City was part of the 43,000-acre Spanish land grant known as Rancho San Pedro. Gardena's path to incorporation began during the 1880's real estate boom.

The City was incorporated on September 11, 1930, nearly 50 years after the first settlers moved to the area, consolidating the surrounding communities of Gardena, Strawberry Park, and Moneta. At that time, the City was a farming community of approximately 20,000 people.

In 1890, the railroad extended along Western Avenue. Another key development in the 1890s was the selection of San Pedro as the official port for the City of Los Angeles. The impact of this designation reverberated through the South Bay Region in the late 19th century and early 20th century. The siting of the port in San Pedro influenced development and settlement patterns through the south bay, since connecting cities and communities became important transit stops and centers as well as locations for industrial and manufacturing plants which attracted new residents.

Since its earliest years, Gardena has owed its growth and development to its proximity to evolving transportation corridors and lines. Before the advent of the automobile, transportation options included the Los Angeles and Redondo Railroad line, the 1903 California Pacific Railway line connecting San Pedro and Los Angeles via Gardena, and the Pacific Electric Railway Line (or the "Red Cars") which were established through Gardena in 1912.

Through the first quarter of the 20th century, Gardena remained largely agricultural in nature. The town became known as "Berryland," Southern California's berry-growing capital. There was a rapid influx of new settlers and new construction in the 1920s, which started Gardena's shift from agriculture to new development, including new residential, commercial, and institutional expansion.

Historical Development of the Project Site

Until the 1950s, most of the Project site remained largely undeveloped. The establishment of the Southern Pacific Railroad in Gardena in the 1890s and the arrival of the Red Car system along Normandie Avenue in 1912 spurred residential, commercial, and manufacturing expansion in the City as well as near the Project site. Areas around the Project site were subdivided and developed into blocks with residential buildings. The Project site itself was primarily devoted to manufacturing/industrial uses, with some residential development in the pre-World War II era. The post-World War II boom in construction and settlement brought the most significant, rapid changes to the Project site.

Existing Historic Resources

As depicted in **Exhibit 2-2: Local Vicinity Map**, situated on the property are six industrial buildings totaling approximately 115,424-SF. Because the Project site has buildings over 45 years old, a



Historical Resources Assessment (**Appendix 4.2-2**) was conducted for the existing structures. **Table 4.2-1: Onsite Land Use Characteristics** details the existing onsite land uses by APN and address, as well of dates of initial construction and of any significant modifications as described in **Appendix 4.2-2**. The Historical Resources Assessment evaluated the six structures identified below, see **Appendix 4.2-2** for images of the existing onsite structures. The buildings were characterized as being in poor, fair, good, or excellent conditions.

In summary, Building 4, constructed in 1952 as a canning plant/food manufacturer, is the earliest extant property in the Project site. This canning plant grew quickly and expanded in 1953 with the construction of Building 5. The parcel to the north was developed in 1957, with the construction of Building 3, for use as a general contracting company. The next additions in the Project site were Buildings 2 and 6, in the north and south portions of the Project site in 1963 and 1967, respectively. Building 1, the warehouse at the north of the Project site, was added in 1976. Additional changes and additions over the years have taken place, as well, with new construction as well as removal of ancillary buildings and structures.

Table 4.2-1: Onsite Land Use Characteristics

Parcel ID ¹	APN ²	Building Number ²	Address ²	Year Built ²	Square Feet	Latest Significant Modification ²
1	6106-030-011	1	16829 South Normandie Avenue	1976	10,000	Interior remodel and window replacement in 2016, and re-roofing in 2018.
		2	16829 South Normandie Avenue	1963	880	Possible re-roofing in 2018.
2	6106-030-015	3	16835 South Normandie Avenue	1956/ 1957	9,600	Re-roofing in 1991 and interior remodels in 1977, 1983, and 2015.
3	6106-030-016	None	Parking lot	–	–	–
4	6106-030-017	4	16907 South Normandie Avenue	1952	94,944 ³	Minimal alterations in the 1950s. Demolition and expansion in the 1960s. Major structural repairs in 2019.
		5	16911 South Normandie Avenue	1953		Remodeled in multiple times between 1952 and 1967. In 1987, a new 20,825-SF building was constructed.
		6	16911 South Normandie Avenue	1967		Additional interior alterations in the 1980s.

Notes:

1. The Parcel ID (Identification Number) correlates with labels on **Exhibit 2-2: Local Vicinity Map**.
2. See **Appendix 4.2-2** for further information.
3. This total includes 9,324 square feet of building that is unoccupied and dilapidated.



Building 1, located at the northern edge of the Project site, is a large-scale warehouse with limited ornamentation and wall openings constructed in 1976. High, vehicle-sized roll-up doors on the south and west elevations, along with the utilitarian, program-driven design of the building, reflect its industrial and manufacturing use. The building is capped with a flat roof with no roof eaves. Built on a concrete foundation, the building is made of concrete-block construction. Encircling the building is a series of simple, full-height pilasters. The principal elevation, which is located on the south, has nine pilasters; the shorter side elevations, on the east and west, have two pilasters. The building is in fair condition with few visible alterations.

Building 2, located at the northeast corner of the Project site, is a one-story building set on a concrete foundation and has a rectangular footprint. Constructed in 1963, the building has a flat roof with varying eaves depending on the elevation. The north elevation does not have roof eaves; the east elevation has moderately overhanging, closed eaves; and the south elevation has broadly overhanging eaves with exposed rafter tails. A narrow roof extension on the west side of the building connects Building 2 to Building 1 to create a short, covered walkway. Located on the south elevation, the primary entrance appears to be a solid wood or metal door. A similar door is located on the west elevation facing Building 1. A decorative stone-clad wall is located at the northeast corner of the building, and a short, concrete walkway extends from the east elevation to the sidewalk. It appears that a door opening was enclosed at this location. Fenestration consists of vinyl-sash picture and sliding windows. The building is in fair condition.

Building 3, located at the northeastern end of the Project site along South Normandie Avenue, is a one-story, masonry building set on a concrete foundation. Constructed in 1955/1957, it has a rectangular footprint that is divided for three storefronts. The perimeter of the building is edged with a small parapet. The east façade is clad with brick with three identical storefronts, each separated by a concrete block pilaster. Each storefront includes a centered door flanked by recessed, vinyl-frame storefront windows covered with security grilles. Black awnings are mounted on the façade to shelter the doors and windows. The north and south elevations appear to be painted concrete block; these elevations do not have fenestration. Painted signage reading “Miracle Water” is painted on the south elevation. The west elevation has three bays with garage doors and inset pedestrian doors. A shallow, paved parking lot on the east side of the building exits to Normandie Avenue. The building is in good condition with few visible alterations.

Building 4, located at the center of the Project site, is the oldest building on the Project site. In its entirety, Building 4 extends from Normandie Avenue to Brighton Way. The original L-shaped portion of the building was constructed in 1952 building (roughly the western half) and a large addition comprising the eastern half. A small addition was also built perpendicular to the building at its southwest corner. Both the original portion of the building and the addition have varied roof heights. Set on a concrete foundation, the building has a flat roof, areas of which have a parapet wall. The building’s exterior appears to be concrete or stucco. Facing Brighton Way, the building’s west elevation has a louvered window covered by a security grille, and a similarly sized window opening that has been enclosed. The north elevation has mechanical equipment and



conduits mounted on the walls; no fenestration was observed on this elevation. The small addition projecting from the southwest corner of the building is slightly taller with no fenestration on its west elevation. The south elevation has one door and what appears to be a window opening that has been enclosed. The east elevation is a large addition with a solid metal door accessed via a set of concrete steps lined with a metal pole railing. The south elevation appears to have a secondary entrance and several loading docks. The southeast corner of the addition has a lower roof height and large, two-light windows with fabric awnings, and a single door. Although a portion of this building is in dilapidated condition and not occupiable or currently being used, the overall building is in fair condition with various additions and alterations.

Building 5, is also located at the center of the Project site. Constructed in 1953, the building is on a concrete foundation and has a generally rectangular footprint. It is composed of a large domed volume, and one-story sections along the south side of the building, which have flat and shed roofs. The exterior walls include portions constructed with concrete block, and portions sheathed with stucco and corrugated metal panels. The east façade includes a large expanse of wall with no fenestration, and an area at the southeast corner that is framed to define the primary entrance, which consists of commercial metal-frame double doors with full-length glazing. Adjacent to the entrance is a large area of glass block. There appears to be a second window near the north end of the façade. The west elevation does not have fenestration but has small signs mounted on the upper wall. The south elevation is the one-story, flat- and shed-roofed portions of the building and includes mechanical equipment and metal pole railings. The north elevation does not appear to contain windows but has a pedestrian entrance and a larger garage door sheltered by a roof. The building is in fair condition.

Building 6, located at the southern edge of the Project site, is a large warehouse with an irregular footprint – its eastern elevation is slanted to parallel Normandie Avenue. The building has a flat roof, and its exterior appears to be concrete or stucco. A one-story element is located at the northeast corner of the building. It has a flat roof supported by rods attached to the main warehouse and is clad with corrugated metal siding. The east elevation has three evenly spaced corrugated metal roll-up doors. The north elevation appears to include several loading bays with large roll-up doors, at least one of which is sheltered by a flat roof canopy. The south and west elevations do not have any fenestration. The building is in good condition with few visible alterations.

Existing Archaeological Resources

Previously Recorded Resources

For the Project Archaeological Assessment, a California Historical Resources Information System (CHRIS) records search (within a 0.5-mile radius of the Project site) was conducted at the South-Central Coastal Information Center at California State University, Fullerton. The CHRIS records search indicated that 13 cultural resource studies have been conducted within a 0.5-mile radius



of the Project site. The record search results for reports within 0.5 mile of the Project site are summarized in **Appendix 4.2-2**. The CHRIS records search identified seven previously recorded resources within a 0.5-mile radius of the Project site. None of the resources were located at the site. Five resources identified within the 0.5-mile radius are historic resources and two are prehistoric sites.

Prehistoric artifacts and sites are more likely to be found near sources of water. Water features including perennial springs and small wetlands are known to have existed just southeast of the Project site. The site records indicate that both prehistoric resources were located near or adjacent to the Dominguez Slough. The slough is approximately 0.2 mile to the southeast of the Project site. A portion of the Dominguez Channel, located approximately 1.5 miles to the west-northwest of the Project site, fed into the Laguna Dominguez river going southeast to the slough. As the previously documented sites indicate, areas such as this would have been frequented by Native Americans.

Archival Research

Concurrent with the CHRIS records search, research on property-specific historical and ethnographic context was conducted to identify information relevant to the Project site. Research focused on a variety of primary and secondary materials relating to the history and development of the Project site, including historical maps, aerial and ground photographs, ethnographic reports, and other environmental data. Review of Sanborn Fire Insurance maps, newspaper articles, and building permits failed to produce conclusive results for the site. This is likely because the area was undeveloped and may have been used primarily as an agricultural field until as late as the mid-20th century, when warehouses were constructed, see the *Historical Development of the Project site* discussion above for further analysis on construction of the Project site.

4.2.3 REGULATORY SETTING

Federal

National Historic Preservation Act of 1966

Enacted in 1966 and amended in 2000, the National Historic Preservation Act (NHPA) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the Federal, State, and local levels. The NHPA authorized the expansion and maintenance of the NRHP, established the position of State Historic Preservation Officer and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage and created the Advisory Council on Historic Preservation. Additionally, the policies of the NHPA are implemented by the California Office of Historic Preservation, a division of the California



Department of Parks and Recreation. The Office of Historic Preservation is also tasked with carrying out the duties described in the Public Resources Code and maintaining the California Historic Resources Inventory and California Register of Historical Resources (CRHR).

National Register of Historic Places

As codified in 36 Code of Federal Regulations [CFR] 60.2, the NRHP was established by the NHPA of 1966 as “an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”

The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: It is associated with the lives of persons who are significant in our past;
- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historic figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, and properties that are primarily commemorative in nature, are not considered eligible for the NRHP, unless they satisfy certain conditions. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

In addition to meeting these criteria, a property must retain historic integrity, which is defined in National Register Bulletin 15 as the “ability of a property to convey its significance.”¹ To retain integrity, a property must possess several, if not all, of these seven qualities, which are defined in the following manner in National Register Bulletin 15:

1. Location – the place where the historic property was constructed or the place where the historic event occurred;
2. Design – the combination of elements that create the form, plan, space, structure, and style of a property;



3. Setting – the physical environment of a historic property;
4. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. Workmanship – the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
6. Feeling – a property’s expression of the aesthetic or historic sense of a particular period of time;
7. Association – the direct link between an important historic event or person and a historic property.

State

California Environmental Quality Act

California public agencies must consider the effects of their actions on both “historical resources” and “unique archaeological resources.” Pursuant to PRC §21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” PRC §21083.2 additionally requires agencies to determine whether proposed projects would have effects on “unique archaeological resources.”

“Historical resource” is a term with a defined statutory meaning. Under state CEQA guidelines §15064.5 (a), “historical resource” includes the following:

1. a resource listed in or determined to be eligible by the state historical resources commission (SHRC), for listing in the CRHR (PRC §5024.1, Title 14 CCR, §4850 et seq.).
2. a resource included in a local register of historical resources, as defined in PRC §5020.1(k) or identified as significant in an historical resource survey meeting the PRC §5024.1(g) requirements, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC, §5024.1, Title 14 CCR, §4852) including the following:



- Criteria 1: If the resource is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- Criteria 2: If the resource is associated with the lives of persons important in our past.
- Criteria 3: If the resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Criteria 4: If the resource has yielded, or may be likely to yield, information important in prehistory or history.

CEQA addresses significant impacts to historical resources. “a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (State CEQA Guidelines §15064.5(b)(1)). CEQA also requires agencies to consider whether projects will affect “unique archaeological resources.” PRC §21083.2(g) states that “‘unique archaeological resources’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized, important prehistoric or historic event or person.”

Public Resources Code (PRC §5024.1[a])

The evaluation criteria for inclusion in the CRHR are cited in PRC §5024.1(a). This section states that a resource may be listed as a historical resource in the California registrar if it meets any of the following national register of historic places criteria:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.



2. The resource is associated with the lives of persons important in our past.
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work on an important creative individual, or possesses high artistic values.
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

Public Resources Code (PRC §5024.1[b])

This section states that any agency proposing a project that could potentially impact a resource listed on the CRHR must first notify the state historic preservation officer and must work with the officer to ensure that the project incorporates “prudent and feasible measures that will eliminate or mitigate the adverse effects.”

Public Resources Code (PRC §5097.98)

See **Section 4.14: Tribal Cultural Resources.**

Senate Bill 18

See **Section 4.14: Tribal Cultural Resources.**

Assembly Bill 52

See **Section 4.14: Tribal Cultural Resources.**

Local

City of Gardena General Plan

The Gardena 2006 General Plan (GGP) Community Resource Element provides a Conservation Plan with the following goals and policies for the treatment of historic and cultural resources:

- **CN Goal 5:** Protect the City’s cultural resources.
 - **Policy CN 5.3:** Protect and preserve cultural resources of the Gabrielino Native American Tribe found or uncovered during construction.

The GGP Community Development Element provides a Land Use Plan with the following goals and policies for the treatment of historic and cultural resources:

- **LU Goal 1:** Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high quality housing types in the City.
 - **Policy LU 1.7:** Preserve the City’s residential buildings of historic and cultural significance.



- **LU Goal 4:** Provide the highest quality of public facilities possible to meet the needs of the City’s residents and businesses and promote the City’s image and cultural heritage.
 - **Policy LU 4.5:** Encourage the preservation of historical and cultural locations and monuments to preserve the heritage of the City.

The City does not have a local historic preservation ordinance with adopted criteria for designation. Therefore, this analysis considers Federal and State significance criteria.

4.2.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning cultural resources. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to [State CEQA Guidelines] §15064.5 (see Impact 4.2-1);
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to [State CEQA Guidelines] §15064.5 (see Impact 4.2-2);
- Disturb any human remains, including those interred outside of formal cemeteries (see Impact 4.2-3).

4.2.5 IMPACTS AND MITIGATION MEASURES

Impact 4.2-1:

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

Level of Significance: No Impact

The Project site is developed with six commercial buildings. The conclusions of the historical assessment are provided below.

Buildings 1 and 2

Broad Patterns of History. Building 1 and 2 were previously occupied by a variety of companies over the years. The Bjerke-Nicholson Construction Company occupied the buildings from the 1950s until at least 1970. Based on available sources, research did not suggest or show that the Bjerke-Nicholson Construction Company has an association with significant patterns of development or events significant to the City, region, state, or nation.

From 1977 to 1990, the buildings were occupied by Owen Machine Company, which was established in 1972 by owner Frank W. Owen. In subsequent years, the building were occupied



by several companies, including the YMD Moving Company (as of 1990), Olympic Van Lines (as of 1990), Avenue Auto Body (as of 1995), and KS Custom Cabinets (as of 2001). Research did not suggest that any of these companies and businesses have an association with a significant pattern or development or event.

In addition, the buildings are among numerous industrial properties developed in the postwar period in Gardena, and do not uniquely reflect or embody a pattern of development significant to the City, region, state, or nation. In addition, research to date has not indicated any historically significant events have taken place at the buildings. Therefore, Buildings 1 and 2 do not appear eligible for listing in the NRHP under Criterion A or for the CRHR under Criterion 1, either individually or as a contributor to a historic district.

Significant Persons. Research has not revealed that Buildings 1 or 2 have an association with the lives of significant individuals in the history of the City, region, state, or nation, either in terms of design professionals, owners, or occupants associated with the buildings. Therefore, the buildings do not appear eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2, either individually or as a contributor to a historic district.

Architecture. The structures are highly utilitarian, purpose-built industrial/manufacturing and office buildings. They do not represent a distinctive or outstanding example of industrial or office building design, nor do they embody the distinctive characteristics of a type, style, design, period, or method of construction. Building 1 exhibits the highly common (but not distinctive) characteristics of a warehouse, in an area of Gardena with numerous examples of buildings designed for industrial/manufacturing uses. Based on research conducted for this EIR, the buildings do not appear to be the work of a notable architect, builder, or designer, nor do they possess high artistic values. Therefore, Buildings 1 and 2 do not appear eligible under NRHP Criterion C or CRHR Criterion 3, either individually or as a contributor to a historic district.

Important Prehistory and History. The structures on the subject property are constructed with common building materials and typical construction techniques that are widely understood and documented. The property itself has been thoroughly documented over time and it is not expected that additional significant information would be revealed. Therefore, Buildings 1 and 2 do not appear eligible under NRHP Criterion D or CRHR Criterion 4, either individually or as a contributor to a historic district.

Therefore, Buildings 1 and 2 are not eligible for listing as a historic resource.

Building 3

Broad Patterns of History. Building 3 was occupied by a variety of companies over the years. Following construction of the Building 3, the first listed occupant, in 1958, was Prescon Corporation. From the 1960s through the 1970s, other companies listed at the address include Fuji Cabinet Works (1964), Riviera Catering (1970), and Gardena Catering (1975 to 1976). The



Miracle Water Company of Southern California occupied the address from 1980 to 1995. Based on available sources, research did not suggest or show that any of the companies or businesses have an association with a significant pattern or development or event.

Building 3 is among numerous industrial properties developed in the postwar period in Gardena, and it does not uniquely reflect or embody a pattern of development significant to the City, region, state, or nation. Research does not indicate any historically significant events have taken place at the building. Building 3 does not appear eligible for listing in the NRHP under Criterion A or for the CRHR under Criterion 1, either individually or as a contributor to a historic district.

Significant Persons. Research conducted to date has not revealed Building 3 to have an association with the lives of significant individuals in the history of the city, region, state, or nation, either in terms of design professionals, owners, or occupants associated with the property. Therefore, Building 3 does not appear eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2, either individually or as a contributor to a historic district.

Architecture. Building 3 is a highly utilitarian, commercial/industrial building. It does not represent a distinctive or outstanding example of industrial or commercial design, nor does it embody the distinctive characteristics of a type, style, design, period, or method of construction. Based on research conducted for this EIR, the structure does not appear to be the work of a notable architect, builder, or designer, nor does it possess high artistic values. Therefore, Building 3 does not appear eligible under NRHP Criterion C or CRHR Criterion 3, either individually or as a contributor to a historic district.

Important Prehistory and History. The structures on the subject property are constructed with common building materials and typical construction techniques that are widely understood and documented. The property itself has been thoroughly documented over time and it is not expected that additional significant information would be revealed. Therefore, Building 3 does not appear eligible under NRHP Criterion D or CRHR Criterion 4, either individually or as a contributor to a historic district.

Therefore, Building 3 is not eligible for listing as a historic resource.

Buildings 4, 5, and 6

Broad Patterns of History. Buildings 4, 5, and 6 were previously occupied by a variety of companies over the years. Research does not suggest or show that any of the companies have an association with significant patterns of development or events significant to the city, region, state, or nation. In addition, Buildings 4, 5 and 6 are among numerous industrial properties developed in the postwar period in Gardena, and they do not uniquely reflect or embody a pattern of development significant to the city, region, state, or nation. In addition, research to date has not indicated any historically significant events have taken place at the subject



properties. Buildings 4, 5, and 6 do not appear eligible for listing in the NRHP under Criterion A or for the CRHR under Criterion 1, either individually or as a contributor to a historic district.

Significant Persons. Buildings 4, 5, and 6 do not have an association with the lives of significant individuals in the history of the city, region, state, or nation, either in terms of design professionals, owners, or occupants associated with the properties. Therefore, Buildings 4, 5, and 6 do not appear eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2, either individually or as a contributor to a historic district.

Architecture. Buildings 4, 5, and 6 are highly utilitarian, purpose-built industrial/manufacturing and office buildings. They do not represent a distinctive or outstanding example of industrial or office building design, nor do they embody the distinctive characteristics of a type, style, design, period, or method of construction. The structures do not appear to be the work of a notable architect, builder, or designer, nor do they possess high artistic values. Therefore, Buildings 4, 5, and 6 do not appear eligible under NRHP Criterion C or CRHR Criterion 3, either individually or as a contributor to a historic district.

Important Prehistory and History. The structures on the subject property are constructed with common building materials and typical construction techniques that are widely understood and documented. The property itself has been thoroughly documented over time and it is not expected that additional significant information would be revealed. Therefore, Buildings 4, 5, and 6 do not appear eligible under NRHP Criterion D or CRHR Criterion 4, either individually or as a contributor to a historic district.

Therefore, Buildings 4, 5, and 6 are not eligible for listing as a historic resource.

None of the buildings evaluated, which are at least 45 years old, are eligible at either the federal, state, or local level of historic designation, either individually or as a contributor to a historic district. Further, no portion of the Project site is listed in the Los Angeles Historic Resources Inventory, NRHP or the CRHR, nor appears to be eligible under any of the NRHP Criteria. The City does not have a historic designation program or historic preservation ordinance.

Therefore, none of the subject properties are historical resources for purposes of CEQA and the Project would not cause a substantial adverse change in the significance of a historical resource. No impact would occur and no mitigation is required.

Mitigation Measures

No mitigation is required.



Impact 4.2-2:

Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Level of Significance: Less Than Significant With Mitigation Incorporated

The CHRIS records search identified seven previously documented cultural resources within a 0.5-mile radius of the Project site. However, none of the seven resources are on the Project site and only two resources are prehistoric archaeological sites. While the CHRIS records search results did not identify any such archaeological resources within the Project site or its immediate vicinity, most of the site was not inspected for archaeological resources because of the developed nature of the site.

The depth of excavation for the Project is approximately 60 feet below the surface, which would likely require excavation of underlying alluvial sediments and removal of the overlying artificial fill. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling trucks, and a drill. The Project site is identified as having moderate sensitivity for prehistoric or historic Native American archaeological resources, see **Section 4.14 – Tribal Cultural Resources** for discussion of the Projects potential impacts to Native American tribal resources. Based on previous development of the Project site, the archaeological assessment determined the Project site has a moderate sensitivity for containing historic period (non–Native American) archaeological resources. Therefore, the Project has moderate potential to encounter archaeological resources during construction (i.e., ground disturbing activities).

A significant impact would occur if grading and construction activities would result in a substantial adverse change in the significance of an archaeological resource determined to be “historic” or “unique.” According to CEQA, if an archaeological resource is neither historic nor unique, the effects of a project on that resource would not be considered to have significant effects on the environment (State CEQA Guidelines §15064(C)(4)).

Conservatively, it is assumed that any as-yet unidentified archaeological resources at the Project site would be impacted through grading and construction activities. However, the Project site consists of a comparatively small area within the greater region and has been subject to multiple episodes of ground disturbance. As a result, any archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved within the Project site, though more deeply buried deposits could exist. The significance of any impacts would be based upon the criteria presented in the thresholds of significance (i.e., is the archaeological resource determined to be “historic” or “unique”).

Although such a discovery is unlikely, any previously unidentified archaeological resources, if present, have the potential to be significant under CEQA. Mitigation Measures (MM) CUL-1 and



MMs TCR-1 through TCR-3 (see **Section 4.14: Tribal Cultural Resources**) are recommended to avoid or mitigate potential impacts to as yet undiscovered archaeological resources. Following compliance with MM CUL-1 and MMs TCR-1 through TCR-3, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts would be less than significant with mitigation incorporated. For further evaluation of tribal cultural resources, see **Section 4.14**.

Mitigation Measures

MM CUL-1 Inadvertent discovery of an archaeological resource. Before ground disturbing activities are initiated on the Project site, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site’s history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction.

If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.

See **Section 4.14** for the following measures:

- **MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.**
- **MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.**
- **MM TCR-3: Procedures for burials and funerary remains: This mitigation measure shall only apply if the Gabrieleno Band of Mission Indians-Kizh Nation is designated the Most Likely Descendent (“MLD”) by the NAHC.**

Impact 4.2-3:

Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Level of Significance: Less Than Significant Impact With Mitigation Incorporated

The archaeological records search and field survey did not reveal any resources known to contain human remains within or near the Project site. No dedicated cemeteries are on or near the Project site. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling



trucks, and a drill. The maximum anticipated depth of excavation below the existing surface grade is estimated at 60 feet.

If human remains are found, those remains would require proper treatment in accordance with applicable laws, including Health and Safety Code (HSC) §§7050.5-7055 and PRC §5097.98 and §5097.99. HSC §§7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC §7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC §7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by state law, the procedures set forth in PRC §5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would then designate the Most Likely Descendant (MLD) of the unearthed human remains. Following compliance with the established regulatory framework (i.e., HSC §§7050.5-7055 and PRC §§5097.98 and 5097.99), the Project's impacts concerning potential to disturb human remains, would be a less than significant. Compliance with MM TCR-2 would further minimize potential to impact human remains.

Mitigation Measures

See **Section 4.14: Tribal Cultural Resources**, for **MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects**.

4.2.6 CUMULATIVE IMPACTS

For purposes of the cultural resources impact analysis, cumulative impacts for Historic Resources are considered for cumulative development within a 500-foot radius of the Project site and within a 0.5-mile radius for Archaeological Resources, according to the related projects; see **Table 3-2: Geographic Context for Cumulative Analysis**. As indicated in **Table 3-1: List of Cumulative Projects** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are seven related projects within the geographic context for the cultural resources analysis: Related Project No. 2¹ (a multi-family condominium development approximately 0.14 mile to the northeast); Related Project No. 3² (a small lot subdivision with three-story dwelling units approximately 0.08 mile to the northeast); Related Project No. 9 (a townhome development approximately 0.88 mile to the northeast); Related Project No. 12 (a self-storage/warehouse development approximately 0.30 mile to the south); Related Project No. 15 (a townhome development approximately 0.50 mile to the south); Related Project No. 16 (a mixed use development, including apartments and commercial retail and office space, approximately 0.30 mile to the north); Related Project No. 22 (a multi-family townhome development with 3 affordable dwelling units approximately 0.70 mile

¹ This related project is approximately 720 feet northeast of Project site. This is second nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review anticipated expiration November 2023. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023)

² This related project is approximately 400 feet northeast of Project site. Nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review has expired. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023).



to the north); and Related Project No. 23 (a multi-family apartment development approximately 0.60 mile to the north).

There is a potential for undiscovered archaeological resources to be adversely impacted during Project construction. With implementation of MM CUL-1 and MM TCR-1 through MM TCR-3 the Project would not cause a substantial adverse change in the significance of archaeological resources. Cumulative projects could involve actions that damage known or as-yet undiscovered archaeological and tribal cultural resources specific to those development sites. However, as with the Project, all cumulative development would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to cultural resources. This would include studies of historical, archaeological, and tribal cultural resources that are present or could be present within a development site. Additionally, cumulative development would be subject to compliance with the established federal, state, and local regulatory framework concerning the protection of cultural resources on a project-by-project basis. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts to archaeological and tribal cultural resources would be less than significant given compliance with the established regulatory framework and site-specific mitigation would be required.

As concluded above, previously undiscovered human remains could be encountered during Project construction activities; however, a less than significant impact would occur in this regard following compliance with the established state regulatory framework. Cumulative development could impact previously undiscovered human remains during construction. However, all cumulative development would undergo environmental review on a project-by-project basis to evaluate the site-specific archaeological sensitivity. Additionally, cumulative development would be subject to compliance with the established state regulatory framework concerning the discovery of human remains on a project-by-project basis. The Project's cumulative impacts concerning the potential to disturb human remains would be less than significant given compliance with the established regulatory framework would be required.

4.2.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to cultural resources have been identified.

4.2.8 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006: Community Resources Element, Conservation Plan*. Retrieved from <https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan7.pdf>.

City of Gardena. (2006). *Gardena General Plan 2006: Community Development Element, Land Use Plan*. Retrieved from [2021-Updated-Land-Use-Plan-04-21.pdf \(cityofgardena.org\)](#).



- SWCA. (2022). *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California; see **Appendix 4.2-1: Archaeological Resources Assessment**.
- SWCA. (2023). *Historical Resources Assessment Report* for the 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California; see **Appendix 4.2-2: Historical Resources Assessment**.

4.3 ENERGY





4.3 ENERGY

The purpose of this section is to describe the existing regulatory and environmental conditions related to energy and evaluate the Project’s potential to result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and/or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project’s potentially significant impact.

Information in this section is based primarily on energy data provided in the following sources:

- Normandie Crossing Specific Plan Project – Energy Assessment (“Energy Assessment”) (Kimley-Horn and Associates, 2023); **Appendix 4.3-1: Energy Data.**
- Air Quality Technical Report – Normandie Apartments Project Gardena, California (“Air Quality Technical Report”) (Ramboll US Consulting, Inc, 2023); **Appendix 4.1-1: Air Quality Technical Report.**

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s Air Quality Technical Report; see **Appendix 4.1-1**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and the state CEQA Guidelines.

4.3.1 EXISTING SETTING

The Project site is in the County of Los Angeles (“County”), approximately 12 miles southwest of downtown Los Angeles, in the City’s southeast portion, at 16829, 16835, and 16907 South Normandie Avenue; see **Exhibit 2-1: Regional Vicinity Map**. The City encompasses approximately 6.0 square miles in the County’s South Bay region. Gardena is bordered by the City of Hawthorne and unincorporated County lands to the north, the Cities of Los Angeles and Torrance to the south, the City of Los Angeles to the east, and unincorporated County lands and the Cities of Hawthorne and Torrance to the west. Gardena is an urbanized city with a mix of residential densities, although low-density residential uses predominate. The City also contains a mix of retail, commercial, office, and industrial uses. As depicted on **Exhibit 2-2: Local Vicinity Map**, the approximately 5.25-acre Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. **Table 2-1: Existing Onsite Land Uses** summarizes the existing onsite land uses by address and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. However, approximately 9,324 SF of industrial floor area in one of the buildings on Parcel 4 is in a dilapidated condition, thus, is not being used or occupiable. Therefore, approximately 106,100 SF of the existing industrial land uses are currently operating.



Electricity

Southern California Edison (SCE) provides electrical services to the City through state-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, electricity generation is not usually tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatts (MW). Net generation refers to the gross amount of energy produced by a unit; minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

Natural Gas Services

Southern California Gas Company (SoCalGas) provides natural gas services to the City and County. Natural gas is a hydrocarbon fuel found in reservoirs beneath the Earth's surface and is composed primarily of methane (CH₄). It is used for space and water heating, process heating and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in coming years because it is a relatively clean alternative to other fossil fuels (e.g., oil and coal). In California and throughout the western United States, many new electrical generation plants fired by natural gas are being brought online. Thus, there is great interest in importing liquefied natural gas from other parts of the world. California's natural gas-fired electric generation accounted for 50.2 percent of in-state generation.

The City's ongoing development review process includes a review and comment opportunity for privately owned utility companies to provide input on all development proposals. The input facilitates a detailed review of projects by service purveyors to assess the potential demands for utility services on a project-by-project basis. The ability for utility providers to provide services concurrently with each project is evaluated during the development review process. Utility companies are bound by contract to update energy systems to meet any additional demand.

Energy Usage

Energy usage is typically quantified using the British Thermal Unit (BTU). Total energy usage in California was 6,922.8 trillion BTUs in 2020 (the most recent year for which this specific data is available). Of California's total energy usage, the transportation sector consumes the most energy, see **Table 4.3-1: California's Total Energy Usage 2020**. Electricity and natural gas in California are generally consumed by stationary uses such as residential, commercial, and industrial land uses, whereas petroleum consumption is generally accounted for by



transportation-related energy use. In 2021, taxable gasoline sales (including aviation gasoline) in California accounted for 13,060,407,775 gallons of gasoline.

Table 4.3-1: California’s Total Energy Usage 2020

Sector	Percentage of Total Consumption
Transportation	34%
Industrial	24.6%
Commercial	19.6%
Residential	21.8%

Source: California Energy Commission. (2020). *Electricity Consumption by County*. <http://www.ecdms.energy.ca.gov/>. Accessed January 2023.

The electricity consumption attributable to the County from 2011 to 2021 is shown in **Table 4.3-2: Electricity Consumption in Los Angeles County 2011-2021**. Electricity consumption in the County increased steadily between 2011 and 2014 with a slight decrease in 2013, and relatively decreased between 2015 and 2021.

The natural gas consumption attributable to the County from 2011 to 2021 is shown in **Table 4.3-3: Natural Gas Consumption in Los Angeles County 2011-2021**. Natural gas consumption in the County relatively decreased between 2011 and 2015 with an increase in 2013, increased between 2015 and 2019, and decreased between 2019 and 2021.

Automotive fuel consumption in the County from 2011 to 2021 is shown in **Table 4.3-4: Automotive Fuel Consumption in Los Angeles County 2011-2021**. As shown in **Table 4.3-4**, on-road automotive fuel consumption in the County relatively increased from 2011 to 2016, decreased between 2018 and 2020, and increased in 2021. Heavy-duty vehicle fuel consumption increased between 2012 and 2017, decreased between 2017 and 2020, and increased in 2021.



Table 4.3-2: Electricity Consumption in Los Angeles County 2011-2021

Year	Electricity Consumption (in millions of kilowatt hours)
2011	68,180
2012	69,248
2013	68,342
2014	69,924
2015	69,503
2016	69,390
2017	68,632
2018	67,887
2019	66,805
2020	65,650
2021	65,375

Source: California Energy Commission. (2021). *Electricity Consumption by County*. <http://www.ecdms.energy.ca.gov/>. Accessed January 2023.

Table 4.3-3: Natural Gas Consumption in Los Angeles County 2011-2021

Year	Natural Gas Consumption (in millions of therms)
2011	3,055
2012	2,985
2013	3,065
2014	2,794
2015	2,761
2016	2,878
2017	2,956
2018	2,922
2019	3,048
2020	2,937
2021	2,881

Source: California Energy Commission. (2021). *Natural Gas Consumption by County* <http://www.ecdms.energy.ca.gov/>. Accessed January 2023.



Table 4.3-4: Automotive Fuel Consumption in Los Angeles County 2011-2021

Year	On-Road Automotive Fuel Consumption (gallons)	Heavy-Duty Vehicle/Diesel Fuel Consumption (Construction Equipment) (gallons)
2011	3,745,485,930	434,920,563
2012	3,714,743,617	430,477,995
2013	3,720,160,331	453,247,552
2014	3,754,124,477	457,345,104
2015	3,864,098,889	462,749,587
2016	3,990,292,164	489,895,770
2017	3,961,448,725	506,904,226
2018	3,914,668,171	494,484,395
2019	3,844,847,561	492,605,543
2020	3,381,588,164	491,579,947
2021	3,816,162,983	507,214,212

Source: California Air Resources Board. (2021). *EMFAC2021*.

4.3.2 REGULATORY SETTING

State

California Code of Regulations (California Building Standards Code) Title 24

California Code of Regulations Title 24, also known as the California Building Standards Code, includes regulations for how buildings are designed and constructed. Title 24 is comprised of 12 "Parts." The Title 24 Parts relevant to energy efficiency are described below.

Title 24 Part 3 - California Electrical Code. The California Electrical Code (CEC) contains electrical design and construction standards.

Title 24 Part 6 - California Energy Code. The California Energy Code contains energy conservation standards applicable to all residential and non-residential buildings throughout California, including schools and community colleges. Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission [CEC]) in June 1977 and are updated every three years. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On June 10, 2015, the CEC adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. The 2022 Standards went into effect January 1, 2023.



The 2016 Standards improved upon the previous 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2016 Standards, residential buildings are 28 percent more energy efficient and nonresidential buildings are 5 percent more energy efficient than under the 2013 Standards. Buildings that are constructed in accordance with the 2013 Building Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the prior 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features.

The 2019 Standards improve upon the 2016 Standards. Under the 2019 Title 24 standards, residential buildings will be about 7 percent more energy efficient, and when the required rooftop solar is factored in for low-rise residential construction, residential buildings that meet 2019 Title 24 standards use approximately 53 percent less energy than those built to meet the 2016 standards.

The 2022 Standards went into effect January 1, 2023. The updated Standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Title 24 Part 11 - California Green Building Standards (CALGreen Code). The CALGreen Code contains standards applicable to residential and non-residential buildings throughout California, including schools and community colleges. The CALGreen Code is intended to improve public health, safety, and public welfare through sustainable construction practices. The CALGreen Code is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The state adopted the most recent update to the CALGreen Code in 2022 and it went into effect January 1, 2023.

California Public Utilities Commission (CPUC) Energy Efficiency Strategic Plan

The California Public Utilities Commission (CPUC) prepared an Energy Efficiency Strategic Plan in 2011 with the goal of promoting energy efficiency and a reduction in greenhouse gases. Assembly Bill 1109, adopted in 2007, also serves as a framework for lighting efficiency. AB 1109 required the State Energy Resources Conservation and Development Commission to adopt minimum energy efficiency standards as a means to reduce average Statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. According to the Energy Efficiency Strategic Plan, lighting comprises approximately one-fourth of California's electricity use while non-residential sector exterior lighting (parking lot,



area, walkway, and security lighting) usage comprises 1.4 percent of California’s total electricity use, much of which occurs during limited occupancy periods.

Renewable Portfolio Standard

In 2002, California established its Renewable Portfolio Standard program with the goal of increasing the annual percentage of renewable energy in the state’s electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California’s commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the California Air Resources Board (CARB) under its AB 32 authority to enact regulations to help the state meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, CARB adopted its Renewable Electricity Standard regulations, which require all the state’s load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the program’s goals to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Local

City of Gardena General Plan

The Gardena 2006 General Plan (“GGP”) Community Resource Element provides a Conservation Plan with the following goals and policies for the treatment of energy resources:

- **CN Goal 4:** Conserve energy resources through the use of technology and conservation methods
 - Policy CN 4.1: **Encourage innovative building designs that conserve and minimize energy consumption.**
 - **Policy CN 4.2: Require compliance with Title 24 regulations to conserve energy.**

City of Gardena Climate Action Plan

The City of Gardena adopted their Climate Action Plan (CAP) in December 2017 as a joint effort between Gardena and the South Bay Cities Council of Governments. The CAP is a guide to reduce GHG emissions by identifying strategies at the local level to help the state meet long-term GHG



emission reduction goals. These strategies are separated into five main categories including Land Use and Transportation, Energy Efficiency, Energy Generation, Solid Waste, and Urban Greening. Goals and strategies applicable to the Project are as follows:

- **Goal LUT: B – Encourage Ride Sharing**
 - **Sub-strategy LUT:** B1.2 Facilitate ride-hailing and ride-sharing.
- **Goal LUT: D – Adopt Active Transportation Initiatives**
 - **Sub-strategy LUT:** D2.2 Require new developments to provide pedestrian, bicycle, and transit amenities.
 - **Sub-strategy LUT:** D2.3 Require commercial and multi-family residential projects to provide permanent bicycle parking facilities.
- **Goal LUT: E – Parking Strategies**
 - **Sub-strategy LUT:** E2.2 Encourage developers of new development to unbundle parking and eliminate the assignment of specific stalls.
- **Goal LUT: G – Land Use Strategies**
 - **Sub-strategy LUT: G1.1** Encourage higher density through general plan appropriately in targeted areas.
 - **Sub-strategy LUT: G1.2** Encourage higher density through zoning code appropriately in targeted areas.
 - **Sub-strategy LUT: G1.3** Increase housing density near transit.
- **Goal EE: B – Increase Energy Efficiency in New Residential Developments**
 - **Sub-strategy EE: B1.1** Educate City staff, developers, etc. on future Title 24 updates and the additional energy efficiency opportunities for new residential development.
- **Goal EE: E – Increase Energy Efficiency Through Water Efficiency**
 - **Sub-strategy EE: E1.2** Require low-irrigation landscaping.

4.3.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning energy. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant environmental impact if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation (see Impact 4.3-1);
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency (see Impact 4.3-2).



Methodology and Assumptions

This section focuses on the three sources of energy that are relevant to the proposed Project: electricity; natural gas; and transportation fuel for vehicle trips associated with the Project, as well as the fuel necessary for Project construction.

Construction-related electricity use would be associated with water use for dust control and electric vehicles projected to be in the on-road fleet. Construction-related consumption of natural gas would occur from natural gas fuel consumption from construction vehicles. The analysis of the Project's construction fuel use is based on the California Emissions Estimator Model (CalEEMod), which quantifies construction equipment activity. Fuel usage associated with off-road construction equipment and on-road construction mobile trips is calculated based on vehicle fuel efficiency in miles per gallon. Construction fuel consumption is calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The CalEEMod emissions are specific to construction year and include fleet adjustments based on current regulations and equipment turnover.

Operational-related electricity use would occur from building energy and would consist of constant day-to-day building energy and water use. Operational-related consumption of natural gas would occur from space heating and cooling, cooking, fireplaces, and laundry. However, Title 24 standards requires all new residential construction to be all electric and not connect to natural gas supply. The electricity and natural gas use during Project operations is calculated using respective CalEEMod default rates based on building use type. The gasoline and diesel fuel consumption associated with on-road vehicular trips is calculated based on total annual operational VMT, CalEEMod default vehicle fleet mix informed by the EMFAC model, and average fuel economy derived from the United States Department of Transportation. The CalEEMod emissions and default rates are specific to the construction year and operational year and include fleet adjustments based on current regulations and equipment turnover. The results of CalEEMod and energy calculations are included in **Appendix 4.3-1**.

4.3.4 PROJECT DESIGN FEATURES

The following Project design features (PDF) were incorporated into the analysis:

- **PDF AQ-2/PDF GHG-1:** The Project would comply with the CALGreen Code for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.¹
- **PDF AQ-3/PDF GHG-2:** There would be no natural gas use by any of the Project land uses.²

¹ The Project operational emissions inventory did not quantify this measure, but it has been included here qualitatively.

² The Project operational emissions inventory quantified this measure.



4.3.5 IMPACTS AND MITIGATION MEASURES

Impact 4.3-1:
Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Level of Significance: Less Than Significant Impact

As previously noted, the existing onsite industrial land uses total approximately 115,424 SF. However, approximately 9,324 SF of industrial floor area is in a dilapidated condition, thus, is not being used or occupiable. The Project’s net energy consumption is summarized in **Table 4.3-5: Project and Countywide Energy Consumption**.

Table 4.3-5: Project and Countywide Energy Consumption

Energy Type	Existing Project Site Energy Consumption ¹	Proposed Project Annual Energy Consumption	Net Annual Energy Consumption Attributable to Project	Los Angeles County Annual Energy Consumption ^{2,3}	Percentage of Countywide Consumption
Project Construction					
Diesel ⁴	--	138,115 gallons	138,115 gallons	507,214,212 gallons	0.0272%
Gasoline ⁴	--	111,682 gallons	111,682 gallons	3,816,162,983 gallons	0.0029%
Project Operations					
Electricity	875,071 kWh	4,017,999 kWh	3,142,928 kWh	65,374,721,369 kWh	0.0048%
Natural Gas	3,929 therms	0 therms	-3,929 therms	2,880,994,891 therms	-0.0001%
Diesel ⁴	3,055 gallons	25,314 gallons	22,259 gallons	507,214,212 gallons	0.0044%
Gasoline ⁴	34,091 gallons	272,283 gallons	238,193 gallons	3,816,162,983 gallons	0.0062%
Notes:					
1. Existing energy consumption based on estimated operational modeling provided in the Air Quality Technical Report prepared by Ramboll US Consulting, Inc. (December 2022).					
2. The Project increases in electricity and natural gas consumption are compared with the total consumption in Los Angeles County in 2021.					
3. The Project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2021.					
4. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.					
5. Construction fuel consumption is based on equipment and load factors from California Emissions Estimator Model (CalEEMod version 2020.4.0) and the Air Quality Technical Report prepared by Ramboll US Consulting, Inc. (December 2022).					
6. The estimated construction fuel consumption is based on the Project’s construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips provided in the Air Quality Technical Report prepared by Ramboll US Consulting, Inc. (December 2022).					
Refer to Appendix 4.3-1 for assumptions used in this analysis.					



Construction-Related Energy

During Project construction, little to no electrical and natural gas consumption is anticipated since construction vehicles and equipment are generally diesel-powered. During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, paving, and building construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Some incidental energy conservation would occur during construction through compliance with state requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials.

As indicated in **Table 4.3-5**, the Project's construction-related diesel and gasoline fuel consumption would be approximately 138,115 gallons and approximately 111,682 gallons, respectively, which would result in a nominal increase in fuel use in the County. Construction-related off-road automotive fuel consumption would constitute approximately 0.0272 percent of the County's diesel consumption and approximately 0.0029 percent of the County's gasoline consumption. As such, Project construction would have a minimal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.



Operational Energy

Electricity and Natural Gas

Project operations would require approximately 3,142,928 additional kWh of electricity per year and (compared to existing conditions). The Project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 36 percent of total procurement by 2020 and to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures projects will not waste finite energy resources.

As indicated in **Table 4.3-5**, the Project's net operational electricity consumption would represent less than 0.01 percent of electricity consumption in the County. The Project would adhere to all federal, state, and local requirements for energy efficiency, including the Title 24 standards. As such, the Project would not result in the inefficient, wasteful, or unnecessary consumption of electric energy.

Pursuant to Title 24 standards, the Project would be all electric and would not connect to natural gas supply. Therefore, the Project's net operational natural gas consumption would be a decrease of approximately -3,929 therms; see **Table 4.3-5**.

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. **Table 4.3-5** provides an estimate of the daily fuel consumed by vehicles traveling to and from the Project site. As indicated in **Table 4.3-5**, Project operations are estimated to consume approximately 22,259 additional gallons of diesel fuel and 238,196 additional gallons of gasoline fuel per year (compared to existing conditions), which would result in less than approximately 0.01 percent increase in Countywide consumption, respectively. The Project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.



Additionally, the Project’s proposed apartment building would provide 1.2 parking spaces per unit, including approximately 40 electric vehicle (EV) charging stations, to encourage carpooling or other alternate modes of transportation. The Project would also include approximately 173 bicycle parking spaces and offsite sidewalk improvements along the south end of 169th Street to enhance access to public transit (GTrans, Torrance Transit, and Metro). Further, new residents who sign a 12-month lease would be offered one free monthly Metro pass. Incorporation of these Project features will further encourage reduction in the Projects automotive fuel energy consumption.

As shown in **Table 4.3-5**, the increase in electricity and automotive fuel consumption over existing conditions is minimal. For the reasons described above, the Project would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand. Considering these requirements and design features including the elimination of natural gas consumption at the Project site, the Project would not result in the inefficient, wasteful, or unnecessary use of building energy. Therefore, the Project would result in a less than significant impact in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

<p>Impact 4.3-2: Would the Project conflict with or obstruct state or local plan for renewable energy or energy efficiency?</p>
<p><i>Level of Significance: Less Than Significant</i></p>

Title 24 contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California’s energy demand. Specifically, Title 24 addresses various energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including energy impacts of building envelopes such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Additionally, the Project would comply with Title 24 Part 6, which specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. In accordance with Title 24 Part 6, the Project would have:

- Sensor-based lighting controls - for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light;
- Electrical components providing electric-ready buildings (allowing for electric heating, cooking, and clothes drying); and



- Efficient equipment - improved technology offers significant savings through more efficient equipment and appliances.

Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the Project under the California Green Building Standards Code. As discussed above, the Project would result in an increased demand for electricity and petroleum. In accordance with Title 24 Part 11 mandatory compliance, the Project would have:

- 50 percent of its construction and demolition waste diverted from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Low pollutant emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring and particle boards; and
- A 20 percent reduction in indoor water use.

Compliance with all these mandatory measures would decrease the consumption of electricity and petroleum.

As discussed in **Section 4.5: Greenhouse Gas Emissions**, the Project would be consistent with the primary goals and strategies in the City of Gardena CAP, which maintains the Energy Efficiency Climate Action Plan (EECAP) previously adopted by the City. The Project is consistent with the CAP's primary strategies that are related to land use development, including land use and transportation, energy efficiency, solid waste, and urban greening.

The Project would not conflict with any federal, state, or local plans for renewable energy and energy efficiency. Because the Project would comply with Title 24 Parts 6 and 11 and with the City's CAP measures, no conflict with existing energy standards and regulations would occur. Therefore, the Project's potential impacts associated with renewable energy or energy efficiency plans would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.3.6 CUMULATIVE IMPACTS

For purposes of this energy analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic context for cumulative analysis of energy is the County of Los Angeles.

As concluded previously, Project construction and operations would result in the consumption of fuel and energy, but it would not do so in a wasteful manner. The consumption of fuel and energy would not be substantial in comparison to Countywide electricity, gasoline, and diesel consumption; see **Table 4.3-1** through **Table 4.3-4**. For the reasons described above, the Project



would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand. New capacity or supplies of energy resources would not be required. Additionally, the Project would be subject to compliance with all federal, state, and local requirements for energy efficiency, and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Project impacts, in conjunction with cumulative development in the site vicinity, would increase urbanization and result in increased energy consumption. Potential land use impacts are site-specific and require evaluation on a case-by-case basis. Each cumulative project would require separate discretionary approval and CEQA assessment, which would address potential energy consumption impacts and identify necessary mitigation measures, where appropriate.

As concluded previously, the Project would result in a less than significant impact on energy. Therefore, when combined with cumulative development, the Project's potential impacts to energy would not be cumulatively considerable.

4.3.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning energy have been identified.

4.3.8 REFERENCES

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***4.4 GEOLOGY, SOILS, AND
PALEONTOLOGICAL RESOURCES***



4.4 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

This section describes the existing and regulatory conditions related to geology/soils and paleontological resources and analyzes the Project's potential to cause a substantial adverse effect directly or indirectly destroy a unique paleontological resource, paleontological site, site, or unique geologic feature. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant impacts.

Information in this section is based primarily on the General Plan Environmental Impact Report (EIR) and geology and soils data provided in the Preliminary Geotechnical Investigation, Proposed 5.5-Acre Apartment and Townhome Development, 16831 & 16911 South Normandie Avenue, Gardena, California ("Preliminary Geotechnical Investigation"); see **Appendix 4.4-1: Preliminary Geotechnical Investigation**.

It is noted that, Iwasa Consulting conducted a third-party review of the Project's analysis on behalf of the City; see **Appendix 4.4-1**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

The Project's potential impacts concerning geology and soils are addressed in **Section 7.0: Effects Found Not to be Significant**.

4.4.1 EXISTING SETTING

Paleontological Setting

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the history of the earth and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area.

The Project site is located in the Los Angeles Basin, a structural depression approximately 50.0 miles long and 20.0 miles wide in the northernmost Peninsular Ranges Geomorphic Province.¹ The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 to 3 million years ago (MYA). While sediments dating back to the Cretaceous (66 MYA) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 MYA). Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments were marine, until sea level dropped in the Pleistocene, and began depositing of the alluvial

¹ City of Gardena.(2006). *Final Environmental Impact Report for the City of Gardena General Plan 2006, updated 2022*. Retrieved from: <https://cityofgardena.org/general-plan/>, accessed May 2023.



sediments that compose the uppermost units in the Los Angeles Basin creating a coastal alluvial plain.

Within this extensive alluvial plain, the Project site is situated on an uplifted marine alluvium and terrace landform, with remnant alluvial fans and uplifted alluvium and estuarine deposits. Several major watercourses drain the Los Angeles Basin, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. The Project site is within a fully urbanized setting on an open-aspect plain at an elevation of approximately 40 feet above mean sea level. An 1896 topographic map shows that before urbanization, the Project site was on a relatively level alluvial plain approximately 0.2 mile northwest of the Dominguez Slough.

The Project site is in the Qae unit for a characterization of the soil and geophysical setting.² The sediments that form the Qae unit were deposited before approximately 12,500 years ago, during the late Pleistocene. Soils within the project site are described as unconsolidated to weakly consolidated alluvial sediments, characterized by alluvial gravel, sand, and clay. The soils are further characterized as Windfatch loam with overly uplifted alluvium and terraces, varying from 8 centimeters to 2 meters (3–78 inches) deep and consisting of pale brown to dark brown, friable, moderate to blocky-textured clay loam.

Ice Age sediments, such as those found on site and described above, have a rich fossil history in Southern California, including the Los Angeles Basin. The most common Pleistocene terrestrial mammal fossils include the bones of mammoth, bison, deer, and small mammals, but other taxa, including horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, have been reported, as well as reptiles such as frogs, salamanders, and snakes. In addition to illuminating the differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction, ecology, and climate change. There are numerous fossil localities in Pleistocene-aged alluvium throughout the Los Angeles Basin, the closest of which is approximately 1.2 miles southwest of the Project site. Therefore, these sediments are assigned high paleontological potential.

4.4.2 REGULATORY SETTING

Federal

Paleontological Resources Preservation Act

The federal Paleontological Resources Preservation Act of 2002 codified the generally accepted practice of limiting collection of vertebrate fossils and other rare and scientifically significant fossils on public (federal) land. Because the Project site is not on federal lands, the provisions of this Act do not apply to the Project.

² Appendix 4.4-1, Figure 2.



The National Environmental Policy Act (NEPA) of 1969

The National Environmental Policy Act of 1969 (NEPA) recognizes the continuing responsibility of the federal government to “preserve important historic, cultural, and natural aspects of our national heritage...” (§1010 42 USC §4321; No. 382). With the Passage of the Paleontological Resources Preservation Act, paleontological resources are considered a significant resource, and it is therefore now standard practice to include paleontological resources in NEPA studies in all instances where there is a possible impact. As the Project area is not on federal lands, the provisions of this Act do not apply to the Project.

State

Public Resources Code §5097.5

Requirements for paleontological resource management are included in Public Resources Code (PRC) Division 5, Chapter 1.7, §5097.5 which states in part:

“(a) A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological, or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.”

Subsection (c) makes violation of the section a misdemeanor.

Additionally, PRC §30244 requires reasonable mitigation measures where development would adversely impact archaeological or paleontological resources identified by the State Historic Preservation Officer.

Local agencies are required to comply with these provisions for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Local

Gardena Municipal Code (GMC) §18.42.210.C – Post Permit Requirements, Paleontological Resources

This section establishes the following procedures to protect any paleontological resources which may potentially be discovered during any ground-disturbing activities associated with project construction.

1. Prior to commencement of ground-disturbing activities a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall develop worker environmental awareness 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.

2. If fossils or fossil-bearing deposits are encountered during ground-disturbing activities, work within a twenty-five-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.

4.4.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning geology, soils, and paleontological resources. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? See Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking.
 - iii) Seismic-related ground failure, including liquefaction.
 - iv) Landslides(see **Section 7.0: Effects Found Not to be Significant**)
- Result in substantial soil erosion or the loss of topsoil (see **Section 7.0: Effects Found Not to be Significant**).
- 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 (see **Section 7.0: Effects Found Not to be Significant**).



- 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 (see **Section 7.0: Effects Found Not to be Significant**).
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (see **Section 7.0: Effects Found Not to be Significant**).
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (see Impact 4.5-1).

4.4.4 IMPACTS AND MITIGATION MEASURES

Impact 4.4-1:

Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Level of Significance: Less Than Significant With Mitigation Incorporated

The potential for fossil occurrence depends on the rock type exposed at the surface in a given area and potential effects to paleontological resources would primarily be associated with ground disturbing activities. Paleontological resources are found in geologic deposits of sedimentary rock (i.e., sandstone, siltstone, mudstone, claystone, or shale). As previously noted, the Project site's surface area consists of weakly consolidated alluvial sediments dating back to the late Pleistocene, which are of an age to preserve fossil resources and have high paleontological potential. The Natural History Museum of Los Angeles County has records of numerous fossil localities from the same geologic units as exist in the Project area.

As depicted on **Exhibit 2-2: Local Vicinity Map**, the Project site is fully developed with industrial land uses. The Project proposes to remove the existing land uses and, in their place, construct a new 403-dwelling unit residential development. Previous construction-related excavation on the Project site has disturbed sediments beyond depths at which buried prehistoric cultural resources are likely. Notwithstanding, the potential exists for accidental discovery of paleontological resources during ground-disturbing activities. Should fossil resources be present in the Project site's subsurface, ground-disturbing activities associated with excavations could directly or indirectly destroy a unique paleontological resource.

To address potential impacts to paleontological resources that may be discovered during ground-disturbing activities, the Project would be subject to compliance with GMC §18.42.210, included as Condition of Approval (COA) GEO-1 and GEO-2, which require a qualified vertebrate paleontologist to develop and implement training for construction personnel, and which details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. Additionally, the Project would require Mitigation Measure (MM) GEO-1, which pertains to retaining a Project Paleontologist and preparation of a monitoring plan. Following



compliance with COA GEO-1 and COA GEO-2, and with MM GEO-1 incorporated, the Project's potential impacts concerning directly or indirectly destroying a unique paleontological resource or site or unique geologic feature would be less than significant. Therefore, Project impacts would be less than significant with mitigation incorporated.

CONDITIONS OF APPROVAL

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.

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. Auguring, potholing, and pile driving activities do not need to be monitored as these activities are unlikely to produce significant fossil because information about formation, depth, or context is impossible to discern. Should similar activities be planned, the qualified paleontologist shall be consulted prior to commencement so they may determine if that activity requires monitoring.

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.

MITIGATION MEASURES

MM GEO-1: Paleontological Resources Monitor. Monitoring shall be conducted by a Paleontological Resources Monitor, defined as one who meets the SVP standards for a Paleontological Resources Monitor. The Paleontological Resources Monitor shall be under the supervision of the Project Paleontologist. A Project Paleontologist shall prepare a Paleontological Resources Monitoring and



Mitigation Plan (PRMMP). As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments that occur in previously undisturbed sediment, which has been estimated as any portion of the Project site where excavation exceeds 0.9 m (3.0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated.

4.4.5 CUMULATIVE IMPACTS

For purposes of the paleontological resource impact analysis, cumulative impacts are considered for cumulative development within Gardena; see **Table 3-1: List of Cumulative Projects**. The geographical context of the cumulative analysis for paleontological resources is the City of Gardena.

Should fossil resources be present in the Project site's subsurface, ground-disturbing activities associated with excavations could directly or indirectly destroy a unique paleontological resource. With implementation of the COAs and MMs, the Project's potential impacts to paleontological resources would be reduced to less than significant. Cumulative projects could involve excavations that destroy known or as-yet undiscovered paleontological resources specific to those development sites. However, as with the Project, cumulative development would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to paleontological resources. On a project-by-project basis, all development would be subject to compliance with the established federal, state, and local regulatory framework concerning protection of paleontological resources, which would include compliance with GMC §18.42.210. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts to paleontological resources would be less than significant given compliance with the established regulatory framework, COA, and site-specific MM requirements.

4.4.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to paleontological resources have been identified.

4.4.7 REFERENCES

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An architectural rendering of a modern, multi-story apartment building. The building features a central courtyard with a swimming pool, lounge chairs, and a small table. The pool is surrounded by a wooden deck and a glass railing. There are several trees and plants in the courtyard. The building has a mix of white and grey facades with large windows and balconies. In the foreground, there are several rooftop terraces with wooden decking and some furniture. The overall scene is bright and modern.

4.5 GREENHOUSE GAS EMISSIONS



4.5 GREENHOUSE GAS EMISSIONS

The purpose of this section is to describe the existing regulatory and environmental conditions related to greenhouse gas (GHG) emissions and analyze the Project's potential to generate GHG emissions that may have a significant impact on the environment and/or to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based primarily on the *Greenhouse Gas Technical Report – Normandie Apartments Project – Gardena, California (“GHG Technical Report”)* (Ramboll Americas Engineering Solutions, Inc., 2023); see **Appendix 4.5-1: GHG Technical Report**.

Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the GHG Technical Report; see **Appendix 4.5-1**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and State CEQA Guidelines.

4.5.1 EXISTING SETTING

Regional Setting

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead “trapped,” resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.



GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO₂ emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remains stored in the atmosphere.¹ **Table 4.5-1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

Table 4.5-1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO ₂)	CO ₂ is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO ₂ emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO ₂ is variable because it is readily exchanged in the atmosphere. CO ₂ is the most widely emitted GHG and is the reference gas (Global Warming Potential [GWP] of 1) for determining GWPs for other GHGs.
Nitrous Oxide (N ₂ O)	N ₂ O is largely attributable to agricultural practices and soil management. Primary human-related sources of N ₂ O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N ₂ O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N ₂ O is approximately 120 years. The GWP of N ₂ O is 298.
Methane (CH ₄)	CH ₄ , a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH ₄ include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH ₄ is about 12 years and the GWP is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is

¹ Intergovernmental Panel on Climate Change. (2013). *Carbon and Other Biogeochemical Cycles*. In: *Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*.



Greenhouse Gas	Description
	increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year GWP of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth’s surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. GWPs range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth’s surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. GWPs for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF ₆)	SF ₆ is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The GWP of SF6 is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year GWPs of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF ₃)	NF ₃ was added to Health and Safety Code §38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high GWP of 17,200.
Sources: 1. U.S. EPA. (2023). <i>Overview of Greenhouse Gases</i> . Retrieved from: https://www.epa.gov/ghgemissions/overview-greenhouse-gases . 2. U.S. EPA. (2023). <i>Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021</i> . 3. U.S. EPA. (2010). <i>Methane and Nitrous Oxide Emission from Natural Sources</i> .	

4.5.2 REGULATORY SETTING

Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.



Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (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 Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO₂ in model year 2025, on an average industry fleet-



wide basis, which is equivalent to 54.5 miles per gallon (mpg) if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the U.S. EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 mpg), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program applies to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.²

On September 27, 2019, the U.S. EPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program” (84 Fed. Reg. 51,310 (Sept. 27, 2019)).³ The SAFE Rule (Part One) revoked California’s authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO₂ emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration has repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound

² U.S. EPA and NHTSA. (2016). *Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles – Phase 2*. Retrieved from: <https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed June 2023.

³ U.S. EPA and NHTSA. (2019). *Federal Register*, Vol. 84, No. 188, *The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program*, September 27, 2019. Retrieved from: <https://www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf>. Accessed June 2023.



science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.⁴

State

California Air Resources Board

The California Air Resources Board (CARB) is responsible for coordination and oversight of State and local air pollution control programs. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO₂ equivalents (CO₂e) in the world and produced 459 gross million metric tons of carbon dioxide equivalent (MMTCO₂e) in 2013. The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State's legislature enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the legislation's major provisions.

Assembly Bill 32 - California Global Warming Solutions Act of 2006

AB 32 instructs the CARB to develop and enforce regulations for reporting and verification of statewide GHG emissions. AB 32 also directs CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resource Board (CARB) Scoping Plan

CARB adopted the Scoping Plan to achieve AB 32 goals. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual").⁵ The Scoping Plan evaluates

⁴ U.S. EPA. (2021). *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026*. Retrieved from: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions>. Accessed June 2023.

⁵ CARB defines business-as-usual (BAU) in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.



opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program.⁶ Additional development of these measures and adoption of the appropriate regulations occurred through the end of 2013. Key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gases with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.
- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years. The mobile Source Strategy includes increasing ZEV buses and trucks.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the

⁶ The Climate Action Team, led by the secretary of the California Environmental Protection Agency, is a group of State agency secretaries and heads of agencies, boards, and departments. Team members work to coordinate statewide efforts to implement global warming emissions reduction programs and the State's Climate Adaptation Strategy.



projected 2020 emissions from 596 MMTCO₂e to 545 MMTCO₂e. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated state led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions 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. By 2016, California had reduced GHG emissions below 1990 levels, achieving AB 32's 2020 goal four years ahead of schedule.

In 2016, the Legislature passed Senate Bill (SB) 32, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan.⁷ The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other federal actions.

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines §15183.5.

⁷ California Air Resources Board. (2017). *California's 2017 Climate Change Scoping Plan*. Retrieved from: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed June 2023.



The 2022 CARB Scoping Plan's key elements focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new residential and mixed-use development in order to determine consistency with the 2022 Scoping Plan.⁸ These approaches are recommendations only and are not requirements. They do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Senate Bill 32 - California Global Warming Solutions Act of 2006: Emissions Limit

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill 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.

Senate Bill 375 - The Sustainable Communities and Climate Protection Act of 2008

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet AB 32's GHG reduction goals. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

Assembly Bill 1493 - Pavley Regulations and Fuel Efficiency Standards

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation

⁸ California Air Resources Board. (2022). *2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions*.



waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for passenger vehicle and light duty truck model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new passenger vehicles are anticipated to emit 34 percent fewer CO₂e emissions and 75 percent fewer smog-forming emissions.

Senate Bill 1368 - Emission Performance Standards

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO₂ per megawatt-hour.

Senate Bill 1078, Senate Bill 107, and Senate Bill X1-2 - Renewable Electricity Standards

SB 1078 requires California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, then Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. SBX1-2 codified the 33 percent by 2020 target.

Senate Bill 350 - Clean Energy and Pollution Reduction Act of 2015

Signed into law on October 7, 2015, SB 350 implements Executive Order B-30-15's goals. The SB 350 objectives are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.



Assembly Bill 398 - Market-Based Compliance Mechanisms

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the state. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air contaminants and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

Senate Bill 150 - Regional Transportation Plans

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with state targets (i.e., 40 percent below 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

Senate Bill 100 - California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Assembly Bill 1346 - Air Pollution: Small Off-Road Engines

Signed into law in October 2021, AB 1346 requires CARB to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. AB 1346 requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

Assembly Bill 1279 - The California Climate Crisis Act

AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to



achieve carbon neutrality, and to identify and implement policies and strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage technologies.

Senate Bill 1020 - 100 Percent Clean Electric Grid

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

Senate Bill 905 - Carbon Sequestration Program

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of State agencies.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

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

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

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S 01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency's development of the 2009 California Climate Adaptation



Strategy. Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the state come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's Renewable Portfolio Standard (RPS) to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal that was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 establishes a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of MMTCO₂e. The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. Executive Order B-30-15 also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent." The executive order directs the California Environmental Protection



Agency, the California Geologic Energy Management Division (CalGEM), and the California Natural Resources Agency to transition and repurpose oil production facilities with a goal toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, §§1601-1608) include standards for new appliances. 23 categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

On August 11, 2021, the California Energy Commission adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code includes updated standards such as new electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores; the promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure to allow for the conversion from natural gas to electricity; and the expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multi-family residences, hotels and motels, tenant spaces, offices (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers). Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CALGreen Code) (CCR Title 24, Part 11) is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen Code standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and



design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The CEC adopted the 2022 CALGreen Code in December 2021, went into effect on January 1, 2023. The 2022 CALGreen code focuses on battery storage system controls, demand management, heat pump space and water heating, and building electrification.

Regional

Southern California Association of Governments (SCAG)

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]). The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15. The 2020 RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals.

The RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The RTP/SCS accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. It is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently.



Local

City of Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) does not contain goals or policies concerning GHG emissions. However, GGP Community Development Element, Circulation Plan, includes the following goals and policies that address vehicle trips:

- **CI Goal 1:** Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.
 - **Policy CI 1.1:** Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.
- **CI Goal 3:** Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.
 - **Policy CI 3.3:** Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.
 - **Policy CI 3.4:** Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system.

City of Gardena Climate Action Plan

The City of Gardena's Climate Action Plan (CAP) was adopted in December 2017 as a joint effort between the City of Gardena and the South Bay Cities Council of Governments. The CAP was developed as a guide to reduce GHG emissions by identifying strategies at the local level to help the State meet long-term GHG emission reduction goals. These strategies are separated into five main categories including Land Use and Transportation (LUT), Energy Efficiency (EE), Energy Generation (EG), Solid Waste (SW), and Urban Greening (UG).

The LUT category contains the following goals and policies that are applicable to the Project:

- Policy LUT B** Facilitate private and public mobility services (ride-hailing, ride-sharing, car-sharing, bike-sharing).
- **Policy Action LUT B1.1:** Facilitate car-sharing.
 - **Policy Action LUT D.2.3:** Facilitate ride-hailing and ride-sharing.
- Policy LUT D** Improve design of development.



- **Policy Action LUT D.2.2:** Require new developments to provide pedestrian, bicycle, and transit amenities.
- **Policy Action LUT D.2.3:** Require commercial and multi-family residential projects to provide permanent bicycle parking facilities.

Policy LUT E2 Unbundle parking costs from property costs.

- **Policy Action LUT E.2.2:** Encourage developers of new development to unbundle parking and eliminate the assignment of specific stalls.

Policy LUT G Increase density.

- **Policy Action LUT G1.1:** Encourage higher density through general plan appropriately in targeted areas.
- **Policy Action LUT G1.2:** Encourage higher density through zoning code appropriately in targeted areas.
- **Policy Action LUT G1.3:** Increase housing density near transit.

The EE category contains the following goals and policies that are applicable to the Project:

Policy E1 Promote or require water efficiency through SB X7-7.

- **Policy Action EE E1.2:** Require low-irrigation landscaping.

Policy E2 Promoting water efficiency standards exceeding SB X7-7.

- **Policy Action EE E2.2:** Allow recycled or grey water uses for non-municipal uses.

Gardena Municipal Code

The Gardena Municipal Code does not contain any standards concerning GHG emissions.

4.5.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning GHG emissions. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project would have a significant environmental impact if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment (see **Impact 4.6-1**)
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs (see **Impact 4.6-2**)

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. Amendments to the State CEQA Guidelines specifically allow lead agencies



to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.⁹

Greenhouse Gas Thresholds

The South Coast Air Quality Management District (South Coast AQMD) formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. The Threshold Working Group was formed to assist South Coast AQMD'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, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Threshold Working Group proposed a tiered approach to evaluating GHG emissions for development projects where the South Coast AQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The South Coast AQMD established a threshold of 10,000 metric tons of CO₂e (MTCO₂e) per year for industrial projects and a 3,000 MTCO₂e threshold was proposed for non-industrial projects but it has not been adopted. The South Coast AQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, the South Coast AQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Threshold Working Group did not provide a recommendation for this approach. The Threshold Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it were below an efficiency-based threshold of 4.8 MTCO₂e per service population per year. Tier 5 would exclude projects that implement offsite mitigation (GHG

⁹ Ramboll US Corporation. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project, Gardena, CA*.



reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening (Project) Thresholds. This analysis assesses the significance of GHG impacts under a single threshold: Compliance with applicable statewide and local regulatory programs designed to reduce GHG emissions consistent with AB 32 and SB 32, including CARB’s 2022 Updated Scoping Plan, the City of Gardena CAP, and the RTP/SCS’ growth assumptions.

To further demonstrate that the Project’s GHG emissions would not create significant impacts, the Project’s emissions inventory is compared to the SCAQMD unadopted, proposed draft screening threshold for residential projects. Because the SCAQMD proposed draft screening threshold is not adopted and relies on outdated statewide goals, this analysis does not rely on this comparison for significance determination and provides it for informational purposes only.

When the SCAQMD unadopted tiered approach is applied to a proposed project, and the project is found not to comply with Tier 1 or Tier 2, the project’s emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by South Coast AQMD is an “interim” screening threshold for stationary source industrial projects where the South Coast AQMD is the lead agency under CEQA. The threshold was termed “interim” because, at the time, South Coast AQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to South Coast AQMD in its adoption of a final threshold. However, no Statewide threshold was ever adopted, and the interim threshold remains in effect.

For projects where South Coast AQMD is not a lead agency, no screening thresholds have been formally adopted. However, in 2008, the South Coast AQMD Threshold Working Group recommended a threshold of 10,000 MTCO₂e/year for industrial projects and 3,000 MTCO₂e/year for residential and commercial projects. The South Coast AQMD staff determined that these thresholds would “capture” 90 percent of GHG emissions from these sectors, “capture” meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).¹⁰

4.5.4 METHODOLOGY AND ASSUMPTIONS

This section describes the methods used to develop the Project’s GHG emissions inventories, which include construction and operational emissions. Sub-categories of GHG operational emissions include the following: area sources, energy use, water and wastewater, solid waste, and mobile sources. These emissions are compared to applicable statewide and local regulatory programs designed to reduce GHG emissions consistent with AB 32. Legislation and rules regarding climate change, as well as the scientific understanding of the extent to which different

¹⁰ South Coast AQMD. (2008). *Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, Attachment E “Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold.* Page 3-2.



activities emit GHGs, continue to evolve; as such, the inventories in this report reflect the guidance and knowledge currently available.

Units of Measurement: Metric Tons of Co2 And Co2e

The term “GHGs” includes gases that contribute to the natural greenhouse effect, such as CO₂, CH₄, N₂O, and water, as well as gases that are only manmade and that are emitted through the use of modern industrial products, such as hydrofluorocarbons (HFCs) and chlorofluorocarbons (CFCs). The most important greenhouse gas in human-induced global warming is CO₂. While many gases have much higher GWPs than CO₂, CO₂ is emitted in such vastly higher quantities that it accounts for 80.1 percent of the GWP of all GHGs emitted by the United States.¹⁰

The effect each of these gases has on global warming is a combination of the volume of their emissions and their GWP. GWP indicates, on a pound for pound basis, how much a gas will contribute to global warming relative to how much warming would be caused by the same mass of CO₂.¹⁹ CH₄ and N₂O are substantially more potent than CO₂, with GWPs of 25 and 298, respectively, see **Table 4.5-1**. GHG emissions are typically measured in terms of mass of CO₂e. CO₂e are calculated as the product of the mass of a given GHG and its specific GWP.

In many sections of this report, including the final summary sections, emissions are presented in units of CO₂e either because the GWPs of CH₄ and N₂O were accounted for explicitly, or the CH₄ and N₂O are assumed to contribute a negligible amount of GWP when compared to the CO₂ emissions from that particular emissions category.

In this report, emissions are presented as metric tons (1,000 kilograms). Additionally, exact totals presented in all tables and report sections may not equal the sum of components due to independent rounding of numbers.

Methodology Resources

CalEEMod®

The GHG Technical Report primarily utilized the California Emission Estimator Model version 2020.4.0 (CalEEMod®) to assist in quantifying the GHG emissions in the inventories presented in this report for the Project. CalEEMod® is a statewide program designed to calculate both criteria air pollutant and GHG emissions from development projects in California. CalEEMod® provides a simple platform to calculate both construction emissions and operational emissions for a land use project. It calculates both the daily maximum and annual average for criteria pollutants as well as total or annual GHG emissions. The model also provides default values for water and energy use.

Additionally, CalEEMod® contains default values and existing regulation methodologies to use in each specific local air district region. Appropriate statewide default values can be utilized if regional default values are not defined. The GHG Technical Report used default factors for the



Los Angeles County area that is within the SCAQMD jurisdiction for the GHG emission inventory, unless otherwise noted in the methodology descriptions below. Details regarding the specific methodologies used by CalEEMod[®] can be found in the CalEEMod[®] User's Guide and associated appendices. The CalEEMod[®] output files are provided for reference in **Appendix 4.5-1** to this report.

Indirect GHG Emissions From Electricity Use

Project-related electricity use results in indirect emissions, due to electricity generation activities occurring at offsite power plant locations. For this Project, Southern California Edison (SCE) would supply electric power to the site.

One-Time Emissions

One-time emissions are those emissions that are not recurring over the Project's life. This includes emissions associated with construction.

Construction Activities

This section describes the estimation of GHG emissions from construction activities at the Project site. The Project's major construction phases included in this analysis are:

- Demolition: involves tearing down of the existing building on the Project site.
- Site Preparation: involves clearing vegetation (grubbing and tree/stump removal) and stones prior to grading.
- Grading: involves the cut and fill of land to ensure the proper base and slope for the construction foundation.
- Building Construction: involves the construction of structures and buildings.
- Architectural Coating: involves the application of coatings to both the interior and exterior of buildings or structures.
- Paving: involves the laying of concrete or asphalt such as in parking lots or roads.

Emissions from these construction phases are largely attributable to fuel use from construction equipment and worker commuting.

Project construction is scheduled to begin in 2024 and be completed in 2027. The construction schedule, grading volumes, demolition waste volumes, and construction trip information is provided in **Appendix 4.5-1**. Construction emissions are estimated assuming one shift working up to eight hours per day, for six days in a week.

Estimated Emissions from Construction Equipment. The construction equipment emission calculations are from off-road equipment engine use based on the equipment list and phase length. Since the majority of the off-road construction equipment used for construction projects



are diesel-fueled, CalEEMod[®] assumes all of the equipment operates on diesel fuel. The construction equipment calculations include the running exhaust emissions from off-road equipment. Since the equipment is assumed to be diesel, there are no starting or evaporative emissions associated with the equipment as these are *de minimis* for diesel-fueled equipment.

Estimated Emissions from On-Road Trips. Construction generates on-road vehicle exhaust (including evaporative emissions) from personal vehicles for worker/vendor commuting and trucks for soil/material hauling. These emissions are calculated using CalEEMod[®] methodology based on the number of trips and vehicle miles traveled (VMT) along with emission factors from EMFAC2017. The numbers of worker and vendor trips were based on project-specific data. The number of haul trips was estimated based on the volume of soil to be exported, the amount of building square footage demolished, and the CalEEMod[®] default assumption for haul truck capacity.

Regulatory Measures. The Project would be subject to compliance with the applicable regulations and programs concerning construction emissions. These include the CARB airborne toxic control measures (ATCM) to limit diesel-fueled commercial motor vehicle idling, and CARB in-use Off-Road and On-Road regulations.

Annual Operational Emissions

Operational emissions are emissions that would occur after Project build-out. This analysis identifies operational emissions for source categories including direct emissions from area and mobile sources and indirect emissions from energy use, water/wastewater, and solid waste management.

Area Sources

Area sources are those emission sources that are generally too small to be uniquely identified as point sources and are thus generally aggregated as a group. CalEEMod[®] estimates emissions for the following sources, which are included under the category of “area” sources: landscaping equipment (e.g., lawn mowers), consumer products, and architectural coatings. There are no GHG emissions from consumer product and architectural coating activities. The area source GHG emissions included in this analysis result from landscaping maintenance equipment related fuel combustion sources, such as lawn mowers. Based on CalEEMod[®] defaults, all operational days (i.e., 250 days per year) were assumed to be summer days, with no snow days.

Regulatory Measures. No applicable regulatory measures related to GHG emissions from landscape maintenance equipment were identified.

Energy Use

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs



directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Climate zone 8 was selected based on the Project location and CalEEMod[®] forecast climate zone map. The Project has no planned natural gas use.

Estimated Emissions from Swimming Pools. The Project proposes two heated pools. This analysis conservatively incorporates the emissions from the electricity associated with heating the pools and the electricity used to power the filters and pumps for 365 days/year.

Estimates Emissions from Building Energy Use. As mentioned above, GHGs are emitted from buildings because of activities for which electricity and natural gas are typically used as energy sources. As previously mentioned, combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. Electricity and natural gas use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances.

Regulatory Measures. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting.¹¹ The 2022 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2023. The Project's GHG emissions calculations reflect that the Project is meeting the 2019 Title 24 Part 6 Building Code for residential and non-residential construction. This is a conservative estimate of the Project's energy use as the Project would meet the 2022 Title 24 Part 6 Building Code. Emission factors for electricity are dependent on statewide renewable energy generation targets. The RPS established a target of 33 percent energy from renewable sources for all electricity providers in California by 2020.

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Additional emissions from wastewater treatment include CH₄ and N₂O, which are emitted directly from the wastewater.

Regulatory Measures. While the Project is subject to compliance with the CALGreen Code, which requires that indoor potable water use be reduced by 20 percent through the use of water saving fixtures and/or flow restrictors, the analysis conservatively uses the CalEEMod default assumptions to estimate GHG emissions associated with the Project's water usage.

¹¹ Ramboll US Corporation. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project, Gardena, CA.*



Solid Waste

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, recycling, or composting. CalEEMod[®] calculates the indirect GHG emissions associated with waste that is disposed of at a landfill. The program uses annual waste disposal rates from the CalRecycle data for individual land uses. CalEEMod[®] uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. The program quantifies the GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon. The program quantifies the CO₂ emissions associated with the combustion of methane, if applicable.

Regulatory Measures. While the Project is expected to comply with the state's waste diversion goal of 75 percent waste diversion by 2020,¹² this analysis conservatively uses the default CalEEMod[®] assumptions for estimates GHG emissions associated with waste disposal.

Mobile Source Emissions

The GHG emissions associated with on-road mobile sources are generated by employees and trucks visiting the Project. The emissions associated with on-road mobile sources includes running exhaust emissions, starting emissions and idling exhaust emissions. Running exhaust emissions are dependent on VMT. Starting emissions are associated with the number of starts or time between vehicle uses and the assumptions used in determining these values are described below. Idling exhaust emissions are based on the amount of time a vehicle spends idling.

Vehicle Trip Type. In CalEEMod[®], the trip type breakdown describes the purpose of the trip generated at each land use. For example, the trip type breakdown indicates the percentage of trips generated at single-family home for work, for shopping, and for other purposes. CalEEMod[®] uses various sets of trip type breakdown, based on land use type (e.g., residential, commercial, etc.). The residential trips, as described below, are considered for the Project.¹⁴

- **Residential Trips**— These trips include home-work (H-W), home-shop (H-S), or homeother (H-O). An H-W trip represents the trip from the home to the workplace. An H-S trip represents the trip from the home to a land use where shopping takes place (generally retail). An H-O represents all other types of trips generated from the resident such as school, entertainment, etc.

Trip Rates. Trip rates are one of the parameters used to calculate Project mobile source emissions. CalEEMod[®] relies upon trip generation rates by land use types and associated average trip length by trip type to estimate the GHG (and air pollutant) emissions.

¹² Ramboll US Corporation. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project, Gardena, CA.*



Trip Lengths. Trip lengths are another factor used to calculate Project mobile source emissions. Annual VMT is estimated as a product of annual average trips and trip length for each vehicle type.

Vehicle Fleet Mix. Vehicle fleet mix is another parameter used to estimate mobile source emissions from Project operation. Each vehicle type has a different emission factor for each pollutant, so CalEEMod[®] relies upon vehicle fleet mixes by land use type to estimate the GHG emissions for each land use.

Regulatory Measures. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state. In addition, the NHTSA and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles, and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) would gradually reduce emissions from the proposed project's motor vehicles.

4.5.5 PROJECT DESIGN FEATURES

The following Project design features (PDF) were incorporated into the analysis:

- **PDF AQ-1. Nonroad Diesel Engines:** The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower.¹³
- **PDF AQ-2/PDF GHG-1. Electrical Vehicle Charging Design:** The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.¹⁴
- **PDF AQ-3/PDF GHG-2. All-Electric:** There would be no natural gas use by any of the Project land uses.¹⁵

¹³ The Project construction emissions inventory quantified this measure.

¹⁴ The Project operational emissions inventory did not quantify this measure, but it has been included here qualitatively.

¹⁵ The Project operational emissions inventory quantified this measure.



4.5.6 IMPACTS AND MITIGATION MEASURES

Impact 4.5-1:

Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact 4.5-2:

Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Level of Significance: Less Than Significant Impact

Quantification of Emissions

Construction

The Project's construction GHG emissions were calculated for each year of construction activity using CalEEMod. Results of the GHG emissions calculations are presented in **Table 4.5-2: Summary of Construction GHG Emissions**. It is noted that the GHG emissions shown in **Table 4.5-2** are based on construction equipment operating continuously throughout the workday. In reality, construction equipment tends to operate periodically or cyclically throughout the workday. Therefore, the calculated GHG emissions reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in **Appendix 4.5-1**.

Although the Project's construction related GHG emissions are considered one-time emissions, it is important to include them when assessing all of the Project's long-term GHG emissions. Draft SCAQMD GHG analysis methodologies recommend that construction-related GHG emissions be amortized over a project's 30-year lifetime, in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures would address construction GHG emissions as part of the operational GHG reduction strategies.¹⁵ In accordance with this methodology, the Project's estimated construction GHG emissions have been amortized over a 30-year period and are included in the annualized operational GHG emissions.



Table 4.5-2: Summary of Construction GHG Emissions

Calendar Year	Total Off-Road Emissions	Total On-Road Emissions			Total Construction Emissions ¹
		Worker	Vendor	Hauling	
(MT CO ₂ e)					
2021	234.36	39.86	23.61	52.25	350.09
2022	365.09	301.17	38.28	—	704.53
2023	364.32	375.53	56.40	—	796.25
Total	238.75	244.91	37.10	—	520.76
30-year Amortized					79
1. Construction emissions include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod. CO ₂ e includes CO ₂ , CH ₄ , and N ₂ O emissions, weighted by their respective global warming potentials. 2. CalEEMod - California Emissions Estimator Model CH ₄ = methane; CO ₂ = carbon dioxide; CO ₂ e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N ₂ O = nitrous oxide; yr = year					
Source: Ramboll US Corporation. (2023). Greenhouse Gas Technical Report Table 7; see Appendix 4.5-1 .					

Due to the potential persistence of GHGs in the environment, Project impacts are based on annual emissions and, in accordance with draft SCAQMD methodology, construction-period impacts are not assessed for significance independent of operational-period impacts, which are discussed in the Operations section below.

Operations

The Project’s operational emissions are those that would occur after Project build-out. This analysis identifies operational emissions for source categories including direct emissions from area and mobile sources and indirect emissions from energy use, water/wastewater, and solid waste management. The Project’s maximum annual GHG emissions resulting from area sources, energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, solid waste, and mobile/traffic were calculated for the expected opening year (2027).

The Project’s operational maximum opening year GHG emissions are included in **Table 4.5-3: Summary of Operational GHG Emissions**. Operational or long-term emissions occur over the Project’s lifetime. GHG emissions would result from direct emissions such as Project generated vehicular traffic, onsite combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as offsite generation of electrical power, the energy required to convey water to, and wastewater from the Project site, the emissions associated with solid waste generated at the Project site, and any fugitive refrigerants from air conditioning or refrigerators.



Table 4.5-3: Summary of Operational GHG Emissions

Emission Source	Annual Average GHG Emissions ^{1,2,3} (MTCO ₂ e/year)	
	Project	Existing Conditions ⁴
Area Sources	7	0.003
Energy Usage	577	131
Water	118	97
Solid Waste Disposed	98	50
Mobile/Traffic	1,901	282
<i>Operational Subtotal</i>	<i>2,700</i>	<i>560</i>
Construction Amortized ⁵	79	--
Total	2,779	560
Net Project GHG Emissions (Project minus Existing Conditions)⁶	2,219	
Notes:		
1. Operational emissions (from area sources, energy use, water use, waste disposed and mobile sources) and one-time emissions (from construction and vegetation) were calculated using CalEEMod®. Refer to Appendix 4.5-1 for further details.		
2. Emissions are presented as CO ₂ e, which include CO ₂ , CH ₄ , and N ₂ O emissions, weighted by their respective GWP's.		
3. Energy emissions for Full Buildout Operations include pool electricity usage, see Appendix 4.5-1 for further details.		
4. One-time emissions from construction were amortized over a 30-year period.		
5. SCAQMD proposed draft screening threshold for residential projects. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significancethresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2 . Accessed: November 2022.		
6. Sum of annualized one-time emissions and operational emissions may not add up due to rounding.		
Source: Ramboll US Corporation. (2023). Greenhouse Gas Technical Report, included as Appendix 4.5-1 . Table ES-1.		

As shown in **Table 4.5-3**, the Project would result in an increase in GHG emissions as compared to existing conditions (i.e., operation of the Project site with industrial uses). The Project's net operational emissions would be approximately 2,219 MTCO₂. Therefore, although the Project would generate emissions directly and indirectly, Project emissions would not exceed SCAQMD's bright line, unadopted screening-level threshold. This comparison is provided for informational purposes only.

Applicable GHG Reduction Plans and Policies

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Plans and policies evaluated are AB 32, SB 32, the City of Gardena CAP, SCAG RTP/SCS (SB 375), and the CARB 2022 Scoping Plan Update.

AB 32 and SB 32 Regulatory Programs

The Project would not conflict with the applicable statewide and local regulatory programs. As discussed above, the Project would be subject to a number of regulatory programs intended to reduce GHG emissions consistent with AB 32 and SB 32.



The list below summarizes the regulations and regulatory programs related to the emission source categories:

- Energy Use:
 - CCR Title 20 Standards
 - CCR Title 24, Part 6 Standards (2022)
 - CCR Title 24, Part 11 Standards
 - California Renewable Portfolio Standard (SB X1 2)
- Water Supply, Treatment and Distribution:
 - Executive Order B-29-15
 - CCR Title 24, Part 11 Standards
 - Senate Bill X7-7
- Solid Waste:
 - California AB 341 (waste diversion)
- Mobile Sources:
 - California AB 1493/Pavley Standards (through model year 2025)
 - California Advanced Clean Cars Standards (through model year 2025)
 - California Low Carbon Fuel Standard
 - USEPA/NHTSA CAFE Standards (through model year 2018)
- Construction:
 - CARB In-Use Off-Road Regulation
 - CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation

As previously noted, the net Project emissions are approximately 2,219 MTCO₂, which would not exceed the “bright-line” screening-level threshold of 3,500 MTCO₂e for residential projects. In addition, the Project’s compliance with the regulations and programs noted above would ensure no conflict with AB 32 and SB 32 would occur.

City of Gardena CAP

The City of Gardena’s CAP seeks to identify community-wide strategies to lower GHG emissions and integrates these efforts with the other priorities such as economic development, regional mobility and connectivity, and improving the local air and water quality. The Project would not conflict with the Gardena CAP’s primary goals and strategies. The Project would comply with California Code of Regulations California Green Building Standards Code, Title 24, Part 11 for EV charging design, which would in turn provide 10 percent of parking stalls to be EV capable, 25



percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stalls to be equipped with Level 2 EV chargers. Additionally, the Project would be built to meet the California Building Standards Code Title 24 and the California Green Building Code, which requires that indoor potable water use be reduced by 20 percent through the use of water saving fixtures and/or flow restrictors.

Table 4.5-4: City of Gardena Climate Action Plan Analysis evaluates the Project concerning the City of Gardena CAP. As indicated in **Table 4.5-4**, the Project would not conflict with the CAP’s applicable primary strategies concerning land use development, including land use and transportation, energy efficiency, solid waste, and urban greening. As such, the Project would not conflict with the Gardena CAP concerning goals adopted for the purpose of reducing GHG emissions. A less than significant impact would occur in this regard, and no mitigation is required.

Table 4.5-4: City of Gardena Climate Action Plan Analysis

Strategy	Goal		Project Analysis
Land Use and Transportation (LUT)	A	Accelerate the market for EV vehicles	No Conflict. The Project would designate approximately 40 percent of the 399 parking stalls to be capable, ready, or equipped for EV Chargers. More specifically, the Project would provide 10 percent of parking stalls to be EV capable, 25 percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stall to be equipped with Level 2 EV Chargers.
	B	Encourage ride-sharing	No Conflict. A designated loading area at the apartment building along Normandie Avenue would be signed and distinguished (e.g., with paving and/or paint) such that it may be utilized as a pick-up and drop-off zone for ride-sharing services.
	C	Encourage transit usage	No Conflict. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166 th Street. The Project includes ROW improvements along 169 th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. Per the NCSP, new residents who sign a 12-month lease would be offered a one-time free monthly Metro pass.



Strategy	Goal		Project Analysis
	D	Adopt active transportation initiatives	No Conflict. The Project would provide 173 bicycle parking spaces on the first level of the apartment building (located in secured facilities accessible only by apartment building residents). All bicycle parking would be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.
	E	Parking strategies	No Conflict. The vehicle parking spaces would be unbundled from the rental of the apartment units to encourage alternate modes of transportation.
	F	Organizational strategies	No Conflict. The proposed apartment amenities include a multi-purpose office space to provide workspace for residents that work from home. Additionally, this amenity would encourage future residents to telecommute work and therefore reduce VMT.
	G	Land use strategies	No Conflict. The Project proposes 403 DU at a density of 77 (DU/AC). The apartment building would provide 155 DU/AC and the townhomes would provide 24 DU/AC.
	H	Digital technology strategies	No Conflict. The Project buildings would be capable of connection to a future fiber network in order to implement the South Bay Fiber-Optic Master Plan. ¹⁶
Energy Efficiency (EE)	A	Increase energy efficiency in existing residential units	Not Applicable. The Project does not involve existing residential units.
	B	Increase energy efficiency in new residential developments	No Conflict. The Project would be built to meet the California Green Building Code. Additionally, the proposed pools would use electricity for filters, pumps, and water heating rather than natural gas.
	C	Increase energy efficiency in existing commercial units	Not Applicable. The Project site is currently occupied by industrial uses.
	D	Increase energy efficiency in new commercial developments	Not Applicable. The Project includes only residential uses.
	E	Increase energy efficiency through water efficiency	No Conflict. The Project would be subject to compliance with the California Green Building Code, which requires that indoor potable water use

¹⁶ Magellan Advisors. (2017). *Fiber-Optic Master Plan – Prepared for the South Bay Workforce Investment Board and the South Bay Cities Council of Governments.*



Strategy	Goal	Project Analysis
		be reduced by 20 percent through the use of water saving fixtures and/or flow restrictions.
	F Decrease energy demand through reducing urban heat island effect	No Conflict. The Project would reduce the impervious surface area by 13.8 percent, thereby reducing the temperature of the site and surrounding area. The Project would also provide shade from providing 89 new trees.
	G Participate in education, outreach, and planning for energy efficiency	Not Applicable. The Project is a new residential development, and as such, would not directly be involved in planning for energy efficiency.
	H Increase energy efficiency in municipal buildings	Not Applicable. The Project is a new residential development.
	I Increase energy efficiency in city infrastructure	Not Applicable. The Project is a new residential development, and as such, would not directly be involved in planning for the City’s infrastructure efficiency.
	J Reduce energy consumption in the long- term	No Conflict. New residential and non-residential buildings would be subject to the 2022 Title 24 Part 6 Building Code.
Solid Waste (SW)	A Increase Diversion and Reduction of Residential Waste	No Conflict. The Project would be subject to compliance with the state’s waste diversion goal of 75 percent waste diversion by 2020.
	B Increase Diversion and Reduction of Commercial Waste	Not Applicable. The Project is a new residential development.
	C Reduce and Divert Municipal Waste	Not Applicable. The Project is a new residential development.
Urban Greening (UG)	A Increase and maintain urban greening in the community	No Conflict. The Project includes an increase of approximately 50,493 SF of open space and proposed to plant 89 new trees.
	B Increase and maintain urban greening in municipal facilities	Not Applicable. The Project does not involve municipal facilities.
Energy Generation & Storage (EGS)	A Support energy generation and storage in the community	Not Applicable. The Project is a new residential development, which would be serviced by SCE.
Sources: Refer to Exhibit 2-4: Conceptual Site Plan and Appendix 4.5-1 for assumptions used in this analysis.		



SCAG RTP/SCS

The SCAG RTP is a long-range transportation plan that is developed and updated by SCAG every four years. The RTP provides a vision for transportation investments throughout the region. The SCS will integrate land use and transportation strategies that will achieve GHG emissions reduction targets that are forecasted to achieve reduction in GHG emissions to achieve the state’s 2035 and 2040 GHG reduction goals.

The 2020-2045 RTP/SCS projects an increase of 1.6 million households in the region and approximately 455,000 households in Los Angeles County from 2023 to 2045.¹⁷ For Gardena, the 2020-2045 RTP/SCS projects an increase of 1,077 households between 2023 and 2045.¹⁴ The Project proposes 403 dwelling units (DU), which is approximately 0.03 percent of the projected household growth for the region, approximately 0.09 percent of the projected household growth for Los Angeles County, and approximately 37 percent of the projected household growth for Gardena; see **Section 4.10: Population and Housing** for analysis. Therefore, the Project would not conflict with SCAG’s 2020 RTP/SCS and the SCAQMD 2020 AQMP.

The SCAG RTP also identifies ten goals related to housing, transportation technologies, equity and resilience in order to adequately reflect the increasing importance of these topics in the region. **Table 4.5-5: RTP/SCS Goals Analysis** evaluates the Project’s consistency with these goals. As indicated in **Table 4.5-5**, the Project would not conflict with the RTP/SCS Goals adopted for the purpose of reducing GHG emissions. As such, Project impacts concerning consistency with the RTP/SCS Goals would be less than significant, and no mitigation is required.

Table 4.5-5: RTP/SCS Goals Analysis

Goal		Project Analysis
Goal 1	Encourage regional economic prosperity and global competitiveness.	Not Applicable. The Project proposes residential uses only.
Goal 2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	No Conflict. The Project includes ROW improvements along West 169 th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. The Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169 th Street (between Brighton Way and South Normandie Avenue), on the north side of West 170 th Street (between Brighton Way and South Normandie Avenue), on the west side of South Normandie Avenue (between West 169 th Street and West 170 th Street), and on the east side of Brighton Way (between West 169 th Street and West 170 th Street).

¹⁷ State of California, Department of Finance. (2023). *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023, Table 2: E-5 City/County Population and Housing Estimates*. Accessed May 2023.



Goal		Project Analysis
		Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169 th Street, just west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. Additionally, the Project includes railroad improvements on Normandie Avenue. Both ROW and Railroad improvements would upgrade existing infrastructure and increase mobility, reliability, and travel safety for people and goods.
Goal 3	Enhance the preservation, security, and resilience of the regional transportation system.	No Conflict. The Project includes railroad improvements on Normandie Avenue. These improvements would enhance the preservation, security, and resilience of the regional transportation system.
Goal 4	Increase person and goods movement and travel choices within the transportation system.	No Conflict. The Project includes sidewalk improvements, as described in Goal 2 above. The Project also proposes railroad track improvements along South Normandie Avenue, which include the following: <ul style="list-style-type: none"> • Removing the spur track, which enters the Project site. • Removing approximately 830 linear feet of railroad spur currently located along the Project site’s eastern boundary. • A new median both north and south of the track alignment, and • New warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks. • Refreshing railroad crossing pavement markings immediately north and south of the track alignment.
Goal 5	Reduce greenhouse gas emissions and improve air quality.	No Conflict. The Project site is in an urban area near existing transit routes and freeways. The Project’s location within an urbanized, walkable area would reduce trip lengths, which would reduce GHG and air quality emissions.
Goal 6	Support healthy and equitable communities	No Conflict. The Project does not exceed South Coast AQMD’s regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the South Coast AQMD’s localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.



Goal		Project Analysis
Goal 7	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Not Applicable. This is not a project-specific goal.
Goal 8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No Conflict. As mentioned previously, the Project would designate approximately 40 percent of the 559 parking stalls to be capable, ready, or equipped for EV Chargers. Each townhome unit would have one EV ready space within each garage. Additionally, a designated loading area at the apartment building along Normandie Avenue would be signed and distinguished (e.g., with paving and/or paint) so that it may be used as a pick-up and drop-off zone for ride-sharing services.
Goal 9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. The Project proposes various housing types that would provide diverse housing options and be served by public transit located within approximately 0.25 mile of the Project site. Existing GTrans bus stops are located less than 600 feet north of the Project site along 166 th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile south of the Project site, providing more access to public transit opportunities. The Project includes ROW improvements along 169 th Street, which would create a continuous pedestrian path and allow greater access to public transit opportunities. Further, the Project would provide new residents who sign a 12-month lease one free monthly Metro pass.
Goal 10	Promote conservation of natural and agricultural lands and restoration of habitats.	Not Applicable. The Project site is not located on agricultural lands and does not contain native habitat.

Source: Southern California Association of Governments. (2020). *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy*.

The SCAG RTP also outlines seven guiding principles which take the goals outlined above in **Table 4.5-4** and focuses them, creating a specific direction for plan investments. **Table 4.5-6: RTP/SCS Guiding Principles Analysis** evaluates the Project’s consistency with these guiding principles. As indicated in **Table 4.5-6**, the Project would not conflict with the RTP/SCS Guiding Principles adopted for the purpose of reducing GHG emissions. As such, Project impacts



concerning consistency with the RTP/SCS Guiding Principles would be less than significant, and no mitigation is required.

Table 4.5-6: RTP/SCS Guiding Principles Analysis

Guiding Principle		Project Analysis
Guiding Principle 1	Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	Not Applicable. The Project proposes residential development.
Guiding Principle 2	Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	No Conflict. The Project does not involve transportation funding. Notwithstanding, as mentioned above, the Project includes ROW improvements both offsite and along the Project frontage which would create a continuous pedestrian path and allow greater access to public transit opportunities. Additionally, the Project includes railroad improvements on Normandie Avenue, which would upgrade and preserve the existing rail line. For further discussion on railroad improvements, see Section 4.14: Transportation . Both ROW and Railroad improvements would improve mobility, accessibility, reliability and safety, and preserve the existing transportation system.
Guiding Principle 3	Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	No Conflict. The Project assures that land use and growth strategies recognize local input through the CEQA Notice of Preparation (NOP) process. As outlined in Section 4: Environmental Analysis , the Project received multiple public comments which have been addressed in various sections of this document. The Project would also promote sustainable transportation options by encouraging the use of existing public transit through the following features: <ul style="list-style-type: none"> ▪ The Project site would be located where multiple public transit opportunities are located. Public transit services are provided by GTrans, Torrance Transit and Metro Further, the Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities.



Guiding Principle		Project Analysis
		<ul style="list-style-type: none"> The NCSP allows new residents who sign a 12-month lease would be offered one free monthly Metro pass. <p>Further, the Project would support equitable and adaptable communities by offering various types of housing options which include studio, 1- and 2-bedroom apartments, townhomes, and affordable housing units. The variety of housing options would allow people of various incomes to reside within the City.</p>
Guiding Principle 4	Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	<p>No Conflict. As mentioned above, the Project would promote sustainable transportation options by encouraging the use of existing public transit through the following features:</p> <ul style="list-style-type: none"> The Project site would be located where multiple public transit opportunities are located. The NCSP allows new residents who sign a 12-month lease would be offered one free monthly Metro pass. <p>Collectively, these features would result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.</p>
Guiding Principle 5	Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions	Not Applicable. The Project proposes residential development.
Guiding Principle 6	Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	Not Applicable. This guiding principle refers to a SCAG responsibility and does not apply to the proposed Project.
Guiding Principle 7	Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	No Conflict. Analysis of the Project was conducted with the most current information and resources available at the time the NOP was released as required per CCR §15125.1(a).
Source: Southern California Association of Governments. (2020). <i>Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy</i> .		

CARB Scoping Plan Consistency

Pursuant to AB 32 requirements, CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which provides a range of GHG reduction actions. There were three previous Scoping



Plans, which focused on specific GHG reduction targets for industrial, energy, and transportation sectors — first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. The 2022 Scoping Plan, addressing recent legislation and direction from Governor Newsom, extends and expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. These measures build upon those identified in the Scoping Plan’s first update in 2013.

Table 4.5-7: CARB Scoping Plan Analysis identifies the key attributes for residential (and mixed-use) projects to qualitatively determine consistency with the Scoping Plan and evaluates the Project’s consistency with these attributes. As indicated in **Table 4.5-7**, the Project would be consistent with these key attributes, thus, would not conflict with the CARB Scoping Plan GHG reduction goals. As such, the Project would not conflict with the Scoping Plan. Project impacts would be less than significant, and no mitigation is required.

Table 4.5-7: CARB Scoping Plan Analysis

Priority Areas	Key Project Attributes	Project Analysis
Transportation and Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	No Conflict. The proposed Project would comply with the CALGreen Code for electric vehicle (EV) charging design. Compliance would provide 10 percent of parking stalls to be EV capable, 25 percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	No Conflict. The Project is proposed on an infill site that is entirely surrounded by existing urban uses. The Project proposes to redevelop an underutilized industrial property that is presently served by existing utilities and essential services; see Section 4.15: Utility and Services Systems and Section 4.11: Public Services , respectively. As such, the Project would limit urban sprawl.
	Does not result in the loss or conversion of natural and working lands.	No Conflict. The Project is proposed on a site that is currently occupied by industrial uses and devoid of natural or working lands. Therefore, no loss or conversion of such lands would occur.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre) or is in proximity to existing	No Conflict. The Project proposes 403 DU at a density of 77 DU/AC. The Project is proposed on an infill site and is accessible



Priority Areas	Key Project Attributes	Project Analysis
	<p>transit stops (within a half mile) or satisfies more detailed and stringent criteria specified in the region’s SCS.</p>	<p>to public transit via bus service provided within approximately 0.25 mile of the Project site. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing further access to public transit opportunities. The Project includes ROW improvements along 169th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. Further, the Project would provide new residents who sign a 12-month lease one free monthly Metro pass.</p>
	<p>Reduces parking requirements by:</p> <ul style="list-style-type: none"> ▪ Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or ▪ Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or ▪ For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. 	<p>No Conflict. The Project would include 1.2 parking spaces per apartment DU, which is less than Gardena Municipal Code requirements. Additionally, parking would be provided unbundled from apartment rents.</p>
	<p>At least 20 percent of units included are affordable to lower income residents.</p>	<p>Conflict. While the Project would not include 20 percent of units as affordable housing, the Project would include 5.0 percent (20DU) of units as affordable. This conflict is considered a less than significant impact given the Project complies with the City’s development standards and supports the goal of providing affordable housing.</p>
	<p>Results in no net loss of existing affordable units.</p>	<p>No Conflict. There are no existing affordable units on the Project site.</p>



Priority Areas	Key Project Attributes	Project Analysis
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	No Conflict. The proposed Project would meet the 2022 Title 24 Part 6 building code and Title 24 Part 11 (CalGreen) standards. In addition, the Project would be all electric, requiring no natural gas.
Sources: Refer to Exhibit 2-4 and Appendix 4.5-1 for assumptions used in this analysis.		

In summary, the Project would comply with GHG reduction policies, strategies, and regulations outlined in the AB 32 and SB 32 regulatory programs, the City of Gardena CAP, SCAG’s RTP/SCS, and the Scoping Plan. Therefore, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.5.7 CUMULATIVE IMPACTS

A single project’s emissions would not cause or exacerbate global climate change. Climate change is a global phenomenon and the significance of a project’s GHG emissions is inherently cumulative in nature. CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs from even relatively small (on a global basis) increases in GHG emissions. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and therefore significant. A cumulatively considerable impact is the impact of a project in addition to impacts of the related projects. However, in the case of global climate change, a project’s proximity to other GHG-generating activities is not directly relevant to the determination of global GHG cumulative impacts.

As presented in **Table 4.5-2**, the Project would result in a slight increase in GHG emissions as compared to the GHG emissions associated with the existing on-site land use. Because GHG emissions are considered cumulative in nature, the Project would not result in a significant cumulative impact concerning GHG emissions.

The Project would not conflict with the state’s ability to achieve the AB 32 and SB 32 GHG reduction targets and would not conflict with the City’s CAP. In addition, the Project would not conflict with the applicable GHG emissions reduction strategies in SCAG’s RTP/SCS.

As discussed above, the Project would not result in significant GHG impacts. Thus, the Project when combined with cumulative projects would not result in a significant cumulative impact concerning GHG emissions.



4.5.8 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning GHG emissions have been identified.

4.5.9 REFERENCES

California Air Resources Board. (2017). *California's 2017 Climate Change Scoping Plan*. Retrieved from: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed June 2023.

California Air Resources Board. (2022). *2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions*.

Intergovernmental Panel on Climate Change. (2013). *Carbon and Other Biogeochemical Cycles*. In: *Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Retrieved from: http://www.climatechange2013.org/images/report/WG1AR5_ALL_FINAL.pdf. Accessed June 2023.

Ramboll Americas Engineering Solutions, Inc. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project – Gardena, California*; see **Appendix 4.5-1: GHG Technical Report**.

Southern California Association of Governments. (2020). *The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*.

South Coast AQMD. (2008). *Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, Attachment E: "Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. Page 3-2.

State of California. *California Code of Regulations, Section 15064.4a*.

State of California, Department of Finance. (2023). *E-5 Population and Housing Estimates for Cities, Counties and the State – January 1, 2011-2023, Table 2: E-5 City/County Population and Housing Estimates*. Accessed May 2023.

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Retrieved from: <https://www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf>. Accessed June 2023.

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U.S. Environmental Protection Agency. (2023). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*. Retrieved from <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>. Accessed June 2023.

U.S. EPA. (2023). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021*.

U.S. EPA. (2010). *Methane and Nitrous Oxide Emission from Natural Sources*.

An architectural rendering of a modern multi-story apartment complex. The central courtyard features a rectangular swimming pool with a wooden deck, lounge chairs, and a small tree. The buildings have a mix of white and grey facades with large windows and balconies. In the foreground, there are several rooftop decks with wooden flooring and some greenery. The overall scene is bright and clear, suggesting a sunny day.

4.6 HAZARDS AND HAZARDOUS MATERIALS



4.6 HAZARDS AND HAZARDOUS MATERIALS

The purpose of this section is to describe the existing regulatory and environmental conditions related to hazards and hazardous materials, and wildfires, and evaluate potential impacts that could result from Project implementation. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impact.

Information concerning the Project site's southern portion (APN 6106-030-017) in this section is based primarily on data from the following resource:

- Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, Food & Beverage Processing Plant, 16911 South Normandie Avenue, Gardena, California*, January 7, 2021; see **Appendix 4.6-2: South Phase I ESA**.

Information concerning the Project site's northern portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016) in this section is based primarily on data from the following resources:

- Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, 16831 South Normandie Avenue, Gardena, California*, July 13, 2021; see **Appendix 4.6-1: North Phase I ESA**.
- Partner Engineering and Science, Inc., *Assessment Report 16829-16839 South Normandie Avenue, Gardena, California*, November 4, 2021; see **Appendix 4.6-3: Soil/Gas Phase II**.
- Partner Engineering and Science, Inc., *Phase II Subsurface Investigation Report 16829-16839 South Normandie Avenue, Gardena, California*, July 26, 2021; see **Appendix 4.6-4: Soil/Groundwater Phase II**.
- Hillman Consulting, *Opinion Letter: Light Industrial Property 16829-16839 South Normandie Avenue, Gardena, California*, July 26, 2021; see **Appendix 4.6-5: Opinion Letter**.
- Hillman Consulting, *Technical Memorandum Vapor Intrusion Risk Evaluation 16829-16839 South Normandie Avenue, Gardena, California*, August 11, 2023; see **Appendix 4.6-6: VIRE**.

It is noted, Kimley-Horn conducted third-party reviews on behalf of the City of Gardena ("City"), as listed below. The third-party reviews concluded the analyses meet the applicable provisions of Environmental Quality Act (CEQA) and the State CEQA Guidelines.

- Kimley-Horn and Associates, *Hazardous Materials Data for Normandie Crossing Project Peer Review*, Orange, California, March 15, 2023; see **Appendix 4.6-1**.
- Kimley-Horn and Associates, *Supplemental Hazardous Materials Data for Normandie Crossing Project Peer Review*, Orange, California, March 15, 2023; see **Appendix 4.6-3**.



- Kimley-Horn and Associates, *Vapor Intrusion Risk Evaluation for Normandie Crossing Project Peer Review*, Orange, California, September 7, 2023; see **Appendix 4.6-6**.

Due to multiple phases of due diligence and acquisitions, Phase I Environmental Site Assessments (Phase I ESAs) were completed separately for the Project site's northern portion (16831 South Normandie Avenue; see **Appendix 4.6-1**) and southern portion (16907-16911 South Normandie Avenue; see **Appendix 4.6-2**).

The Phase I ESA for the Project site's northern portion (see **Appendix 4.6-1**) identified the release of volatile organic compounds (VOCs) and petroleum hydrocarbons, thus, a Phase II ESA was recommended and performed. The Phase II consisted of two parts: a July 2021 assessment of soil, gas, and groundwater samples (see **Appendix 4.6-3**); and a November 2021 supplemental investigation of VOCs (see **Appendix 4.6-4**).

4.6.1 EXISTING SETTING

Site Reconnaissance

Methodology and Limiting Conditions

Partner Engineering and Science, Inc. (Partner) conducted a Phase I ESA for the Project site's northern and southern portions (see **Appendix 4.6-1** and **Appendix 4.6-2**, respectively). The assessments were performed in conformance with the ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments and included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) review of historical sources; 4) review of regulatory agency records; and 5) review of regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments, and building departments to determine any current and/or former hazardous substance usage, storage, and/or release of hazardous substances on the Project site. Additionally, Partner researched information on the presence of activity and use limitations (AULs) at these agencies. Specific limitations and exceptions to the ESAs are described below:

Interviews with past owners, operators and occupants were not reasonably ascertained and thus constitute a data gap. Based on information obtained from other historical sources, this data gap is not expected to alter the findings of this assessment.

Partner requested information relative to deed restrictions and environmental liens, a title search, and completion of the AAI User Questionnaire from the Report User. This information was not provided at the time of the assessment. Based on information obtained from other historical sources, this data gap is not expected to alter the findings of this assessment.

Partner was unable to determine the property use at five-year intervals, which constitutes a data gap. Except for property tax files and recorded land title records, which were not considered to



be sufficiently useful, Partner reviewed all standard historical sources and conducted appropriate interviews.

Partner submitted Freedom of Information Act (FOIA) requests to the Los Angeles County Department of Public Health for information pertaining to hazardous substances, underground storage tanks, releases, inspection records, etc. for the property and/or adjacent properties. As of January 7, 2021, this agency has not responded to Partner's request. Based on information obtained from other historical sources, this limitation is not expected to alter the overall findings of this assessment.

Current Use

The Project site is currently developed as an industrial park that encompasses land south of 169th Street and north of 170th Street. The Project site is fully developed with six industrial buildings: three light industrial buildings at the northern portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016); and three industrial/office buildings at the southern portion (APN 6106-030-017). In addition to the buildings, the Project site is also improved with asphalt-paved and unpaved parking areas.

The Project site's southern portion contains a vacant production building (16907 South Normandie Avenue), a vacant office building (16911 South Normandie Avenue), and a warehouse building (16911 South Normandie Avenue).

One of the three light industrial buildings at the Project site's northern portion contains approximately 9,324 SF of industrial floor area that is in a dilapidated condition and is therefore not being used or occupiable. The other light industrial buildings on the Project site's northern portion are currently occupied by Property Prep Services and leased out to general office and storage tenants. Onsite operations consist of the storage of power wash equipment that is used during the prep and cleaning of parking structures. The property has equipped with an aboveground clarifier that is used to separate sediment from dirty wash water that is brought in from offsite cleaning operations.

The production building, office building, and warehouse at the southern portion are currently unoccupied, with the exception of the warehouse building that is currently being cleared of storage. The property consists of one single-story production building with a mezzanine level, one single-story office building, and one single-story warehouse building. In addition to the current structures, the property is also improved with a railroad spur, loading docks, asphalt-paved parking areas, and drainage features.

Current Use of Adjacent Properties

Table 2-2: Surrounding Land Uses and Zoning in Section 2.0: Project Description, describes the land uses on properties adjoining the Project site that Partner observed during the vicinity reconnaissance.



General Site Characteristics

Solid Waste Disposal. Solid waste generated at the Project site is disposed of in commercial dumpsters located on the site. An independent solid waste disposal contractor, Waste Resources, removes solid waste from the site. According to property personnel, only household trash is collected in the onsite solid waste dumpsters. No evidence of illegal dumping of solid waste was observed during the Partner site reconnaissance.

Sewage Discharge and Disposal. Sanitary discharges from the site are directed into the municipal sanitary sewer system. The City and Los Angeles County Sanitation District serve uses in the vicinity of the Project site. No wastewater treatment facilities or septic systems were observed or reported on the Project site.

Additionally, the three light industrial buildings at the Project site's northern portion were equipped with an aboveground clarifier/water treatment system.

Surface Water Drainage. Stormwater is discharged from the Project site primarily by sheet flow action across the paved surfaces towards stormwater drains located throughout the site and public right-of-way. Stormwater collected in landscaped areas percolates into the soil with overflow spilling onto adjacent paved areas. The Project site is connected to a municipal owned and maintained stormwater system.

The property is not a designated wetland area, based on information obtained from the U.S. Fish and Wildlife Service. No surface impoundments, wetlands, natural catch basins, settling ponds, or lagoons are located on site. No drywells were identified on the Project site.

Source of Heating and Cooling. Heating and cooling systems as well as domestic hot water equipment are fueled by electricity and natural gas provided by Southern California Edison and Southern California Gas Company, respectively. Heating and cooling systems for existing buildings onsite mostly consist of roof-mounted HVAC units.

Wells and Cisterns. No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

Wastewater. The three industrial buildings at the Project site's northern portion are equipped with an above-ground clarifier/water treatment system. Domestic wastewater generated at the production building, office building, and warehouse (southern portion) is disposed by means of the sanitary sewer system. No industrial process is currently performed at the Project site.

Septic Systems. No septic systems were observed or reported on the Project site.



Potential Environmental Hazards

Hazardous Substances and Petroleum Products Used or Stored at the Site. Partner identified hazardous substances used, stored, and/or generated on the three light industrial buildings at the northern portion of the site, which are listed in **Table 4.6-1: Hazardous Substances and Petroleum Products Noted at Northern Portion of Project Site.** The materials were found to be properly labeled and stored at the time of the assessment, and there were no signs of leaks, stains, or spills. Secondary containment is not provided. Based on the nature of use, overall small quantities observed, and lack of violations, these materials are not expected to represent a recognized environmental concern (REC).

Table 4.6-1: Hazardous Substances and Petroleum Products Noted at Northern Portion of Project Site

Substance	Container Size	Location	Nature of Use	Disposal Method
Used Oil Filters	1 x 55-gallon drum	Warehouse area	Equipment maintenance	Transported offsite by Safety-Kleen monthly
Oil	2 x 55-gallon drum	Warehouse area	Equipment maintenance	N/A
Paints	Various 5-gallon cans	Warehouse area	Concrete striping	N/A
Dirty Wash Water	Two 250-gallon totes	Exterior storage area	Offsite concrete power washing	Onsite water treatment system

Source: Appendix 4.6-1.

No hazardous substances or petroleum products were observed at the southern portion during the site reconnaissance.

Aboveground and Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/USTs). No evidence of current or former ASTs or USTs were observed during the site reconnaissance for the northern portion.

In the southern portion, there are circular concrete pads on the exterior of the production building indicative of the use of former ASTs. According to a 1993 Equipment Plan of the packaging area, the property was equipped with one 20,000-gallon syrup AST, one 20,000-gallon fructose AST, one 10,000-gallon water supply AST, and one 10,000-gallon sugar AST. Based on the non-hazardous nature of contents, no RECs were identified in connection with the former ASTs. Additionally, a concrete cut at the exterior of the warehouse building appears to have been related to former USTs.

Evidence of Releases. Black surface staining near damaged concrete was observed in the southwest corner of the equipment storage yard at the site’s northern portion. According to the regulatory database report, four open-top poly drums of unidentified dark sludge/liquid were located near the southwest corner of the equipment storage yard during the fire department’s



routine inspection in 2020. A proper waste determination had reportedly not been made at the time; however, compliance was subsequently achieved in September 2020. The area of staining appeared to be primarily confined to the concrete surface with some minor impacts to surface soil in the areas of damaged concrete. Based on the limited extent of the staining, surficial nature, and proper offsite removal of the former drums, this area of black staining is considered de minimis and not a recognized environmental concern at this time.

No spills, stains, or other indications that a surficial release occurred in the southern portion were observed.

Polychlorinated biphenyls (PCBs). The on-site reconnaissance addressed indoor and outdoor transformers that may contain PCBs. Three modern-style pole-mounted transformers, one pad-mounted transformer, and four interior dry-type transformers were observed on the Project site. The transformers are not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformers. Based on the good condition of the equipment, the transformers are not expected to represent a recognized environmental concern.

Additionally, no other potential PCB-containing equipment (oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed during Partner's reconnaissance.

Strong, Pungent, or Noxious Odors. No strong, pungent, or noxious odors were evident at the Project site during the site reconnaissance.

Pools of Liquid. No pools of liquid were observed on the Project site during the site reconnaissance.

Drains, Sumps, and Clarifiers. The industrial buildings in the northern portion are equipped with an aboveground clarifier/water treatment system. This feature is within a concrete-bermed area with no indications of a release within containment. This feature is permitted with the Los Angeles Department of Public Works (LACDPW), and no significant violations or releases have been reported in connection with the feature. Based on the aboveground nature and regulatory status, the aboveground clarifier/water treatment system is not considered a REC. No other drains, other than those associated with stormwater removal, were observed on the northern portion during the site reconnaissance.

No clarifiers were observed during Partner's site reconnaissance at the southern portion; however regulatory records indicate clarifier and "interceptors" systems were historically located on the property.

One sump pump was observed next to the fire riser on the warehouse building's southern wall. Another sump pump was observed that is used for stormwater drainage. No hazardous substances or petroleum products were noted in the vicinity of the sump pumps. Based on the nature of use of the sump pumps, these units are not expected to represent a recognized



environmental concern. No other drains, other than those associated with stormwater removal, were observed on the Project site during the site reconnaissance.

Pits, Ponds, and Lagoons. No pits, ponds or lagoons were observed on the site.

Stressed Vegetation. No stressed vegetation was observed on the site.

Additional Potential Environmental Hazards. No additional environmental hazards, including landfill activities or radiological hazards, were observed at either the northern or southern portions.

Railroad and Utility Corridors, and Roads— A railroad spur diverges from the rail right-of-way at the property's southeast portion. The spur runs to the property's northwestern portion. This feature was investigated as part of the 2020 South Phase I; see **Appendix 4.6-2**. Hazardous substances potentially associated with railroad and utility corridors include heavy metals in ballast rock, lead (from wood preservatives), herbicides, PCBs, asbestos (from train disc brake pads), creosote (from railroad ties), arsenic (from railroad ties and some herbicides), and petroleum hydrocarbons. The assessment found no concentrations of these substances above regulatory thresholds and did not recommend further evaluation of the rail spur.

Non-ASTM Services

Asbestos Containing Materials (ACMs). Partner was not provided building plans or specifications for review, which may have been useful in determining areas likely to have used ACMs. However, based on the age of the buildings, there is a potential that ACMs are present.

Lead Based Paint (LBP). Based on the age of the buildings (pre-1978), there is a potential that LBP is present. Interior and exterior painted surfaces were observed in good condition and therefore not expected to represent a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated.

Radon. Radon sampling was not conducted as part of this assessment. Review of the US EPA Map of Radon Zones places the property in Zone 2 (moderate potential for elevated radon levels). Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

Lead in Drinking Water. According to available information, Golden State Water Company serves the Project site. Golden State Water Company sources are a blend of groundwater pumped from the West Coast and Central Groundwater Basins and imported water from the Colorado River Aqueduct and the State Water Project. According to Golden State Water Company 2019 Annual Water Quality Report, water supplied to the site complies with all federal and state regulations pertaining to drinking water standards, including lead and copper.



Mold. Partner inspected accessible interior areas of the buildings for significant evidence of mold growth (exceptions detailed in Section 1.5 of **Appendix 4.6-1** and **Appendix 4.6-2**). No obvious indications of water damage or mold growth were observed during Partner’s site reconnaissance.

Adjacent Property Reconnaissance. No RECs were identified on the adjacent properties during the site reconnaissance, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

Historical Information

Research was conducted during the Phase I ESAs to identify the likelihood of past uses having led to RECs in connection with the Project site. Standard historical sources, including fire insurance maps, city directories, historical topographic maps, and historical aerial photographs, have been reviewed to document the Project site’s past uses, as far back as it can be shown that the Project site contained structures; or from the time the Project site was first used for residential, agricultural, commercial, industrial, or governmental purposes. The results of the research are presented below.

Northern Portion of Project Site. According to available historical sources, the site was formerly occupied by a rural residence from at least 1928 until at least 1952. The property appears to have been occupied by industrial operations since construction of the first building in 1957. One industrial building was developed in 1957; the second was developed in 1963; and the third industrial building was developed by 1976. The three light industrial buildings have been occupied by various light-industrial tenants since initial development in 1957. These tenants have included two machine shops, an auto body repair operation, an engine repair business (FM Engine), a cabinet maker, and several manufacturing entities, all operations that would have used or stored hazardous substances. There were RECs and “Environmental Issues” that were identified during the Phase I ESA; see **Appendix 4.6-1**.

Recognized Environmental Conditions

Several of the manufacturing tenant listings were prior to 1980, thus, there is no documentation pertaining to historical hazardous substance use, storage, or disposal practices. Additionally, several paint booths were historically identified in connection with former tenants Avenue Auto Body and KS Custom Cabinets, which confirms the historical onsite usage of solvents. Based on the plan to redevelop this site with a sensitive receptor (i.e., residential development), the long-term duration of use/occupancy by businesses that used, stored, and disposed of hazardous substances (60+ years), and lack of any subsurface data, the long-term light-industrial usage of the Project site is considered to be a REC.



Environmental Issues

According to California Division of Oil, Gas and Geothermal Resources (CalGEM), no oil or gas wells are located on or immediately adjacent to the site. The closest well was identified to be located approximately 480 feet south of the site and is reported as "abandoned."

As previously addressed, due to the age of the buildings, there is a potential that ACMs and/or lead-based paint (LBP) are present. Readily visible suspect ACMs and painted surfaces were observed in good condition. The identified suspect ACMs and LBPs would need to be sampled to confirm the presence or absence of asbestos or lead prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

Southern Portion of Project Site. According to available historical sources, the southern portion is shown with no structural improvements as early as 1896. In 1928 one residential and one ancillary structure were constructed, and the remainder of the property was in agricultural use from 1928 to 1947. In 1952 the industrial building and one residence were developed. In 1953 and 1967 the remaining industrial structures and a rail spur running into the northwestern building were developed. Former on-site operations included office activities, packaging and warehousing operations, and manufacturing of fruit bases for use in preparation of yogurt, ice creams, and pies. Various tenants have occupied the site from 1928 through 2019. There were no RECs or Controlled Recognized Environmental Condition (CRECs) identified, but there were Historical Recognized Environmental Conditions (HRECs) and "Environmental Issues" that were identified during the Phase I ESA and are described below:

Historical Recognized Environmental Conditions

The property was formerly equipped with one 10,000-gallon diesel UST and one 2,500-gallon diesel UST along the northern exterior of the warehouse building. The property also historically contained one 550-gallon fuel UST on the southern exterior of the production building. It was determined that impacted soils had been successfully removed and perched ground water had not been impacted. Regulatory closure was issued by the Los Angeles County Department of Public Works on November 2, 1989 for the 10,000-gallon diesel UST and 2,500-gallon diesel UST and on July 28, 1994 for the 550-gallon fuel UST.

Based on the removal of the USTs, the removal of impacted soils, and regulatory closures, the releases at the former USTs on the property represent an HREC and no further investigation is considered necessary; see **Appendix 4.6-1**.

Environmental Issues

Several additional areas of potential environmental concern were identified in connection with the historical operations at the Project site including the following: a railroad spur, washout area, chemical storage area, former clarifier, storage yard, testing laboratory, maintenance area, and



former ASTs and refrigerant system. Additionally, due to the age of the buildings, there is a potential that ACMs and/or LBP are present.

Records review

A database search report was obtained from Environmental Data Resources, Inc. (EDR). The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. The searches were performed according to ASTM standards for Phase I ESA database searches.

The Project site was identified in various databases in the regulatory database report searched by EDR. The site is not included on the list of hazardous materials sites compiled pursuant to Government Code §659621.5.1. Therefore, no further analysis is required.

The properties adjacent to the north, south (southern portion of Project site), and east were identified in various databases in the regulatory database report searched by EDR; see **Appendix 4.6-2** for the full database report.

Phase II Subsurface Investigation

There were no RECs or Controlled Recognized Environmental Condition (CRECs) identified in the Phase I performed for the Project site's southern portion, and the Historical Recognized Environmental Conditions (HRECs) and "Environmental Issues" that were identified during the Phase I ESA for the Project site's southern portion did not necessitate a Phase II investigation. Therefore, the discussion below focuses on the Project site's northern portion.

Northern Portion of the Project Site. Following the Phase I ESA, a Phase II Investigation was performed for the northern portion of the Project site to evaluate the potential impact of petroleum hydrocarbons and VOCs to soil gas, soil, and/or groundwater as a consequence of a release or releases from the current and/or former on-site industrial activities. The Phase II investigation included observations of site conditions and laboratory analysis of soil, groundwater, and soil gas samples taken at the Project site. Soil samples were analyzed for TPH-cc, PAHs, and VOCs, groundwater samples were analyzed for PAHs and VOCs, and soil gas samples were analyzed for VOCs. Results from soil sampling indicated various VOC's, PAHs, DRO and ORO were detected but did not exceed the respective regulatory thresholds for residential uses. Results from groundwater samples indicated that various VOC's and PAH naphthalene were detected, but also did not exceed the respective regulatory thresholds.

Results from the soil gas sampling indicated several VOCs including Benzene, ethylbenzene, methylene chloride, tetrachloroethene -PCE, and trichloroethene – TCE exceeded residential screening levels, and some exceeded commercial screening levels. The Phase II Investigation recommended conducting post-grading soil gas sampling to confirm whether soil gas concentrations have been reduced to acceptable concentrations.



A Vapor Intrusion Risk Evaluation (VIRE) was conducted in September 2022 and updated in August 2023. The VIRE's purpose was to assess whether the presence of VOCs detected in soil gas under the Project site area are likely to exceed levels considered acceptable to California health and environmental protection agencies. The VIRE evaluated the potential for VOC vapor intrusion exposure under for the proposed townhomes and apartments. The cancer risk estimated to result from unmitigated vapor intrusion at the apartment buildings was below the DTSC threshold. However, the townhomes were estimated to have estimated cancer risks exceeding the DTSC threshold. Therefore, the VIRE recommends that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any townhome and that parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site.

Proximity to Schools

There are no schools located within 0.25 mile of the Project site. The school nearest the Project site is Peary Middle School, located approximately 0.4 mile north of the Project site, at 1415 West Gardena Boulevard.

Proximity to Airports

The airport nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field, located approximately 3.4 miles north of the Project site. Review of the Hawthorne Airport's Airport Influence Area Map¹ indicates the Project site is outside of the Airport Influence Area boundaries. Therefore, no further analysis concerning this Airport is warranted. Additionally, there are no other airports or airstrips within 2.0 miles of the Project site.

Disaster and Evacuation Routes

Disaster routes are transportation routes, such as freeway, highway, or arterial routes, which are pre-identified for use during times of crisis.² These routes are used to bring in emergency personnel, equipment, and supplies to impacted areas, to save lives, protect property, and minimize environmental impacts. During a disaster, these routes have priority for clearing, repairing, and restoration over all other roads. The County states that "Disaster Routes are not Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area." Evacuation routes depend on the nature and location of the emergency or disaster. The County designates Artesia Boulevard to the south and I-110 to the east as disaster routes.³ The City does not designate disaster or evacuation routes.

¹ Los Angeles County Dept. of Regional Planning. (2003). *Hawthorne Airport Airport Influence Area*. Retrieved from http://planning.lacounty.gov/assets/upl/project/aluc_airport-hawthorne.pdf.

² Los Angeles County Dept. of Regional Planning. (2008). *Disaster Routes with Road Districts: South Los Angeles County*. https://pw.lacounty.gov/dsg/DisasterRoutes/map/disaster_rdm-South.pdf

³ Ibid.



Wildfires

The California Department of Forestry and Fire Protection (CalFire) maps identify fire hazard severity zones in state and local responsibility areas for fire protection. The Project site is not within an area designated as a very high fire hazard severity area.⁴

4.6.2 REGULATORY SETTING

See **Section 4.8: Hydrology and Water Quality**, for regulations pertaining to flood hazards and **Section 4.5: Geology and Soils**, for regulations pertaining to geology- and soils-related hazards.

Federal

The management of hazardous materials and hazardous wastes is regulated at federal, state, and local levels, including, among others, through programs administered by the U.S. EPA; agencies within the California Environmental Protection Agency (CalEPA), such as the DTSC; federal and state occupational safety agencies; and Los Angeles County Division of Environmental Health.

At the federal level, the U.S. EPA is the principal regulatory agency, while at the State level, DTSC is the primary agency governing the storage, transportation, and disposal of hazardous wastes. The Regional Water Quality Control Board (RWQCB) has jurisdiction over discharges into waters of the State. The federal OSHA and the California Occupational Safety and Health Administration (Cal/OSHA) regulate many aspects of worker safety.

Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act of 1976 and Resource Conservation and Recovery Act (RCRA) established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle to grave” system of regulating hazardous wastes.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law (U.S. Code Title 42, Chapter 103) provides broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be

⁴ CalFire. (2022). FHSZ Viewer. <https://egis.fire.ca.gov/FHSZ/>



identified. CERCLA also enables the revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulation [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and the National Priorities List

The U.S. EPA also maintains the Comprehensive Environmental Response Compensation (CERCLIS) and Liability Information System list. This list contains sites that are either proposed to be or on the National Priorities List (NPL), as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The NPL is a list of the worst hazardous waste sites that have been identified by Superfund.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted to inform communities and residents of chemical hazards in their area. Businesses are required to report the locations and quantities of chemicals stored onsite to both State and local agencies. EPCRA requires the U.S. EPA to maintain and publish a digital database list of toxic chemical releases and other waste management activities reported by certain industry groups and Federal facilities. This database, known as the Toxic Release Inventory, gives the community more power to hold companies accountable for their chemical management.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (DOT) receives authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act, as amended and codified (49 U.S.C. 5101 et seq.). The DOT is the primary regulatory authority for the interstate transport of hazardous materials and establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing).

California Vehicle Code §31303 states that any hazardous material being moved from one location to another must use the route with the least travel time. This, in practice, means major roads and highways, although secondary roads are permitted to be used for local delivery. These policies are enforced by both the California Highway Patrol and the California Department of Transportation (Caltrans).

Clean Water Act/Spill Prevention Control and Countermeasure (SPCC) Rule

The Clean Water Act (CWA) (33 U.S.C. §1251 et seq., formerly the federal Water Pollution Control Act of 1972), was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA requires states to set standards to



protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). In California, NPDES permitting authority is delegated to, and administered by, the nine RWQCBs. The Project is within the Los Angeles RWQCB's jurisdiction.

Clean Water Act Section 402 authorizes the California State Water Resources Control Board to issue an NPDES General Construction Storm Water Permit, referred to as the "Construction Stormwater General Permit." Construction activities can comply with and be covered under the Construction Stormwater General Permit provided that they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that would prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all BMPs.

NPDES regulations are administered by the RWQCB. Projects that disturb one or more acres are required to obtain NPDES coverage under the Construction Stormwater General Permits.

Occupational Safety and Health Administration (OSHA)

Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. To establish standards for workplace health and safety, OSHA also created the National Institute for Occupational Safety and Health as the research institution for OSHA. The Administration is a division of the U.S. Department of Labor that oversees the administration of OSHA and enforces standards in all states. OSHA standards are listed in Title 29 CFR Part 1910.

OSHA's Hazardous Waste Operations and Emergency Response Standard apply to five groups of employers and their employees. This includes any employees who are exposed or potentially exposed to hazardous substances (including hazardous waste) and who are engaged in clean-up operations; corrective actions; voluntary clean-up operations; operations involving hazardous wastes at treatment, storage, and disposal facilities; and emergency response operations.



State

California Environmental Protection Agency (CalEPA)

CalEPA has jurisdiction over hazardous materials and wastes at the State level. DTSC is the department of CalEPA responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and regulate a larger number of chemicals. Hazardous wastes regulated by California but not by the U.S. EPA are called "non-RCRA hazardous wastes." Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code §65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the SWRCB as having underground storage tank leaks and have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

Enforcement of directives from DTSC is handled at the local level, in this case the Los Angeles County Division of Environmental Health. The RWQCB also has the authority to implement regulations regarding the management of soil and groundwater investigation.

California Fire Code

California Code of Regulations, Title 24, also known as the California Building Standards Code, contains the California Fire Code (CFC), included as Title 24, Part 9. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State hazardous waste management program, which is similar to but more stringent than the federal RCRA program. The Act is implemented by regulations contained in CCR Title 26, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that



accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program Elements consolidated under the Unified Program are Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (known as Tiered Permitting); Above ground Petroleum Storage Tank SPCC; Hazardous Materials Release Response Plans and Inventory Program (a.k.a. Hazardous Materials Disclosure or “Community-Right-To-Know”); California Accidental Release Prevention Program (Cal ARP); Underground Storage Tank (UST) Program; and Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA. The CUPA designated for Los Angeles County is the Los Angeles County Fire Department (LACFD) – Health Hazardous Materials Division.

Department of Toxic Substance Control

DTSC is a department of CalEPA and is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code §65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the SWRCB as having UST leaks and have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

California Office of Emergency Services (OES)

To protect the public health and safety and the environment, the California OES is responsible for establishing and managing statewide standards for business and area plans relating to the handling and release or threatened release of hazardous materials. Basic information on hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and the health risks) needs to be available to firefighters, public safety officers, and regulatory



agencies. The information must be included in these institutions' business plans to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of these materials into the workplace and environment.

These regulations are covered under California Health and Safety Code Chapter 6.95 Article 1 – Hazardous Materials Release Response and Inventory Program (§§25500 to 25520), Article 2 – Hazardous Materials Management (§§25531 to 25543.3).

CCR Title 19, Division 2, Chapter 4, Article 4 (Minimum Standards for Business Plans) establishes minimum statewide standards for Hazardous Materials Business Plans (HMBP). These plans shall include the following: (1) a hazardous material inventory in accordance with §§2729.2 to 2729.7; (2) emergency response plans and procedures in accordance with §2731; and (3) training program information in accordance with §2732. Business plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Each business shall prepare a HMBP if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following: 500 pounds of a solid substance, 55 gallons of a liquid, 200 cubic feet of compressed gas, a hazardous compressed gas in any amount, or hazardous waste in any quantity.

California Occupational Safety and Health Administration

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than Federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR §§337-340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

In addition, Cal/OSHA regulates medical/infectious waste, including management of sharps, requirements for containers that hold or store medical/infectious waste, labeling of medical/infectious waste bags/containers, and employee training.

2022 California Fire Code

CCR Title 24, Part 9 (2022 California Fire Code) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of WUI areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023). The California Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous



materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises.

Los Angeles County adopted the 2022 California Fire Code with certain amendments, additions, and deletions, as Los Angeles County Code Title 32 (Los Angeles County Fire Code).

Regional

County Department of Public Health, Division of Environmental Health, Emergency Response Team

The Los Angeles County Emergency Preparedness and Response Unit ensures that the Los Angeles County Division of Environmental Health is able to protect the public from health hazards that occur after emergencies or disasters. The agency develops plans and establishes procedures to coordinate responses with partner agencies. The agency provides training and conducts exercises to create a workforce that is able to manage the health effects of any emergency.

County Fire Department Hazardous Materials Response Team

The LACFD Health Hazardous Materials Division is the lead agency (CUPA) for hazardous materials within Los Angeles County. Any business that handles a hazardous material or hazardous waste of quantities at any one time during a year equal to or greater than a total volume of 55 gallons, a total weight of 500 pounds, or a total volume of 200 cubic feet of a compressed gas is a hazardous materials handler and must report Owner/Operator, Business Activities, Inventory, Site Map, and Emergency Response and Contingency Plan and Employee Training Plan information in the California Environmental Reporting System.

Local

City of Gardena General Plan

The Project relevant General Plan policy concerning hazards and hazardous materials is addressed below.

- **Goal CN 2:** Conserve and protect groundwater supply and water resources.
 - **Policy CN 2.6:** Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

City of Gardena Municipal Code

The City adopted the Los Angeles County Fire Code with certain amendments, additions, and deletions, as Gardena Municipal Code (GMC) Chapter 8.08.010: Adoption of the County Fire Code. The City currently operates under the 2022 Los Angeles County Fire Code.



Pursuant to GMC Chapter 8.08.030: Fire Fighting, the City's Emergency Medical Services' transferred responsibility of providing fire protection, EMS services, and protection from hazardous materials in the City to the LACFD. The Los Angeles County Fire Code provides standards to ensure that the use, handling, storage, and transportation of hazardous materials comply with all applicable State laws (including but not limited to, California Government Code §65850.2 and California Health and Safety Code §25505 et seq.) and that appropriate information is reported to the County of Los Angeles, as the regulatory authority. This section of the Fire Code includes reporting requirements; standards regarding underground and aboveground storage of hazardous materials; and standards for new development.

City of Gardena 2017 Emergency Operations Plan

The purpose of the Emergency Operations Plan is to provide guidance for the City's response to emergency situations from natural disasters, technological incidents, and National security emergencies. The Emergency Operations Plan describes procedures for the effective and efficient allocation response to a hazardous materials emergency. It establishes an emergency organization, assigns tasks, specifies policy and general procedures, and provides coordination of planning for all phases of emergency planning for a hazardous materials emergency.

4.6.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines *Appendix G, Environmental Checklist Form*, includes questions concerning hazards and hazardous materials, and wildfires. The issues presented in the Environmental Checklist have been used as significance criteria in this section. Accordingly, the Project could have a significant effect on the environment if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (see **Section 7.0: Effects Found Not To Be Significant**);
- 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 (see **Impact 4.7-1**);
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (see **Section 7.0: Effects Found Not To Be Significant**);
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment (see **Section 7.0: Effects Found Not To Be Significant**);
- 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 (see **Section 7.0: Effects Found Not To Be Significant**);

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (see **Section 7.0: Effects Found Not To Be Significant**); or
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (see **Section 7.0: Effects Found Not To Be Significant**).

4.6.4 IMPACTS AND MITIGATION MEASURES

Impact 4.6-1:

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

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction

Project construction would include demolition of all structures and complete over-excavation and re-compaction of soils, which could be contaminated.

The existing buildings were noted as a REC due to potential ACM and LBP. Demolition of the onsite buildings has the potential to cause airborne asbestos and LBP concentrations that would exceed federal and State thresholds and may pose an exposure risk for construction workers. Therefore, ACM and LBP would be removed or stabilized prior to demolition. Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite buildings. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of asbestos, and COA HAZ-2 includes measures to safely demolish structures containing potential LBP, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition. Therefore, following compliance with COA HAZ-1 and COA HAZ-2, the potential presences of these materials would not result in a significant hazard to the public through reasonably foreseeable upset and accident conditions.

As previously addressed, the Phase I ESAs identified various onsite RECs associated with past uses of the Project site. Additionally, there could be other undocumented contamination associated with previous uses on the Project site. Therefore, Project demolition and construction activities could 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. MM HAZ-1 requires a construction management plan that includes provisions for responding to the disturbance of undocumented contamination. Responsibility for responding to



the discovery of undocumented contamination is delegated to the CUPA, LACFD. If soil, groundwater, or other environmental media with suspected contamination is encountered unexpectedly during construction (for example, identified by odor or visual staining, or by unearthing any underground storage tanks, abandoned drums, or other hazardous materials and wastes), work would immediately cease in the vicinity of the suspect materials. The area would then be secured as necessary, and all appropriate measures would be taken to protect human health and the environment. Appropriate measures include notifying regulatory agencies and complying with the various agencies' laws, regulations, and policies. MM HAZ-1 requires that the Applicant and its contractors would work with these agencies should undocumented contamination be encountered during construction. These provisions would minimize the potential for hazardous materials to be released into the environment. With implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, impacts would be less than significant in this regard.

Operations

The Phase II Investigation identified PCE concentrations that exceed DTSC screening levels for residential applications and recommended conducting a VIRE to determine a possible vapor intrusion threat to future residents on the Project site. The VIRE evaluated the potential for VOC vapor intrusion exposure under for the townhomes and apartments based on the specifications outlined in the California DTSC's February 2023 Draft Supplemental Guidance. The cancer risk estimated to result from unmitigated vapor intrusion at the apartment buildings was below the DTSC. However, the townhomes were estimated to have estimated cancer risks exceeding the DTSC threshold. Therefore, the VIRE recommends that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any townhome and that parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. MM HAZ-2 incorporates the VIRE's recommendations and requires that an engineered vapor measure (such as an impermeable membrane) be included in the proposed townhome design and proper ventilation be included in the apartment building parking structure design. With implementation of MM HAZ-2, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving soil and groundwater contamination. With mitigation, impacts would be less than significant.

As previously noted, South Normandie Avenue contains railroad tracks along the roadway's western boundary, near West 170th Street, but these tracks cross onto the roadway's eastern boundary near Asher Court. During operations, trains could derail, and cause potential upset and accident conditions. To assess the Project's potential to increase transportation hazards associated with the existing railroad facilities, the City and Applicant consulted with the California Public Utilities Commission (CPUC) and Union Pacific Railroad (UPRR). Through the consultation process, various railroad improvements were identified as being required along South Normandie Avenue pursuant to current CPUC standards and UPRR guidelines. As such, the Project proposes railroad track improvements along South Normandie Avenue, which would be designed pursuant to current CPUC standards and UPRR guidelines, and include the following:



- Removing approximately 170 linear feet of railroad spur track which enters the Project site and formerly served the southernmost industrial building (16911 South Normandie Avenue).
- Removing approximately 830 linear feet of railroad spur track which enters the Project site and formerly served the central industrial building (16907 South Normandie Avenue).
- Constructing a new median both north and south of the track alignment.
- Installing new warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks.
- Refreshing railroad crossing pavement markings immediately north and south of the track alignment.

These improvements would minimize potential impacts from derailments by bringing the crossing up to current CPUC standards and UPRR guidelines. Furthermore, according to the Federal Railroad Administration crossing report (FRA 2023), the maximum speed of trains at this crossing is 10 miles per hour, thus, any derailment would be at very low speeds.

Project operations would involve the use of typical hazardous materials/chemicals associated with residential uses such household cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. Any routine transport, use, and disposal of these materials during Project operations must adhere to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Further, hazardous materials/chemicals such as household cleaners, paints, solvents, and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, Project operations would not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant following compliance with the established regulatory framework.

Conditions of Approval

COA HAZ-1 Asbestos Survey. Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations.

COA HAZ-2 If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. A portable, field X-ray fluorescence (XRF) analyzer shall be used to identify the locations of potential lead paint, and test accessible painted surfaces. The qualified Environmental Professional shall identify the likelihood that lead is present in



concentrations greater than 1.0 milligrams per square centimeter (mg/cm²) in/on readily accessible painted surfaces of the buildings.

If lead-based paint is found, a qualified Lead Specialist shall complete abatement prior to any activities that would create lead dust or fume hazard. Potential methods to reduce lead dust and waste during removal include wet scraping, wet planning, use of electric heat guns, chemical stripping, and use of local High-Efficiency Particulate Air (HEPA) exhaust systems. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, §1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Engineer.

Mitigation Measures

MM HAZ-1 Construction Management Plan. Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.

MM HAZ-2 Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. The impermeable vapor membrane shall not underlay non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.

4.6.5 CUMULATIVE IMPACTS

For purposes of the hazardous materials impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. As indicated in **Table 3-1** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are eight related projects within the geographic context for the cumulative hazardous materials analysis (i.e., 1.0-mile radius):

- Related Project No. 2⁵ (a condominium development approximately 720 feet to the northeast);

⁵ This related project is approximately 720 feet northeast of Project site. This is second nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review anticipated expiration November 2023. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023)



- Related Project No. 3⁶ (a small lot subdivision development approximately 400 feet to the northeast);
- Related Project No. 9 (a residential development approximately 0.90 mile to the northeast);
- Related Project No. 12 (a self-storage development 0.30 mile to the south);
- Related Project No. 15 (a residential project 0.50 mile to the southwest);
- Related Project No. 16 (a mixed-use development 0.30 mile to the north);
- Related Project No. 22 (a townhome development 0.70 mile to the north); and
- Related Project No. 23 (multi-family residential development 0.60 mile to the southwest).

As concluded above, Project construction could encounter undocumented LBP, ACMs, and other hazardous materials and hazardous wastes. HAZ COA-1 and HAZ COA-2 would be required to reduce potential impacts related to ACMs and LBP. Preparation of an Environmental Management System, demolition plan and construction management plan (HAZ MM-1) would be required to reduce impacts related to a release of hazardous materials into the environment during construction or operations.

As addressed in this EIR section, the Phase I and Phase II ESA identified various RECs in association with past uses within the Project site. The VIRE found an exceedance of DTSC cancer risk for the townhome component and recommended installing a vapor intrusion barrier and ventilating the apartment parking structure. Therefore, the Project requires compliance with MM HAZ-2 to provide an engineered vapor barrier (such as an impermeable membrane) to reduce impacts to a less than significant level.

Cumulative impacts related to hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. The potential for cumulative impacts to occur is limited since the impacts from onsite hazardous materials use are site-specific. The EIR evaluates environmental hazards in connection with the Project site and surrounding area. Regarding the offsite environmental hazards, the database search documents the findings of various governmental database searches regarding properties with known or suspected releases of hazardous materials within a search radius of up to 1.0 mile from the Project site and serves as the basis for defining the cumulative impacts study area.

Although some of the related projects have potential site-specific impacts associated with hazardous materials, it is expected that future development would comply with all federal, state, and local statutes and regulations applicable to hazardous materials.

⁶ This related project is approximately 400 feet northeast of Project site. Nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review has expired. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023).



With implementation of the COAs and MMs, the Project would result in a less than significant impact concerning hazardous materials. Therefore, when combined with cumulative development, the Project's hazardous materials-related impacts would not be cumulatively considerable.

4.6.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning hazards and hazardous materials would occur.

4.6.7 REFERENCES

City of Gardena (2006). *Gardena General Plan, updated 2022*. Gardena, CA: City of Gardena.

City of Gardena, *Gardena Municipal Code* (City Municipal Code Chapter 17). Accessed August 27, 2020. Gardena, CA:
<https://www.codepublishing.com/CA/Gardena/#!/Gardena08/Gardena0808.html#8.08>.

Hillman Consulting, *Opinion Letter: Light Industrial Property 16829-16839 South Normandie Avenue*, Gardena, California, July 26, 2021 (Opinion Letter); see **Appendix 4.6-5: North Opinion Letter**.

Hillman Consulting, *Technical Memorandum Vapor Intrusion Risk Evaluation 16829-16839 South Normandie Avenue*, Gardena, California, August 11, 2023 (VIRE); see **Appendix 4.6-6: North VIRE**.

Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, 16831 South Normandie Avenue*, Gardena, California, July 13, 2021 (North Phase I); see **Appendix 4.6-1**.

Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, Food & Beverage Processing Plant, 16911 South Normandie Avenue*, Gardena, California, January 7, 2021 (South Phase I); see **Appendix 4.6-2**.

Partner Engineering and Science, Inc., *Assessment Report 16829-16839 South Normandie Avenue*, Gardena, California, November 4, 2021 (Soil/Gas Phase II); see **Appendix 4.6-3**

Partner Engineering and Science, Inc., *Phase II Subsurface Investigation Report 16829-16839 South Normandie Avenue*, Gardena, California, July 26, 2021 (Soil/Groundwater Phase II); see **Appendix 4.6-4**.



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An architectural rendering of a modern multi-story apartment complex. The central focus is a courtyard featuring a rectangular swimming pool with a wooden deck, lounge chairs, and a small table. The pool is enclosed by a glass railing. Surrounding the pool are several balconies with glass railings and small trees. In the foreground, there are rooftop terraces with wooden decking and some furniture. The overall design is contemporary with a mix of light and dark tones.

4.7 HYDROLOGY AND WATER QUALITY



4.7 HYDROLOGY AND WATER QUALITY

This section analyzes the Project's potential to violate water quality standards or waste discharge requirements or alter the existing drainage pattern of the site. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant impacts.

Information in this section is based primarily on hydrology and water quality data provided in **Appendix 4.7-1: Water Resources Technical Report**. Additional resource information was obtained from available public resources, including among others, Los Angeles County Department of Public Works Well Finder website and historical well data.

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Water Resources Technical Report; see **Appendix 4.7-1**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.7.1 EXISTING SETTING

Regional Setting

Surface Water Hydrology

The Project site is within the Dominguez Watershed, which covers approximately 133 square miles and is largely built out. The watershed's land uses generally consist of commercial, industrial, and residential uses.

Surface Water Quality

The Project site is within Los Angeles Regional Water Quality Control Board (LARWQCB) jurisdiction. The LARWQCB regulates water quality within the Dominguez Watershed. The LARWQCB lists the Dominguez Watershed on the 303(d) list¹ for impaired water bodies which requires the development of a Total Maximum Daily Load (TDML). A TDML is an estimate of the daily load of pollutants that a water body may receive from point sources, non-point sources, and natural background conditions, without exceeding its water quality standard. **Table 4.7-2: Dominguez Channel List of 303(d) Impairments and TDML's** summarizes existing 303(d) Impairments and Total Maximum Daily Load (TMDLs) in the Dominguez Channel watershed.

¹ Under §303(d) of the CWA, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired.



Table 4.7-1: Dominguez Channel List of 303(d) Impairments and TDML's

Water Body	303(d) Impairment & TDMLs
Dominguez Channel (lined portion above Vermont Ave)	Copper, Indicator Bacteria (<i>303d only</i>), Lead, Toxicity, Zinc
Dominguez Channel (unlined portion below Vermont Ave)	Benthic Community Effects, Benzo(a)anthracene, Benzo(a)pyrene(3,4-Benzopyrene-7-d), Chlordane (tissue), Chrysene (C1-C4), Copper, DDT (tissue & sediment), Dieldrin (tissue), Indicator Bacteria (<i>303d only</i>), Lead, PCBs (Polychlorinated biphenyls), Phenanthrene, Pyrene, Toxicity
Los Angeles Harbor – Consolidated Slip	2-Methylnaphthalene, Benthic Community Effects, Benzo(a)anthracene, Benzo(a)pyrene(3,4-Benzopyrene-7-d), Cadmium (sediment), Chlordane (tissue & sediment), Chromium, Chrysene (C1-C4), Copper (sediment), DDT (tissue & sediment), Dieldrin, Lead (sediment), Mercury (sediment), PCBs (Polychlorinated biphenyls), Phenanthrene, Pyrene, Toxaphene (tissue), Toxicity, Zinc (sediment)
Los Angeles/Long Beach Inner Harbor	Beach Closures (<i>TMDL only</i>), Benthic Community Effects, Benzo(a)anthracene, Benzo(a)pyrene(3,4-Benzopyrene-7-d), Chrysene (C1-C4), Copper, DDT (Dichlorodiphenyltrichloroethane), PCBs (Polychlorinated biphenyls), Toxicity, Zinc (sediment)
Los Angeles/Long Beach Outer Harbor (inside breakwater)	DDT (Dichlorodiphenyltrichloroethane), PCBs (Polychlorinated biphenyls), Toxicity
San Pedro Bay Near/Offshore Zones	Chlordane, PCBs (Polychlorinated biphenyls), Total DDT (sum of 4,4' and 2,4'-isomers of DDT, DDE, and DDD), Toxicity

Source: **Appendix 4.7-1**, Table 4

Groundwater

The Project site and City overlie the Los Angeles Coastal Plain Groundwater Basin (Coastal Plain Basin), which consists of four major subbasins: Hollywood, Santa Monica, Central, and West Coast. The Project site is within the West Coast Subbasin, which covers approximately 160 square miles of the Coastal Plain Basin. The West Coast Subbasin was adjudicated in 1961, with the California Department of Water Resources serving as Watermaster and maintaining Sustainable Groundwater Management Act (SGMA) reporting requirements. The West Coast Basin Judgment (West Judgment) limits the amount of groundwater each party can extract annually from the West Coast [Sub]Basin.

The Water Replenishment District of Southern California (WRD) manages groundwater replenishment and recharge. Coastal Plain Basin replenishment occurs primarily through percolation of rainfall throughout the Dominguez Watershed via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins. Injection wells are also used to pump freshwater along specific seawater barriers to prevent seawater intrusion. Coastal Plain Basin groundwater generally flows in a south/southwesterly direction. West Coast Subbasin groundwater replenishment occurs through stormwater percolation and imported and recycled water that is injected to prevent seawater intrusion.



The Project site is in Golden State Water Company’s (GSWC) service area, and specifically, within the Southwest System service area, which serves Gardena, seven other cities, and portions of unincorporated Los Angeles County. The Southwest System’s water supply sources are imported water, groundwater wells, and recycled water. The Southwest System is supplied by two active Central Subbasin wells and 12 active West Coast Subbasin wells. As previously noted, the Project site is within the West Coast Subbasin.

Local Setting

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscape, and landscaping.

Surface Water Hydrology

On the Project site, stormwater runoff sheet flows to a catch basin near the West 169th Street and South Normandie Avenue intersection. All roof flows from the southerly existing buildings and paved parking areas are captured by a series of drains and discharge directly to ground level, where they join surface-level sheet flows and discharge to a catch basin on Brighton Way. From the catch basin on Brighton Way, stormwater runoff flows to the Los Angeles County Flood Control District (LACFCD) storm drain system.

Hydrology analysis was conducted to determine peak flows during the 10-year, 25-year, and 50-year storm event under existing and proposed conditions. **Table 4.7-1: Existing Conditions Hydrology**, contains the existing conditions hydrology analysis results; see **Appendix 4.7-1** for existing conditions hydrology calculations. As indicated in **Table 4.7-1**, the Project site is almost entirely (99.7 percent) comprised of impervious surfaces.

Table 4.7-2: Existing Conditions Hydrology

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
A-1	1.34	100	2.61	3.45	4.28
A-2	0.38	100	0.87	1.07	1.21
A-3	0.23	100	0.52	0.65	0.73
A-4	0.58	100	1.32	1.63	1.85
A-5	2.72	98.5	5.29	7.00	8.69
Existing Total	5.25	99.7	10.61	13.80	16.76

Source: **Appendix 4.7-1**, Table 1.

In the vicinity of the Project site, stormwater runoff is collected and conveyed through offsite storm drain facilities along South Normandie Avenue and West 170th Street. Stormwater sheet flows to a catch basin near the West 169th Street and South Normandie Avenue intersection, as well as a catch basin on South Normandie Avenue. The catch basin on 169th Street and Normandie



Avenue discharge into the LACFCD storm drain system which flows southerly. From there, runoff is piped into the LACFCD catch basin near the intersection of West 169th Street and South Normandie Avenue, where it enters a storm drainpipe within the public right-of-way.

After flowing into the LACFCD storm drainpipe, the runoff then flows southerly within the Dominguez Flood Control Channel (Dominguez Channel). The stormwater then flows southerly through Dominguez Channel where it eventually discharges into the Dominguez Channel Estuary, the Los Angeles Harbor, the San Pedro Bay Near/Offshore Zones, and then to the Pacific Ocean.

Surface Water Quality

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. There are no known existing water quality best management practices (BMPs) on the Project site. Stormwater leaves the Project site via an existing catch basin, existing drains, and roof drains which penetrate the finished surface, or exits onto adjacent streets and remains untreated.

Existing potential pollutants at the Project site are likely based on the existing six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. Likely existing pollutants include oil and grease, trash, total suspended solids (TSS), heavy metals, and hydrocarbons from the parking areas.

Groundwater

Groundwater depth is monitored at various stations throughout the County of Los Angeles ("County") with monitoring data accessible on the Los Angeles County Department of Public Works (LACDPW) website (Groundwater Well Map). There is a monitoring well (County Well ID: 792W) approximately 0.2-mile southwest of the Project site.² As of July 19, 2021, groundwater levels were 28 feet below ground surface (bgs) level.³ Groundwater levels have been gradually increasing across sampling measurements from 2011.

Flood Hazard, Tsunami, and Seiche Zone

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM), the Project site is within Zone X. Zone X depicts areas outside of the 0.2-1.0 percent (500-year) annual chance floodplain; see the FEMA FIRM map provided in Appendix E of **Appendix 4.7-1**.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, which can occur in response to ground

² Los Angeles County Department of Public Works. (No Date). *Well Finder*. Retrieved from <https://dpw.lacounty.gov/general/wells/#>, Accessed May, 2023.

³ **Appendix 4.6-4: Phase II Subsurface Investigation Report** .



shaking. The Project site is approximately eight miles east of the Pacific Ocean and there are no nearby bodies of standing water. Therefore, the Project site is not within a tsunami or seiche zone.

Therefore, there is no existing flood, tsunami, or seiche hazard potential for the Project site that would risk release of pollutants due to inundation; see also **Section 7.0: Effects Found Not to be Significant**, for a discussion of the Project’s potential impacts concerning flood hazards, tsunamis, and seiche zones.

4.7.2 REGULATORY SETTING

Federal

Clean Water Act (CWA)

The CWA (33 U.S.C. §1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the U.S. and has given the U.S. Environmental Protection Agency (U.S. EPA) the authority to implement pollution control programs. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402).

In California, NPDES permitting authority is delegated to, and administered by, nine RWQCBs. The City, which is within LARWQCB jurisdiction, operates under Municipal Regional Stormwater NPDES Permit (Order No. R4-2012-0175-A01, NPDES Permit No. CAS004001). This Permit provides the discharge requirements for the MS4 discharges within the Los Angeles County watersheds.

Clean Water Act (CWA) Section 402

Section 402 of the Clean Water Act authorizes the SWRCB to issue NPDES Construction Stormwater General Permit (Water Quality Order 2022-0057-DWQ), referred to as the “Construction Stormwater General Permit.”⁴ The Construction Stormwater General Permit Order was adopted on September 8, 2022 and becomes effective on September 1, 2023. Construction activities can comply with and be covered under the Construction Stormwater General Permit provided they:

⁴ California State Water Resources Control Board. (2022). *National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit)*, Order WQ 2022-0057-DWQ, NPDES No. CAS000002. Retrieved from: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wgo_2022-0057-dwg.pdf, Accessed June 2023.



1. Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that would prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;
2. Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
3. Perform inspections of all BMPs.

The SWPPP must contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the construction site discharges directly to a water body listed on the 303(d) list for sediment. Increased compliance tasks under the Construction Stormwater General Permit include project risk evaluation, effluent monitoring, receiving water monitoring, electronic data submission of the SWPPP and all other permit registration documents, and a Rain Event Action Plan (REAP), which must be designed to protect all exposed portions of a project site within 48 hours prior to any likely precipitation event.

Clean Water Act (CWA) Section 303(d)

CWA §303(d) (CWA, 33 USC 1250, et seq., at 1313(d)) requires states to identify “impaired” water bodies as those which do not meet water quality standards. States are required to compile this information in a list and submit the list to U.S. EPA for review and approval. An affected waterbody, and associated pollutant or stressor, is then prioritized in a list of impaired water bodies known as the 303(d) List. The CWA further requires the development of a TMDL for each listing.

National Flood Insurance Program (NFIP)

The NFIP, implemented by Congress in 1968, enables participating communities to purchase flood insurance. Flood insurance rates are set according to flood-prone status of property as indicated by FIRMs developed by FEMA. FIRMs identify the estimated limits of the 100-year floodplain for mapped watercourses, among other flood hazards. As a condition of participation in the NFIP, communities must adopt regulations for floodplain development intended to reduce flood damage for new development through such measures as flood proofing, elevation on fill, or floodplain avoidance.

State

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California’s water quality control. The California Water Code (CWC) authorizes the SWRCB to



implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

As discussed above, under the CWC, California is divided into nine RWQCBs, governing implementation and enforcement of the CWC and CWA. The Project site is within Region 4, also known as the Los Angeles Region (LARWQCB). Each RWQCB is required to formulate and adopt a Basin Plan for its region. The LARWQCB's Basin Plan is a comprehensive document that reports beneficial uses for surface and ground waters, defines narrative and numeric parameters to protect water quality, and describes implementation programs to protect waters throughout the Region. The Basin Plan must adhere to the policies set forth in the CWC and established by the SWRCB. The RWQCB is also given authority to include within its regional plan water discharge prohibitions applicable to conditions, areas, or types of waste.

Low Impact Development – Sustainable Storm Water Management

On January 20, 2005, the SWRCB adopted sustainability as a core value for all activities and programs conducted by the SWRCB. Low Impact Development (LID) is a sustainable practice that promotes water retention and the protection of water quality. LID design techniques include features that increase infiltration, filtration, storing of water, reduce evaporation, and detain runoff. Ten common LID practices are:

1. Bioretention and Rain Gardens
2. Rooftop Gardens
3. Sidewalk Storage
4. Vegetated Swales, Buffers, and Strips;
Tree Preservation
5. Roof Leader Disconnection
6. Rain Barrels and Cisterns
7. Permeable Pavers
8. Soil Amendments
9. Impervious Surface Reduction and
Disconnection
10. Pollution Prevention and Good
Housekeeping

California Toxics Rule

In 2000, the U.S. EPA promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State. In 1994, a California state court revoked the State's water quality control plans, which contained numeric criteria for water quality. This was in direct violation of the CWA and required EPA action. The EPA then implemented the California Toxics Rule. The EPA promulgated this rule based on Clean Water Act §303(c)(2)(B), which dictates that states must adopt numeric criteria in order to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.



Sustainable Groundwater Management Act

In 2014, California adopted the SGMA to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agencies (GSAs) be formed for all high and medium priority basins in the state. These GSAs must develop and implement Groundwater Sustainability Plans (GSPs) for managing and using groundwater without causing undesirable results: significant groundwater-level declines, groundwater-storage reductions, seawater intrusion, water-quality degradation, land subsidence, and surface-water depletions; these are also referred to as sustainability indicators.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, this would be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is within a “low priority” California Statewide Groundwater Elevation Monitoring groundwater basin that is also part of an adjudicated groundwater. Basins prioritized as low- or very low priority are not required to form a GSA and prepare a GSP. However, these basins are still encouraged to form GSAs and develop GSPs, update existing groundwater management plans, and coordinate with others to develop a new groundwater management plan in accordance with Water Code §10750 et seq.

Senate Bill X7-7 - Water Conservation Bill of 2009

The Water Conservation Bill of 2009 (SBX7-7) requires a statewide 20 percent reduction in urban per capita water use by December 31, 2020. It requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified requirements and requires agricultural water suppliers to prepare plans and implement efficient water management practices.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) preserves, enhances, and restores the quality of California’s water resources. Wastewater generators must obtain a permit to discharge their wastewater. Pursuant to the federal CWA and California’s Porter-Cologne Water Quality Control Act, the SWRCB and LRWQCB regulates wastewater discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. Some wastewater discharges are exempt from federal NPDES requirements, but California law may still apply. Under California law, the SWRCB and LRWQCB require waste discharge requirements for some discharges, in addition to those subject to NPDES permits. Permits contain specific requirements that limit the



pollutants in discharges. They also require dischargers to monitor their wastewater to ensure that it meets all requirements. Wastewater dischargers must maintain their treatment facilities, and treatment plant operators must be certified. The SWRCB and LRWQCB routinely inspect treatment facilities and strictly enforce permit requirements.

Regional

County Waste Discharge Requirements

The LACFCD, the County of Los Angeles, and the City along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements (WDRs) contained in Order No. R4-2012-0175 (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*, which was adopted November 8, 2012. The MS4 Permit Order provides the revised WDRs for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements. Gardena adopted the County's LID Standards Manual to use as its guidelines for stormwater quality mitigation, see *Gardena Municipal Code* Section below.

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 Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 square feet (SF) or greater impervious surface area.

County of Los Angeles Hydrology Manual

The Project site is within a watershed that the County classifies as the Dominguez Watershed. The LACFCD is responsible for providing flood protection, water conservation, recreation, and aesthetic enhancement within this entire watershed. The Los Angeles County Department of Public Works (LACDPW) developed the "Hydrology Manual" (January 2006) ("2006 Hydrology Manual"), which establishes the LACDPW hydrologic design procedures based on historic rainfall and runoff data collected within the County. The Project is required to utilize the 2006 Hydrology Manual and accompanying hydrologic tools including the HydroCalc Calculator to calculate existing and proposed Project discharges and volumes.



County of Los Angeles Department of Public Works Low Impact Development Standards Manual

The County's Department of Public Works prepared the Low Impact Development Standards Manual (February 2014)⁵ (LID Standards Manual) to comply with NPDES MS4 Permit requirements for stormwater and non-stormwater discharges from the MS4 within the County's coastal watershed (CAS004001, Order No. R42012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

Local

City of Gardena General Plan

The Gardena 2006 General Plan (GGP) Community Resource Element provides a Conservation Plan with the following goals and policies concerning hydrology and water quality:

- **CN Goal 2:** Conserve and protect groundwater supply and water resources.
 - **Policy CN 2.2:** Comply with the water conservation measures set forth by the California Department of Water Resources.
 - **Policy CN 2.6:** Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) Chapter 8.70: Stormwater and Runoff Pollution Control, addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States. GMC §8.70.110.B.1: Development Construction, specifies that "construction projects that disturb one or more acres of soil by grading, clearing, and/or excavating or other activities are required to obtain a general construction activity stormwater permit ("GCASWP") from the State Water Resources Control Board ("State Board"). No grading permit shall be issued to such construction projects without obtaining a GCASWP [Construction Stormwater General Permit]," which would be issued by the SWRCB. Additionally, GMC §8.70.110.B.2: Standard Urban Stormwater Mitigation, specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). SUSMP conditions assigned by the City shall consist of: (a) low impact development

⁵ County of Los Angeles Department of Public Works. (2014). Low Impact Development Standards Manual. Retrieved from: [Los Angeles County Low Impact Development \(LID\) Manual.pdf \(lacounty.gov\)](#) , Accessed May 2023.



(LID) BMPs; (b) source control BMPs; and (c) structural and nonstructural BMPs for specific types of uses.

4.7.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning hydrology and water quality. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project could have a significant effect on the environment if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (see Impact 4.7-1);
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (see Impact 4.7-2);
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - Result in substantial erosion or siltation on- or off-site;
 - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
 - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - Impede or redirect flood flows (see Impact 4.7-3);
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation (see **Section 7.0: Effects found not to be significant**);
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (see Impact 4.7-4)



4.7.4 IMPACTS AND MITIGATION MEASURES

Impact 4.7-1:

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

Level of Significance: Less Than Significant Impact

Construction

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping (see **Exhibit 2-2: Local Vicinity Map**). The Project's construction-related activities would include demolition of the existing six industrial buildings, asphalt surface parking lots, hardscapes, landscaped areas, and all existing improvements and excavation of existing soils. Excavation, grading, and trenching could displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. The main pollutant of concern during construction is typically sediment and soil particles that discharge off of the site due to wind, rain, and construction patterns. Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction Stormwater General Permit. Construction activity subject to the Construction Stormwater 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 proposes demolition and construction activities throughout the entire site, with a land disturbance of approximately 5.25 acres. Therefore, the Project would be subject to the Construction Stormwater General Permit. To obtain coverage under the Construction Stormwater General Permit, dischargers are required to file with the State Water Board the Permit Registration Documents, which include a Notice of Intent (NOI) and other compliance-related documents. The Construction Stormwater General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction Stormwater 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 types of required BMPs would be based on the amount of soil disturbed, the types of pollutants used or stored at the Project site, and proximity to water bodies.

The Project would also be required to comply with GMC Chapter 8.70: Stormwater and Runoff Pollution Control, which addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States. GMC §8.70.110.B.1: Development Construction, specifies that no Grading Permit would be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a General



Construction Activity Stormwater Permit [Construction Stormwater General Permit] from the SWRCB.

Following compliance with NPDES and GMC requirements, which include implementation of BMPs as a Condition of Approval, the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Operations

The LACFCD, the County of Los Angeles, and the City of Gardena along with 83 other incorporated cities therein (Permittees) discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. As discussed above, these discharges are regulated under countywide WDRs contained in Order No. R4-2012-0175 (NPDES Permit No. CAS004001). The MS4 Permit Order provides the revised WDRs for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

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. As previously noted, new development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project involves development with land disturbance of 5.25 acres. Additionally, the Project is a new residential development that would replace approximately 228,004 SF (approximately 5.23 acres) of impervious surface area; see **Table 4.7-1**. Therefore, the Project is subject to Los Angeles County's LID Ordinance. Additionally, GMC §8.70.110.B.2: *Standard Urban Stormwater Mitigation*, specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the SUSMP. SUSMP conditions assigned by the City would consist of 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, among others.

Table 4.7-3: Potential Pollutants contains a list of materials anticipated during Project operations, which could contribute to pollutants, other than sediment, to stormwater runoff. The Project proposes LID and site design approaches and BMPs that are designed to address runoff and pollution at the source. See **Appendix 4.7-1** for a description of Project BMPs and Impact 4.7-



3ii for a description of existing and proposed site drainage. Infiltration is Los Angeles County’s first option when screening potentially feasible LID BMPs. Infiltration systems collect stormwater runoff and conduct it into permeable soils beneath the site; effectively reducing pollution, reducing runoff and flooding, and recharging groundwater. The second priority BMP is capturing and reusing stormwater onsite for either landscape irrigation or toilet flushing. Capture and use design features would be implemented to meet the local LID requirements due to high concentration of clay materials and shallow groundwater levels at the Project site.

The Project would treat site runoff in accordance with the LID Standards Manual. To do so, runoff resulting from the 85th percentile rain event would be treated prior to leaving the site. The Project would be subject to Los Angeles County’s LID standards. The City has adopted the County’s LID Standards Manual to use as its guidelines for stormwater quality mitigation. In accordance with these LID standards, the Project would be required to be infiltrated, evapotranspirated, captured and reused, and/or treated through a high efficiency BMP onsite for the 85th percentile storm event or 0.75” — whichever is greater. As specified in the Project’s LID Plan, the Project site’s 85-percentile rain event is 0.88 inch, which is used as the design storm for LID.

Table 4.7-3: Potential Pollutants

Potential Pollutant	Source of Pollutants
Sediment	Parking lots, pedestrians, driveways, building rooftops, landscaped areas, road
Nutrients	Landscape areas, lawns
Pesticides	Landscape areas, lawns
Pathogens	Landscape areas, lawns, building rooftops, vehicular traffic/activities
Trash/Debris	Parking lots, pedestrians, driveways, roadways, vehicles
Oil/Grease	Parking lots, driveways, roadways, vehicles
Metals	Parking lots, driveways, roadways

Source: Appendix 4.7-1, Table 8.

Sizing of all stormwater treatment systems and calculation of stormwater quality design volume (SWQDV) would occur in accordance with the LID Standards Manual and would utilize the Hydrocalc program to ensure accuracy.

Percolation testing was not performed as part of the geotechnical investigation.⁶ Therefore, compliance with LID water quality regulations would be achieved through capture and use BPS, with biofiltration BMPs remaining as an option if currently unknown circumstances arise.

⁶ Appendix 4.4-1: Geotechnical Report



Preliminary and Final LID Plans would be coordinated with the City to satisfy the Project’s water quality requirements. The Project would use Capture and Use BMPs to ensure adequate capacity to capture and utilize the stormwater design volume within the seven-month wet season period. Capture and Use BMPs require pretreatment devices to clean stormwater before it is stored within a cistern. This stormwater is then used for drip irrigation to water plants within the five-month dry season. This requires enough landscape with the correct planting factors to use the captured water within the seven months. The capture and use irrigation system would be appropriately sized in conformance with the LID manual.

There are no known structural or LID BMPs to treat stormwater under the Project site’s existing conditions. Therefore, implementation of the LID features proposed as part of the Project would result in a significant improvement in surface water quality runoff as compared to existing conditions. Implementation of the Project’s proposed BMP system would result in the treatment of the entire required volume for the Project site and the elimination of pollutant runoff up to the 85th percentile storm event.

The Project’s design would ensure all proposed LID BMPs meet applicable County LID Manual requirements to the maximum extent practical. The proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and would assist in improving the groundwater quality. Additionally, the West Coast Subbasin is managed by the WRD and CDWR and is anticipated to meet all groundwater quality requirements. The Project would be subject to all requirements regarding groundwater quality to ensure that no impacts from proposed stormwater infiltration occur.

Following compliance with NPDES and GMC requirements, which include implementation of BMPs as a Condition of Approval, the Project’s operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

<p>Impact 4.7-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?</p> <p><i>Level of Significance: Less Than Significant Impact</i></p>

Construction

The historical high groundwater level in the area is 15 feet bgs and groundwater was encountered during exploration with samples taken up to 22 ft bgs; see **Appendix 4.4-1: Preliminary**



Geotechnical Investigation. Although the Project would require excavation of existing soils excavation would be limited to a minimum 5.0-inch-thick slab with the addition of at least 3.0 feet below footing bottoms for foundation support. Since most of the structures would be above an elevation of 15 feet bgs, it is not expected that groundwater would be encountered during construction that would require temporary or permanent dewatering operations. The excavation depth would be at a higher elevation than the groundwater, therefore, it is not expected groundwater would be encountered. It is possible that perched water zones could potentially be encountered elsewhere on the Project site during excavation. If perched groundwater were to be encountered, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under NPDES General Construction Permit regulations and City grading permit conditions. As a result, potential construction-related groundwater impacts would be less than significant.

During on-site grading and building activities, minimal amounts of hazardous materials such as fuels, paints, solvents, and concrete additives could be used, and the presence of such materials provides an opportunity for hazardous materials to be released into groundwater. The proper management of any resultant hazardous wastes would decrease the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Therefore, impacts would be less than significant, and no mitigation is required.

Operations

There are no groundwater supply wells located on the Project site. The Project does not include any groundwater pumping and relies on GSWC for water service. As previously noted, the Southwest System's water supply sources are imported water, groundwater wells, and recycled water. The Southwest System is supplied by 12 active wells within the West Coast Subbasin, where the Project site is located.

West Coast Subbasin groundwater replenishment occurs through stormwater percolation and imported and recycled water that is injected to prevent seawater intrusion. The Project site is fully developed with industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. As previously indicated in **Table 4.7-1**, the Project site is almost entirely (99.7 percent) comprised of impervious surfaces. Therefore, under existing conditions, stormwater percolation occurs on only approximately 0.3 percent of the Project site. The Project proposes various exterior open spaces, thus, would increase the Project site's pervious surfaces to 14.1 percent. The increase in pervious areas would improve the Project site's stormwater percolation/groundwater recharge capacity over existing conditions. Finally, the Project would include low impact development (LID) best management practices (BMPs) to increase infiltration of



stormwater runoff. Therefore, the Project would not interfere with groundwater recharge. Project impacts would be less than significant.

Concerning the Project’s potential to decrease groundwater supplies, as discussed in detail in **Section 4.15: Utilities and Service Systems**, GSWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Further, the Coastal Plain Basin where the Project site is located, was adjudicated in 1961, and as such, is subject to pumping restrictions to avoid overdraft conditions. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.7-3:
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site?**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? or**
- iv. Impede or redirect flood flows?**

Level of Significance: Less Than Significant Impact

As depicted on the Proposed Hydrology Map (see **Appendix 4.7-1**, Attachment G), the Project site is divided into two Subareas, A-1 and A-2. Subarea A-1 totals 2.13 acres and is 82.7 percent impervious. Subarea A-1 surface flows east to the catch basin near the 169th Street and South Normandie Avenue intersection. Subarea A-2 totals 3.12 acres and is 89.1 percent impervious. Subarea A-2 surface flows south to the LACFD storm drain pipe within West 170th Street where it runs east until it reaches the line in South Normandie Avenue. The proposed Project would result in an increase in landscaped areas throughout the Project site, which would decrease impervious surfaces from 99.7 percent under existing conditions to 85.9 percent under proposed Project conditions. Therefore, the Project would not substantially alter the site’s existing drainage pattern through the addition of impervious surfaces. Further, the Project would not alter the course of a stream or river, as none traverse or are located in the Project vicinity. As shown in **Table 4.7-4: Existing Versus Proposed Drainage Conditions**, the decrease in impervious surfaces on the Project site would result in a reduction of flows under 10-year, 25-year, and 50-year storm events of between 11.7 percent and 13.8 percent when compared to existing conditions; see **Appendix 4.7-1** Attachment H for output calculations.



Table 4.7-4: Existing Versus Proposed Drainage Conditions

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
Existing	5.25	99.70	10.61	13.80	16.76
Proposed	5.25	85.90	9.18	12.10	14.80
Difference	0	13.80	1.43	1.70	1.96
% Change from Existing to Proposed Conditions	-	-13.8%	-13.5%	-12.3%	-11.7%

Source: Appendix 4.7-1, Table 6

(i) Result in a substantial erosion or siltation on- or off-site;

As concluded above, the Project would not substantially alter the Project site’s existing drainage pattern through the alteration of the course of a stream or river or through the addition of impervious surfaces. Further, as concluded in Impact 4.8-1, the Project would be subject to compliance with NPDES and GMC requirements, which include implementation of BMPs, thus, would not result in substantial erosion or siltation on- or off-site. A less than significant impact would occur in this regard.

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

As shown in **Table 4.7-4**, the Project would reduce impervious surfaces thereby reducing flows under 10-year, 25-year, and 50-year storm events between 11.7 percent and 13.8 percent, when compared to existing conditions. Because the Project would decrease surface runoff, it would not result in flooding on- or off-site. No impact would occur in this regard.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or

As shown in **Table 4.7-4**, the Project site would reduce impervious surfaces, thereby reducing flows under 10-year, 25-year, and 50-year storm events, as compared to the existing condition. Because the Project would decrease surface runoff, it would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. No impact would occur in this regard.

(iv) Impede or redirect flood flows?

The Project site is located entirely in FEMA Flood Zone X, outside of the 100-year flood hazard area. Therefore, the Project would not impede or redirect flood flows.



Overall, the Project would not substantially alter the site or area's existing drainage patterns, either through the alteration of a water body or through addition of impervious surfaces. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.7-4:

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

Level of Significance: Less Than Significant Impact

Construction

Project construction activities could result in short-term groundwater quality impacts because of soil or shallow groundwater being exposed to construction activities, materials, wastes and spilled materials. During on-site grading and building activities, minimal amounts of hazardous materials such as fuels, paints, solvents, and concrete additives could be used, and the presence of such materials provides an opportunity for hazardous materials to be released into groundwater. Additionally, as mentioned in **Appendix 4.6-1: North Phase I ESA**, the Phase I ESA for the sites northern portion identified the release of volatile organic compounds VOCs and petroleum hydrocarbons. Thus, the Project requires compliance with **MM HAZ-1**, which requires a construction management plan that includes provisions for responding to the disturbance of undocumented contamination, and compliance with **MM HAZ-2**, which requires an engineered vapor barrier (such as an impermeable membrane) which would protect soil and shallow groundwater from being exposed.

If contaminated soils are found within the excavation limits, contaminated soils would be collected within the excavated material, removed from the Project site, and disposed of in accordance with all applicable regulatory requirements. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials, will reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well.

Therefore, Project construction would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.



Operation

The proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and would assist in improving the groundwater quality. The Project's design would ensure all proposed LID systems meet applicable LA County LID Manual requirements. The proposed LID BMP systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization. Additionally, the West Coast Subbasin is managed by the WRD as well as the CDWR and is anticipated to meet all groundwater demands. The Project would follow all requirements regarding groundwater quality to ensure that no impacts from proposed stormwater infiltration occur. Therefore, Project operations would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.7.5 CUMULATIVE IMPACTS

For purposes of the hydrology and water quality analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

The criteria for analyzing Project cumulative impacts is any project that could violate water quality standards, substantially decrease groundwater supplies or interfere with groundwater recharge, alter existing drainage patterns in a manner that would result in substantial erosion or siltation or result in flooding, impede, redirect flood flows or otherwise contribute to a risk of loss, injury, or death involving water-related hazards, or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The geographic extent for considering cumulative impacts concerning hydrology and water quality includes the Dominguez Watershed. The City, and more specifically the Project site, is located within the Dominguez Watershed, which covers approximately 133 square miles and is largely built out.

As concluded above, following compliance with NPDES and GMC requirements, the Project's construction-related and operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Impervious surfaces would decrease under Project conditions and proposed LID BMPs would increase infiltration of stormwater runoff. Stormwater would be treated by proposed BMPs prior to discharging into the public storm drain system, treating potential pollutants and reducing peak flows leaving the site. BMPs would be located and designed to effectively retain and treat runoff before it is discharged to the storm drain system. All proposed BMPs, including capture and use, would be appropriately sized and located to treat the design storm event. Therefore, the Project would result in a less than significant impact following compliance with NPDES and GMC requirements.



As concluded above, following compliance with all applicable rules and regulations under the NPDES General Construction Permit regulations and City grading permit conditions requirements, the Project's construction-related and operational activities would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede the sustainable groundwater management of the basin. The City's water provider, GSWC, 2020 Urban Water Management Plan - Southwest (UWMP) Tables 5-2, 5-3, and 5-4 identify that water supplies would meet the service area's water demands for normal, single-dry, and multiple dry year conditions through 2045. Finally, the Project and other cumulative projects would include low impact development (LID) best management practices (BMPs) to increase infiltration of stormwater runoff. Therefore, cumulative projects and operational activities would not substantially decrease groundwater supplies or interfere with groundwater recharge such that they may impede the sustainable groundwater management of the basin.

As concluded above, the Project would not substantially alter the Project site's existing drainage pattern through the alteration of the course of a stream or river or through the addition of impervious surfaces. Further, through compliance with NPDES and GMC requirements which include implementation of BMPs, the Project would not result in substantial erosion or siltation on or off of the site. A less than significant impact would occur.

As concluded above, following compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials, will reduce the potential for the construction of the Project to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Short-term groundwater quality impacts could potentially occur during construction of the Project because of soil or shallow groundwater being exposed to construction activities, materials, wastes and spilled materials. During on-site grading and building activities, minimal amounts of hazardous materials such as fuels, paints, solvents, and concrete additives could be used, and the presence of such materials provides an opportunity for hazardous materials to be released into groundwater. However, the Project requires compliance with MM HAZ-1 and compliance with MM HAZ-2 to mitigate significant impacts. Cumulative projects within the City would be required to comply with applicable requirements and would be required to conduct similar analysis and implement project specific mitigation measures under CEQA. A less than significant impact would occur in this regard. Additionally, following compliance with applicable LA County LID Manual requirements, the Project's operational activities would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The Projects proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and will assist in improving the groundwater quality. Cumulative projects would be required to meet applicable LA County LID Manual requirements. The LID BMP systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization. The Project and other projects within the City would follow all requirements regarding groundwater quality to ensure



that no impacts from proposed stormwater infiltration occur. Therefore, Project operation would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant. A less than significant impact would occur in this regard.

Gardena is mostly built out with a high existing impervious condition. Cumulative projects would increase construction activities, potentially resulting in construction-related water quality impacts from increased pollutant concentrations.

Post construction, cumulative projects could increase pollutant concentrations and impervious surfaces, potentially resulting in operational water quality impacts, interference with groundwater recharge with potential groundwater management issues, changes in drainage patterns, and increased stormwater flows with potential downstream capacity issues.

Additionally, cumulative projects could substantially alter the existing drainage patterns and result in substantial erosion throughout the City; impede or redirect flows throughout the City; or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. However, cumulative development would be subject to compliance with the established federal, state, and local regulatory framework (e.g., NPDES and GMC, concerning hydrology and water quality. Most new developments require minimum landscaping, as well as implementation of LID BMPs, which typically increase permeable surfaces and consequently reduce peak flows in stormwater runoff. All new development within the City would be subject to regional and City water quality and peak flow mitigation requirements and would be reviewed on a per-project basis to ensure that water quality and storm drain infrastructure are not adversely impacted. If needed, the City can require on-site detention or upgrades to regional infrastructure. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. Therefore, when combined with cumulative development, the Project's potential impacts concerning hydrology and water quality would not be cumulatively considerable.

4.7.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning hydrology and water quality have been identified.

4.7.7 REFERENCES

California State Water Resources Control Board. (2022). National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit), Order WQ 2022-0057-DWQ, NPDES No. CAS000002. Retrieved from:



https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf, accessed June 2023.

Fusco Engineering, Inc. (2023). *Water Resources Technical Report for Normandie Crossing Specific Plan Project*. See **Appendix 4.7-1**.

Los Angeles County Department of Public Works. (April 19, 2022). Well ID 792 Historical Well Measurement Data. Retrieved from : <https://dpw.lacounty.gov/general/wells/#>, accessed May 2023.

Los Angeles County Department of Public Works. (No Date). *Well Finder*. Retrieved from <https://dpw.lacounty.gov/general/wells/#>, accessed May 2023.



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An architectural rendering of a modern residential building complex. The central focus is a courtyard with a rectangular swimming pool, surrounded by a wooden deck and lounge chairs. The building has multiple stories with balconies and large windows. In the foreground, there are rooftop terraces with wooden decking and some greenery. The overall style is clean and contemporary.

4.8 LAND USE AND PLANNING



4.8 LAND USE AND PLANNING

The purpose of this section is to describe the existing regulatory and environmental conditions related to land use and planning and analyze the Project's potential to physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant impacts.

Information in this section is based primarily on land use and zoning data available from public resources, including among others, the City of Gardena General Plan 2006 (GGP) and the City of Gardena Municipal Code (GMC).

4.8.1 EXISTING SETTING

Local Context

The Project site is in the County of Los Angeles, approximately 12 miles southwest of downtown Los Angeles, in the southeast portion of the City of Gardena ("City"), at 16829, 16835, and 16907 South Normandie Avenue; see **Exhibit 2-1: Regional Vicinity Map**. The City encompasses approximately 6.0 square miles in the County's South Bay region. Gardena is bordered by the City of Hawthorne and unincorporated County lands to the north, the cities of Los Angeles and Torrance to the south, the City of Los Angeles to the east, and unincorporated County lands and the cities of Hawthorne and Torrance to the west.

Gardena is a highly urbanized city that is approximately 99 percent developed. In 2005 there were 44-acres of land considered vacant in the City and as of February 2023, there are only approximately 7.5 vacant acres remaining, which includes approximately 3 acres which cannot be developed.¹ The City's predominant land use has historically been and remains single-family residential, which now accounts for approximately 33 percent of the City's total area. Streets and rights-of-way account for approximately 22 percent of the City's land, while industrial uses account for approximately 15 percent and are largely located north of Rosecrans Avenue between Van Ness Avenue and Normandie Avenue. Multi-family residential land uses, as well as mobile home parks, account for approximately 12 percent of the City. Commercial uses, which are primarily located along Artesia Boulevard, Redondo Beach Boulevard, Crenshaw Avenue, and Western Avenue, account for approximately 10 percent of the City. While much of the City is developed with single-family residential uses, the City's southeast portion where the Project site is located is characterized by both industrial and residential land uses. Arterial roadways such as

¹ City of Gardena. (2006) City of Gardena General Plan, updated 2022.



Vermont Avenue, Western Avenue, Redondo Beach Boulevard, and Rosecrans Avenue are characterized by both industrial and commercial uses, with residential uses located behind them.

The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west; see **Exhibit 2-2: Site Vicinity Map**.

Onsite Land Uses

Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses depicts the onsite land uses and indicates the Project site is currently fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. **Table 4.8-1: Existing Onsite Land Uses** summarizes the existing onsite land uses by APN and address and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. However, 9,324 SF of industrial floor area in one of the buildings on Parcel 4 is not being used due to its dilapidated condition and is therefore not occupiable. The onsite buildings were constructed between circa 1952 and 1978. The building heights of the existing onsite uses is at most 35 feet.² Additionally, the Project site includes a railroad spur from the adjacent Union Pacific Railroad (UPRR) northern track. The spur is associated with former industrial operations but is no longer in use.

Table 4.8-1: Existing Onsite Land Uses

Parcel ID ¹	APN ²	Size (Acres) ³	Address ³	Existing Land Use	Building (Square Feet) ³	Year Built ³
1	6106-030-011	0.55	16829 South Normandie Avenue	Industrial	10,880	1963
2	6106-030-015	0.47	16835 South Normandie Avenue	Industrial	9,600	1957
3	6106-030-016	0.30	No Address	Industrial	-	-
4	6106-030-017	3.93	16907 South Normandie Avenue	Industrial	94,9443	1952
	Total	5.25		Industrial	115,424 ⁴	

Notes:

1. Identification number (ID) correlates with labels on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses**.
2. Accessors Parcel Number (APN)
3. ParcelQuest. (January 2021). Assessor Data. Retrieved from: <https://pqweb.parcelquest.com/#home>.
4. This total includes 9,324 square feet of building that is unoccupied and dilapidated.

² Estimated structure height measurement taken using 3D Path Ruler on Google Earth. Accessed May 2023.





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Surrounding Land Uses

The Project site is generally surrounded by single- and multi-family residential uses. There are two immediately adjacent parcels that are outside the Specific Plan area but included within the Project's proposed entitlement actions: the parcel immediately adjacent to the Project site's southwest corner, at 16964 Brighton Avenue, which is occupied by a single-family residential (SFR) DU; and the parcel immediately adjacent and to the east, which is occupied by Union Pacific Railroad (UPRR) tracks; see **Section 2.3: Project Characteristics**. The surrounding land uses are depicted on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses** and described below:

- **North:** West 169th Street is to the north, with a 63-unit single-room occupancy multi-family development across the street, at 16819 South Normandie Avenue.
- **Northeast/Southeast:** Multi- and single-family residential uses are to the northeast/southeast, across South Normandie Avenue, respectively.
- **South:** West 170th Street is to the south, with single-family residential uses across the street.
- **Southwest:** As noted above, there is one single-family residential dwelling unit immediately adjacent to the Project site and to the southwest, at 16964 West 179th Street.
- **East:** South Normandie Avenue and, as noted above, there is an existing UPRR track (north/south orientation) immediately adjacent to the Project site and to the east.
- **West:** Brighton Way (an alleyway) is to the west, with single-family and duplex residential uses across the alley.

4.8.2 REGULATORY SETTING

Regional

Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

As the metropolitan planning organization for the region's six counties and 191 cities, the Southern California Association of Governments (SCAG) is mandated by law to develop a long-term regional transportation and sustainability plan every four years. On September 3, 2020, SCAG's Regional Council approved and fully adopted Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It identifies ten goals that fall into four categories: economy, mobility, environment, and healthy/complete communities. The goals are as follows:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods



3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

Goal 10 is not applicable to the Project on a direct or indirect basis because the Project site does not include any agricultural uses or biological resources.

Local

Gardena General Plan 2006

The City adopted the comprehensive Gardena General Plan 2006 (GGP) in 2006. The GGP constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The GGP 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 GGP serves as a decision-making tool to guide future growth and development decisions.

The GGP consists of the following elements and plans:

- Community Development Element
 - Land Use Plan (updated in June 2012, March 2013 and February 2023)
 - Economic Development Plan
 - Community Design Plan
 - Circulation Plan (updated in July 2020)
- Community Resources Element
 - Open Space Plan



- Conservation Plan
- Community Safety Element
 - Public Safety Plan (updated February 2022)
 - Noise Plan
- Housing Element (updated in February 2023; see below)
- Environmental Justice Element (adopted in February 2022)
- Implementation
 - Implementation Program (updated in February 2022)

Through its Goals, Objectives, Policies, and Programs, the GGP serves as a decision-making tool to guide future growth and development decisions. The General Plan Goals and policies applicable to the Project are listed in **Table 4.8-2: Gardena General Plan 2006 Consistency** found at the end of this section.

The General Plan designates 13 distinct categories of land use designations (not including Streets and Rights of Way). The General Plan also designates each land use designation with a quantitative measure of intensity of use and the type of uses allowed. In addition to the Land Use Designations, the General Plan includes Overlay Designations, which allow greater flexibility of development alternatives and provide opportunities for housing to meet the City's housing needs. The overlays allow properties to be developed as the underlying land use, as residential areas, or as a combination of commercial and residential uses. **Table 4.8-2**, lists the Project site's existing land use designations and indicates almost all of the Project site (approximately 3.93 acres) is designated Industrial, while the remainder (approximately 1.32 acres) is designated Industrial, High Density 30 Overlay. The Industrial designation provides for a wide range of clean and environmentally friendly industries, technology-related uses and supporting facilities, and business parks.³ The High Density 30 Overlay provides for 21 to 30 dwelling units per acre (DU/AC). As indicated in **Table 4.8-2**, the Project site's maximum development capacity, based on the existing land use designations, is 40 DU (on the northerly portion) and/or approximately 228,690 SF of industrial floor area throughout the site.

The parcel immediately adjacent to the Project site's southwest corner, at 16964 West 179th Street, and the parcel immediately adjacent and east of the Project site are both designated Industrial.

³ City of Gardena. (2006). *City of Gardena General Plan 2006, Updated 2022*. Figure LU-2: 2013 General Plan Land Use Policy Map. Gardena, CA: City of Gardena.



Table 4.8-2: Existing General Plan Land Use Designations

Parcel ID ¹	Assessor's Parcel Number	Size (Acres)	Existing Land Use Designation			
			General Plan Land Use ^{2,3}	Intensity (FAR)/Density (DU/AC) ^{3,4,5}	Non-Residential Development Capacity (SF) ⁵	Residential Development Capacity (DU) ⁵
1	6106-030-011	0.55	Industrial, High Density 30 Overlay	1.0 FAR/30 DU/AC	23,958	17
2	6106-030-015	0.47	Industrial, High Density 30 Overlay		20,473	14
3	6106-030-016	0.30	Industrial, High Density 30 Overlay		13,068	9
4	6106-030-017	3.93	Industrial	1.0 FAR	171,191	0
	Total	5.25			228,690	40

Notes:

1. Identification number (ID) correlates with labels on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses**.
2. City of Gardena. (2006). *Gardena General Plan 2006, updated 2022, Figure LU-2: 2013 General Plan Land Use Policy Map*. Gardena, CA: City of Gardena. Accessed April 2023.
3. City of Gardena. (2021). *Gardena Housing Element 2021-2029, page 66*.
4. City of Gardena. (2006). *Gardena General Plan 2006, updated 2022, page LU-19*.
5. FAR = Floor Area Ratio; DU/AC = dwelling units per acre; SF = square feet; DU = Dwelling Units.

City of Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 17.16 - Vesting Tentative Maps. Establishes procedures for implementation of the vesting tentative map statute and supplements the provisions of the Subdivision Map Act. This chapter specifies that land that is subdivided and developed as a vesting tentative map must be consistent with the General Plan, any applicable Specific Plan and any other provisions of the GMC.

GMC Title 18 - Zoning. Among other purposes, GMC Title 18 was adopted to encourage, classify, designate, regulate, restrict and segregate the highest and best location and use of buildings and structures for residence, commerce, trade, industry, water conservation or other purposes in appropriate places and for such purposes to divide the city into zones of such number, shape and area as may be deemed best suited to carry out these regulations and provide for their enforcement.

The zones established by Title 18 and the boundaries of such zones are shown on a map, which is designated as the “official zoning map.” **Table 4.8-3: Existing Zoning**, lists the Project site’s existing zoning and indicates almost all of the Project site (approximately 3.93 acres) is zoned Industrial Zone (M-2) while the remainder (approximately 1.32 acres) is zoned General Industrial Zone (M-1), High density 30 overlay (HO-4). The M-1 and M-2 zones are intended for general



industrial uses; see Gardena Municipal Code (GMC) Chapters 18.36 and 18.38 for permitted uses in these zones. Additionally, the Housing Overlay 4 (HO-4) zone allows 21-30 DU/AC.

Table 4.8-3: Existing Zoning

Parcel ID ¹	Assessor's Parcel Number	Size (Acres)	Existing Zoning ^{2,3,4}
1	6106-030-011	0.55	Industrial Zone (M-1), ⁴ Housing Overlay 4 (HO-4) ⁵
2	6106-030-015	0.47	Industrial Zone (M-1), Housing Overlay 4 (HO-4)
3	6106-030-016	0.30	Industrial Zone (M-1), Housing Overlay 4 (HO-4)
4	6106-030-017	3.93	General Industrial Zone (M-2) ⁶
	Total	5.25	

Notes:

1. Identification number (ID) correlates with labels on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses**.
2. City of Gardena. (2020). Zoning Map. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf. Accessed April 2023.
3. See GMC §18.38.010: General Industrial Zone (M-2).
4. See GMC §18.36.010: Industrial Zone (M-1).

GMC Chapter 18.39 - Specific Plans. Establishes procedures for consideration of specific plans as authorized by Government Code §65450 et seq. and other applicable provisions of law. It also describes the relationship between an adopted specific plan and **GMC Title 18**.

GMC Chapter 18.44 - Site Plan Review. Establishes the procedure for site plan review, prior to issuance of a Building Permit. Additionally, this chapter specifies that Site Plans are required to be submitted for any development project for which a General Plan Amendment, Zone Change, Conditional Use Permit, Variance, Tract Map, or other discretionary permit is being sought.

GMC Chapter 18.52 - Amendments. Establishes procedures for requests to amend, supplement or change the land use designation, regulations, zone boundaries or classifications of property in accordance with California Government Code procedures.

4.8.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to land use and planning. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Physically divide an established community (see **Section 7.0: Effects Found Not to be Significant**);



- 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:
 - Gardena General Plan 2006 (see Impact 4.8-1),
 - Gardena Municipal Code (see Impact 4.8-2),
 - Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (see Impact 4.8-3).

Methodology

This analysis analyzes the Project’s consistency with regional and local plans, policies, and regulations for the purposes of avoiding or mitigating an environmental effect. Specifically, the Project was analyzed for consistency with the applicable local and regional land use plans, policies, and/or regulations (i.e., GGP and SCAG’s RTP/SCS). This analysis also analyzes whether the Project would physically divide an established community.

Approach to Analysis

This analysis of impacts concerning land use and planning examines the Project’s consistency with existing land use plans, policies, and regulations. Each criterion is discussed in the context of the Project site and the surrounding characteristics/geography. The impact conclusions consider the potential for changes in land use conditions, as well as compliance with the regulatory framework enacted to protect the environment. The baseline conditions and impact analyses are based on review of Project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents.

4.8.4 IMPACTS AND MITIGATION MEASURES

<p>Impact 4.8-1: Would the Project cause a significant environmental impact due to a conflict with any Gardena General Plan 2006 land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect?</p> <p><i>Level of Significance: Less Than Significant Impact</i></p>
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Land Use Designation

As previously noted, the Gardena General Plan’s Land Use Plan designates almost all of the Project site (approximately 3.93 acres) as Industrial, while the remainder (approximately 1.32 acres) is designated Industrial and High Density 30 Overlay. The Industrial designation provides for a wide range of clean and environmentally friendly industries, technology-related uses and supporting facilities, and business parks. The High Density 30 Overlay provides for 21 to



30 dwelling units per acre (DU/AC). The Project proposes the Normandie Crossing Specific Plan (NCSP) to establish a maximum allowable development of up to 403 DU. The multi-family residential development proposes two types of residential uses: an apartment building with 328 DU at the Project site’s northern portion; and 75 townhome-style units within nine buildings; see **Exhibit 2-4: Conceptual Site Plan**. Overall, the Project site would be developed at a density of approximately 77 DU/AC, **Table 2-3: Surrounding Land Use and Zoning**, summarizes the proposed development according to land use type. As such, the proposed multi-family residential development would conflict with the Project site’s existing Industrial land use designation. Therefore, concerning the NCSP area, a General Plan/General Plan Map Amendment is proposed to: (i) change the land use designation on the General Plan Land Use Map from “Industrial” and “Industrial, High Density 30 Overlay” to “Specific Plan” and (ii) amend the Land Use Plan text and Land Use Plan Table LU-3 to allow the mix of uses and densities specified in the NCSP. Separate and unrelated to the NCSP and concerning the residential parcel at 16964 Brighton Avenue, a General Plan amendment is proposed to change the land use designation on the General Plan Land Use Map from Industrial to Single-Family Residential and rezone from General Industrial Zone (M2) to Single Family Residential Zone (R-1) consistent with the existing residential land use. Concerning the parcel immediately adjacent and east of the Project site that is currently occupied by UPRR tracks, the Project proposes to redesignate the property from Industrial to Public/ Institutional, and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use. The Project Applicant seeks approval of General Plan Amendment/General Plan Map Amendment (GPA #3-21) to implement these changes. This amendment would occur pursuant to **GMC Chapter 18.52**, which establishes procedures to amend, supplement, or change a property’s land use designation. Following approval of the requested General Plan Amendment, the Project would not conflict with the GGP Land Use Plan, thus, would not cause a significant environmental impact in this regard.

Gardena General Plan 2006 Goals and Policies

Table 4.8-4: Gardena General Plan 2006 Analysis evaluates the Project concerning the relevant GGP goals and policies, and concludes the Project would not conflict with the relevant General Plan goals and policies. Therefore, the Project would not result in a significant environmental impact concerning a conflict with the GGP.

Table 4.8-4: Gardena General Plan 2006 Analysis

General Plan Policy	Project Analysis
Community Development Element: Land Use Plan	
LU Goal 1: Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City.	
Policy LU 1.1: Promote sound housing and attractive and safe residential neighborhoods.	No Conflict. The NCSP would implement new zoning and development standards to promote development of high-quality housing in the City. The Project facilitates the surrounding neighborhood’s transition into a more



General Plan Policy	Project Analysis
	complete community, in that it would bring new residents to the neighborhood, bring new housing to this area, improve the streetscape, and activate the pedestrian realm.
<p>Policy LU 1.2: Protect existing sound residential neighborhoods from incompatible uses and development.</p>	<p>No Conflict. Factors influencing land use compatibility include aesthetics, air quality, noise, and traffic. As concluded in Section 4.2: Air Quality, Section 4.9: Noise, Section 4.13: Transportation, and Section 4.16 Aesthetics, respectively, the Project would result in less than significant operational impacts concerning these resource areas, which in turn would influence land use compatibility. The surrounding properties include single- and multi-family land uses. Therefore, the Project would be a compatible land use and would involve removal of potentially incompatible industrial uses with NCSP approval.</p>
<p>Policy LU 1.4: Locate new medium- and high-density residential developments near neighborhood and community shopping centers with commensurate high levels of community services and facilities.</p>	<p>No Conflict. Commercial uses and services are located approximately 0.16 mile south of the Project site at the Artesia Boulevard at Normandie Avenue intersection. These shopping centers are characterized by commercial and retail uses that would provide community services and facilities to the Project’s future residents. Additionally, the Project would cluster urban-density housing at an appropriate location in the vicinity of the Harbor Gateway Transit Center, which would offer easy access to public transportation and reduce their automobile dependence.</p>
<p>Policy LU 1.5: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multi-family residential developments.</p>	<p>No Conflict. The Project would incorporate quality residential amenities, including private and community open spaces. The Project’s apartment amenities include a fitness room, dog park, and bike room on the ground level; pools, BBQ’s and courtyards with fire pits on level three; and a roof deck and club room on level seven. The Project’s townhome amenities include a dog park, paseos, courtyard with BBQ’s and fire pits, and a pool. The Project provides adequate residential amenities which would create more attractive and livable spaces for residents. The Project would also provide approximately 399 off-street vehicle and 173 bicycle parking spaces.</p>
<p>Policy LU 1.6: Ensure residential densities are compatible with available public service and infrastructure systems.</p>	<p>No Conflict. The Project permits residential density compatible with available public service and infrastructure systems. As described in Section 4.12: Public Services and Recreation, and Section 4.15: Utilities and Service Systems, the Project includes measures to ensure that the plan area is served by adequate public services, infrastructure, and utilities.</p>



General Plan Policy	Project Analysis
<p>Policy LU 1.8: Minimize through-traffic on residential streets.</p>	<p>No Conflict. The Project proposes three vehicle access points at 169th Street (north), 170th Street (south), and Normandie Avenue (east). 169th Street and 170th Street are classified as Local Streets in the GGP. Traffic on these two roadways proceed to Normandie Avenue, which is classified as a Major Collector. The Project minimizes through-traffic on residential streets by orienting vehicular access towards Normandie Avenue.</p>
<p>Community Development Element: Economic Development Plan</p>	
<p>ED Goal 3: Attract desirable businesses to locate in the City.</p>	
<p>Policy ED 3.3: Maintain a multidisciplinary proactive approach to improve the City's image as a desirable business location.</p>	<p>No Conflict. The Project facilitates the development of quality housing near local technology and creative sector companies and other employment centers to further attract desirable businesses to locate in the City. Innovative technology firms and their employees place a premium on quality-of-life and livability factors, including access to quality housing options; social, cultural, and environmental amenities; access to shops and restaurants; and low-stress commutes. Project implementation would help alleviate the negative impacts of a lack of housing for local technology and creative sector employees. The Project adopts a multi-disciplinary, proactive approach, balancing job growth in the expanding technology sector with new high-quality housing opportunities to enable local employees to live close to where they work.</p>
<p>Community Development Element: Community Design Plan</p>	
<p>DS Goal 1: Enhance the visual environment and create a positive image of the City.</p>	
<p>Policy DS 1.3: Promote a stronger design review process to ensure that public and private projects comply with best design practices and standards.</p>	<p>No Conflict. The Project has been subject to City review and approval to ensure that future development is held to quality design practices and standards.</p>
<p>Policy DS 1.4: Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.</p>	<p>No Conflict. The Project would enhance the visual environment by replacing obsolete, industrial warehouse buildings with a new multi-family development. The Project would incorporate high-quality design and landscaping consistent with the Specific Plan standards. Developing new residential uses in proximity to growing local technology and creative sector industries would help create a positive image of the City. The Project would provide onsite landscaping features and a high-quality sign identifying the Project, consistent with GMC Chapter 18.58 sign standards, at a key gateway location in the City.</p>



General Plan Policy	Project Analysis
DS Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City.	
<p>Policy DS 2.1: Provide stronger design guidelines for residential development, including both new construction and additions to existing single-family units or multi-family dwellings.</p>	<p>No Conflict. The Project is intended to achieve quality and attractively designed development that can serve as a model for future multi-family development in the City. The Project would replace aged and dilapidated industrial warehouse buildings with a residential development that is intended to serve as a catalyst to transform southeast Gardena into a multi-family neighborhood.</p>
<p>Policy DS 2.2: Ensure that new and remodeled dwelling units are designed with architectural styles, which are varied and are compatible in scale and character with existing buildings and the natural surroundings.</p>	
<p>Policy DS 2.3: Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.</p>	<p>No Conflict. The NCSP development standards would ensure the development includes a variety of massing, floorplans, color schemes, façade treatments, elevations, and wall articulations.</p>
<p>Policy DS 2.7: Require appropriate setbacks, massing, articulation and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing.</p>	<p>No Conflict. The apartment building portion of the Project design and access is oriented towards Normandie Avenue and away from the nearest single-family housing located to the south and west of the Project site. Further, the Project appropriately transitions building massing from a single- to multi-family scale by locating the townhome style buildings along the Project boundary that borders single-family housing (south and west) and the apartment building near the multi-family apartments (north) and Normandie Avenue (east).</p>
<p>Policy DS 2.9: Integrate new residential developments with the surrounding built environment. In addition, encourage a strong relationship between the dwelling and the street.</p>	
<p>Policy DS 2.10: Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a “greener” environment for residents and those viewing from public areas.</p>	<p>No Conflict. The Project would provide landscape treatments that would create a “greener” environment. The Project would replace existing industrial warehouses with a multi-family residential building that incorporates street trees to shade the street and sidewalk and create a pedestrian-scale screen between the ground level and upper levels of the building. The upper-level courtyards would all be landscaped and visible from the street, further enhancing the “green” environment for residents and those viewing from public areas.</p>
<p>Policy DS 2.11: Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy.</p>	<p>No Conflict. The Project would incorporate quality residential amenities, including 16,120 SF of private and 20,000 SF of community open spaces. The Project’s apartment amenities include a fitness room, dog park, pool, and bike room on the ground level; pools, BBQs and courtyards on level 3; and a roof deck and club room on level 7. The Project’s townhome amenities include a dog</p>



General Plan Policy	Project Analysis
	park, paseos, courtyard with BBQs, and a pool. These amenities would create more attractive and livable spaces for residents to enjoy.
Policy DS 2.12: Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.	No Conflict. The apartment building portion of the Project would provide parking in an enclosed garage consisting of two vertical floors, starting at the ground level. The parking garage would be accessible only to residents and would be secured by a key fob entry system. Residents would be able to enter the building directly from the parking garage. The townhome units would have enclosed parking garages.
Policy DS 2.14: Require design standards be established to provide for attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.	No Conflict. The Project includes design guidelines to ensure that the Project is designed with a varied but cohesive architectural style. These design standards would ensure that the Project would be designed with attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.
Policy DS 2.15: Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.	No Conflict. The Project would provide a new high-quality residential development through Specific Plan implementation, which would conform to the latest CALGreen sustainability standards and encourage attractive architectural design and features to stimulate residential development and protect the environment.
Community Development Element: Circulation Plan	
CI Goal 1: Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.	
Policy CI 1.1: Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.	No Conflict. The Project’s apartment building portion would provide 173 bicycle parking spaces and 399 auto parking spaces, consistent with the NCSP but less than the City’s parking requirements, providing 1.2 parking spaces per apartment unit. As such, the Project would discourage multi-vehicle households. Providing less parking spaces per unit encourages residents to carpool or seek alternative modes of transportation. The Project further promotes use of multi-modal transportation networks through its close proximity to such networks. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9



General Plan Policy	Project Analysis
	<p>mile to the south, providing more access to public transit opportunities. Further, per the NCSP, new residents who sign a 12-month lease would be offered one free monthly Metro pass. The Project would provide two parking spaces per townhouse unit, plus 10 guest parking spaces.</p>
<p>CI Goal 3: Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.</p>	
<p>Policy CI 3.1: Work with Gardena Municipal Bus Lines and MTA to increase the use of public transit, establish or modify routes, and improve connectivity to regional services.</p>	<p>No Conflict. Transit and pedestrian facilities exist near the Project site. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. To improve access to public transportation, the Project includes the construction of onsite and offsite sidewalks in this area. The Project includes the construction of sidewalks per Local Street requirements along the south side of 169th Street, Brighton Way (west), and 170th Street (south). Additionally, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169th Street. The Project, with the incorporation of these sidewalk improvements, would improve connectivity to regional services and promote alternative modes of transportation for residents. Further, the NCSP proposes that new residents who sign a 12-month lease would be offered one free monthly Metro pass. This provision would increase the use of established public transit in the area.</p>
<p>Policy CI 3.3: Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.</p>	<p>No Conflict. The Project would include reconstruction of sidewalks, curbs, and gutters adjoining the Project site. Furthermore, as mentioned above, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169th Street and onsite along Brighton Way (west) and 170th Street (south) pursuant to the GGP Circulation Element requirements for a Local Street (2 lanes, undivided with parking).</p>
<p>Policy CI 3.4: Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA’s regional bicycle system.</p>	<p>No Conflict. The Project promotes bicycle usage through provision of bicycle access along street frontages and bicycle parking.</p>



General Plan Policy	Project Analysis
Housing Element	
Goal 3.0: Minimize the impact of governmental constraints on housing construction and cost.	
<p>Policy 3.3: Encourage the use of special development zones and other mechanisms to allow more flexibility in housing developments.</p>	<p>No Conflict. The Project reduces the impact of governmental constraints on housing construction and cost by implementing special zoning and development standards to permit more flexibility in housing developments in southeast Gardena. The Project offers an opportunity to create a vibrant, multi-family neighborhood. The Project facilitates more diverse multi-family housing options to serve the City’s growing and evolving technology industry, and balances job growth with new high-quality housing opportunities. By permitting denser development than would otherwise be permitted under existing zoning, the Project incentivizes construction of new multi-family housing with a variety of unit types thereby reducing costs.</p>
Goal 4.0: Provide adequate residential sites through appropriate land use and zoning to accommodate the City’s share of regional housing needs.	
<p>Policy 4.1: Implement land use policies that allow for a range of residential densities.</p>	<p>No Conflict. Upon adoption of the General Plan Amendment and zone change to Specific Plan, the Project would be consistent with land use designations and zoning to provide for the development of multi-family residential development. The provision of up to 403 residential units near regional serving public transit infrastructure assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in southeast Gardena primarily consists of single-family housing with minimal multi-family housing along arterials. The Project permits a greater range of residential densities than is currently permitted in this area of the City. Additionally, three parcels of the existing Project site are designated with a Housing Overlay which identifies that the site has potential to be redeveloped with residential uses to help the City meet its Regional Housing Needs Allocation.</p>
Community Resources Element: Conservation Plan	
CN Goal 2: Conserve and protect groundwater supply and water resources.	
<p>Policy CN 2.2: Comply with the water conservation measures set forth by the California Department of Water Resources.</p>	<p>No Conflict. The Project conserves and protects groundwater supply and water resources through compliance with all applicable regulations, including the water conservation measures set forth by the Department of Water Resources. The Project site is approximately 99.7% impervious under existing</p>
<p>Policy CN 2.6: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to</p>	



General Plan Policy	Project Analysis
ensure compliance with approved disposal procedures.	conditions. ⁴ The Project would reduce the impermeable area to approximately 85.90 %, an approximately 13.80% reduction by incorporating approximately 31,000 SF of new planting areas. The Project would be required to comply with all applicable regulations regarding the disposal of hazardous waste and waste oil during construction.
CN Goal 3: Reduce the amount of solid waste produced in Gardena.	
Policy CN 3.1: Comply with the requirements set forth in the City’s Source Reduction and Recycling Element.	No Conflict. The Project would comply with all applicable local and state requirements for waste diversion during both construction and operations, including the City’s Source Reduction and Recycling Element.
CN Goal 4: Conserve energy resources through the use of technology and conservation methods.	
Policy CN 4.1: Encourage innovative building designs that conserve and minimize energy consumption.	No Conflict. The Project would be a multi-family development subject to Title 24 requirements. The Project would be designed to achieve best practices for architectural design and land development that enhance the City’s infrastructure, reduce consumption of non-renewable resources, and limit pollutants and greenhouse gas emissions. The Project would comply with the 2022 CALGreen sustainability standards, or those in effect at the time that plans are submitted.
Policy CN 4.2: Require compliance with Title 24 regulations to conserve energy.	
CN Goal 5: Protect the City’s cultural resources.	
Policy CN 5.3: Protect and preserve cultural resources of the Gabrielino Native American Tribes found or uncovered during construction.	No Conflict. The Project would incorporate measures to protect and preserve any cultural resources of the Gabrielino Native American Tribe, or any other Tribe, found or uncovered during construction. See Section 4.14: Tribal Cultural Resources.
Community Safety Element: Public Safety Plan	
PS Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors.	
Policy PS 1.6: Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.	No Conflict. The City has considered law enforcement, crime prevention, and fire safety concerns in its Project review. The building and parking structure would be accessible only to residents. The Project proposes 10 guest parking spaces, which would be located near the townhome units. The Project would comply with all applicable Fire Code and fire safety regulations.
PS Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.	
Policy PS 2.3: Require compliance with seismic safety standards in the Uniform Building Code.	No Conflict. The Project would be required to comply with the seismic safety standards in the Uniform Building Code.

⁴ Urban Architecture Lab. (2022). 16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.



General Plan Policy	Project Analysis
<p>Policy PS 2.4: Require geotechnical studies for all new development projects located in an Alquist-Priolo Earthquake Fault Zone or areas subject to liquefaction.</p>	<p>No Conflict. The Project site is near parcels within a liquefaction zone; therefore, a geotechnical study was prepared for the Project area; see Appendix 4.4-1: Preliminary Geotechnical Investigation.</p>
<p>PS Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.</p>	
<p>Policy PS 4.3: Promote professional management of multi-family residential buildings.</p>	<p>No Conflict. The Project’s proposed multi-family residential building would be professionally managed and the property managers would develop standard emergency preparedness plans and procedures.</p>
<p>Community Safety Element: Noise Plan</p>	
<p>N Goal 2: Incorporate noise considerations into land use planning decisions.</p>	
<p>Policy N 2.4: Require mitigation of all significant noise impacts as a condition of project approval.</p>	<p>No Conflict. The Project’s potential for generating noise impacts on the surrounding environment both during construction and operation is addressed in Section 4.9: Noise. As concluded in Section 4.9: Noise, impacts associated with Project onsite construction activities would be significant and unavoidable despite the specified mitigation measures. In accordance with Policy 2.4, mitigation is required to minimize construction noise impacts. As to Policies 2.5 and 2.6, the Project would conduct interior noise level studies and achieve interior noise level standards as required by the Building Code. As to Policy 2.9, the Project would incorporate design features necessary to control residential interior noise levels and minimize exposure of residents to nearby mobile noise sources in accordance with the Building Code standards for interior noise levels.</p>
<p>Policy N 2.5: Require proposed projects to be reviewed for compatibility with nearby noise-sensitive land uses with the intent of reducing noise impacts.</p>	
<p>Policy N 2.6: Require new residential developments located in proximity to existing commercial/ industrial operations to control residential interior noise levels as a condition of approval and minimize exposure of residents in the site design.</p>	
<p>Policy N 2.9: Encourage the creative use of site and building design techniques as a means to minimize noise impacts.</p>	
<p>N Goal 3: Develop measures to control non-transportation noise impacts.</p>	
<p>Policy N 3.2: Require compliance with noise regulations. Review and update Gardena’s policies and regulations affecting noise.</p>	<p>No Conflict. The Project would be subject to compliance with the City’s noise ordinance.</p>
<p>Policy N 3.3: Require compliance with construction hours to minimize the impacts of construction noise on adjacent land.</p>	<p>No Conflict. The Project would be subject to compliance with the City’s regulations regarding permitted construction hours.</p>
<p>Source: City of Gardena. 2006. <i>Gardena General Plan 2006, Updated 2022</i>. https://www.cityofgardena.org/general-plan/. Accessed May 2023.</p>	

Mitigation Measures

No mitigation is required.



Impact 4.8-2:

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

Level of Significance: Less Than Significant Impact

The following is an analysis of the Project concerning the relevant GMC standards.

GMC Title 17: Subdivisions and GMC Chapter 17.16: Vesting Tentative Maps. The Project Applicant is seeking approval of Vesting Tentative Tract Map (VTTM #4-21) for a lot merger and condominium subdivision. GMC Title 17, and more specifically GMC Chapter 17.16 establishes the procedures necessary for the implementation of the vesting tentative map statute and supplements the provisions of the Subdivision Map Act. The regulations set forth in this chapter ensure the preservation of the public health, safety and general welfare and for the promotion of orderly growth and development. This chapter specifies that no land shall be subdivided and developed pursuant to a vesting tentative map for any purpose which is inconsistent with the General Plan and any applicable Specific Plan or not permitted by the zoning provisions or other applicable provisions of the GMC. Following approval of the Vesting Tentative Map, the Project would not conflict with GMC Title 17 or GMC Chapter 17.16.

GMC Title 18, Zoning. The Project Applicant seeks approval of a Zone Change (ZC # 4-21) and Zone Map Amendment to change the Project site's zoning from Industrial (M-1) with a High Density 30 Overlay and General Industrial (M-2) to Normandie Crossing Specific Plan (NCSP). Additionally, the Project requires a Zoning Text Amendment (ZTA #6-21) that would modify the GMC to include the NCSP Zone and meet GMC Title 18 requirements. These approvals are needed for Project development, which replaces warehouse buildings with 403 multi-family residential dwelling units. Adoption of the NCSP (SP #1-21) would establish the Project area's zoning regulations and development standards. The changes would occur pursuant to GMC Chapter 18.39: Specific Plans, which establishes procedures for consideration of Specific Plans, and GMC Chapter 18.52, which establishes procedures to amend, supplement, or change a property's regulations, zone boundaries, or classifications.

Additionally, separate and unrelated to the NCSP, the Project Applicant seeks approval of a Zone Change and Zone Map Amendment for two offsite parcels (APN: 6106-030-008 and 6106-030-800). Specifically, the Project proposes to rezone APN 6106-030-008 from General Industrial Zone (M-2) to Single Family Residential Zone (R-1), consistent with the existing residential land use, and to rezone APN 6106-030-800, which is currently occupied by UPRR tracks, from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use.

Following approval of the requested Zone Changes, Zone Map Amendment, and Zoning Text Amendment, the Project would not conflict with GMC Title 18.



GMC Chapter 18.39: Specific Plans. The Project applicant is seeking approval of the Normandie Crossing Specific Plan (NCSP) (SP #1-21) which would outline the design standards and guidelines for the Project and any future development on the Project site. GMC Chapter 18.39 outlines the required contents of specific plans and approval procedures. The NCSP would be consistent with both the content requirements and procedures. Therefore, the Project would not conflict with GMC Chapter 18.39.

GMC Chapter 18.44: Site Plan Review. Pursuant to GMC Chapter 18.44, review of the development's physical design would occur through the City's Site Plan Review process. Accordingly, the Project Applicant seeks approval of Site Plan Review (SPR #11-21) to verify compliance with GMC standards. Following approval of the Project's Site Plan, the Project would not conflict with GMC Chapter 18.44.

GMC Chapter 18.52: Amendments. The Project Applicant seeks approval of a General Plan Amendment (SP#3-21) to amend the Land Use Plan text and Land Use Plan Table LU-3 to allow multi-family residential development within the NCSP and a General Plan Map Amendment to reflect those changes on the GGP Land Use Map. These approvals are needed for Project development, which proposes one seven-story apartment building with 328 apartments and nine three-story structures which include 75 townhome style units to replace the warehouse buildings currently on the property. Approval of the General Plan Amendment would establish the Specific Plan Land Use and therefore allow the Project to be consistent with the General Plan.

Additionally, separate and unrelated to the NCSP, the Project Applicant seeks approval of a General Plan Amendment and General Plan Map Amendment for two offsite parcels (APN: 6106-030-008 and 6106-030-800). Specifically, the Project proposes to redesignate APN 6106-030-008 from Industrial to Single Family Residential and to redesignate APN 6106-030-800, which is currently occupied by UPRR tracks, from Industrial to Public/Institutional.

As evidenced by the discussions presented above, the Project would not conflict with the GMC following approval of the Project's proposed amendments; therefore, the Project would not cause a significant environmental impact due to a conflict with the GMC. Impacts would be less significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.



Impact 4.8-3:

Would the Project cause a significant environmental impact due to a conflict with any Connect SoCal 2020-2045 RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Level of Significance: Less Than Significant Impact

SCAG established a process to identify a project’s impact on a regional scale and how it could contribute to the region’s plan and vision, given SCAG is also the designated Regional Transportation Planning Agency under State law and is responsible for preparing the RTP, including the SCS. As previously noted, pursuant to SCAG’s Intergovernmental Review (IGR) Program, lead agencies are required to determine the consistency of a regionally significant plan, project, and program with SCAG’s adopted regional plans. A project is considered to be of statewide, regional, or areawide significance if it meets various criteria, including among others, a proposed local general plan, element, or amendment thereof for which an EIR was prepared; see State CEQA Guidelines §15206(b)(1). The Project is considered regionally and areawide significant, given it proposes to amend the City’s General Plan. Therefore, pursuant to SCAG’s IGR Program, as Lead Agency, the City is required to determine the Project’s consistency with SCAG’s adopted regional plans.

The Project would not conflict with the RTP/RCP’s long-term goals and policies concerning air quality, water quality, transportation, and infrastructure; see **Section 4.1: Air Quality**, **Section 4.5: Greenhouse Gas Emissions**, and **Section 4.13: Transportation**, respectively, for further discussion concerning the Project’s potential environmental impacts for these resource areas. Additionally, **Table 4.5-5: RTP/SCS Goals Analysis**, presents an analysis of the Project’s consistency with applicable RTP/SCS goals. As is evidenced by the analysis provided in **Table 4.5-5**, the Project would not conflict with RTP/RCP goals. Therefore, the Project would result in a less than significant impact concerning a potential conflict with an RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures

No mitigation is required.

4.8.5 CUMULATIVE IMPACTS

For purposes of the land use and planning impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic contexts of the land use and planning cumulative analyses are the City, County, and SCAG planning region; see also **Table 3-2: Geographic Context for Cumulative Analysis**.



As concluded above, the Project would not conflict with any applicable GGP, GMC, or RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, following approval of the requested entitlements pursuant to GGP and GMC requirements.

When combining the Project with the other related projects, cumulative development would provide 654,538 SF of non-residential land uses and 1,835 DU. Although other changes in land use plans and regulations may be necessary for other individual future projects, such changes would be required to demonstrate consistency with the GGP and GMC. Given that, upon adoption, the Project would not conflict with the land use policies of the applicable plans, the Project would not combine with any past, present, or reasonably foreseeable future projects to cause a significant adverse cumulative land use impact based on a conflict with a plan or policy. Any associated physical impacts are addressed in the individual EIR topic sections.

As part of their review process, each cumulative project would be required to demonstrate compliance with the provisions of the applicable land use designation(s) and zoning district(s). It is assumed that cumulative development would progress in accordance with the GGP and GMC. Each cumulative project would be analyzed to ensure that the applicable goals and policies are consistently upheld. Project-specific measures would be identified, as needed. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impact by conflicting with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not cause a cumulatively considerable impact concerning land use and planning.

4.8.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning land use and planning have been identified.

4.8.7 REFERENCES

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4.9 NOISE





4.9 NOISE

The purpose of this section is to describe the existing noise-related environmental and regulatory settings and evaluate the Project's potential to generate a substantial temporary/permanent increase in ambient noise levels and/or excessive groundborne vibration/groundborne noise levels, and expose people residing/working in the Project area to excessive airstrip- or airport-related noise levels. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impact.

Information in this section is based primarily on noise and vibration data provided in the Noise Impact Study, 16911 Normandie Project - Gardena, CA ("Noise Impact Study") (Acoustical Engineering Services, Inc., 2023); see **Appendix 4.9-1: Noise Impact Study**.

It is noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Noise Impact Study; see **Appendix 4.9-1**. The third-party review concluded the analysis meets the applicable provisions of Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.9.1 EXISTING SETTING

Characteristics of Noise

Sound is mechanical energy transmitted by pressure waves through a medium such as air or water; the manner in which sound travels is influenced by the physical properties of the medium (such as temperature, density, and humidity). Noise is often defined as unwanted sound. Of the various noise descriptors used to characterize the loudness of a sound, the sound pressure level has become the most common.

The human ear is not equally sensitive to all frequencies on the audible sound spectrum; for this reason, human response is factored into sound descriptions in a process called "A-weighting," expressed as A-weighted decibel (dBA). The dBA is a scale of noise measurement that approximates the human ear's range of sensitivity to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. Sound can vary in intensity by over 1 million times within the range of human hearing; for this reason, the decibel scale is based on logarithms (a system used to shorten calculations in mathematics), which keeps sound pressure measurements within a convenient and manageable range. Because the decibel scale is logarithmic in nature, two noise sources do not combine in a simple additive fashion. For example, if two sources each produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. The noise levels presented in this section are expressed in dBA, unless otherwise indicated.

Stationary noise sources such as idling vehicles or onsite construction equipment are considered "point sources," and noise originating from these sources "attenuates," or decreases, based on



certain physical principles (e.g., spherical spreading). In accordance with these principles, this analysis assumes that noise originating from a point source within 200 feet of a receiver attenuates at a rate of 6.0 dBA per doubling of distance, and noise from a point source greater than 200 feet away attenuates at a rate of 7.5 dBA per doubling of distance. Application of these attenuation rates account for such factors as the absorption of noise waves into ground surfaces, vegetation, and intervening structures.

Noise Exposure and Community Noise

The sound pressure level is a measure of noise experienced by an individual at a given moment. Noise exposure is a measure of noise experienced over a period of time. However, consistent noise levels rarely persist over a long period of time. In fact, community noise varies continuously with time and in relation to the contributing sound sources within the environment. Community noise is primarily the product of many distant noise sources that combine to create a relatively stable background noise environment, and individual contributors to the community noise level are generally unidentifiable. Background noise levels change throughout a typical day, but do so gradually, corresponding with the addition and subtraction of distant noise sources as well as changes in atmospheric conditions. The addition of short duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens) makes community noise constantly variable throughout a day.

To appropriately characterize the community noise environment and evaluate noise impacts, noise exposure must be measured over a period of time. This time-varying nature of environmental noise is characterized using statistical noise descriptors. In addition to dBA, the following noise descriptors are used in this evaluation:

- | | |
|------------------|---|
| dB | The decibel (dB) scale is used to quantify sound intensity, with 0 dB corresponding roughly to the threshold of human hearing, and 120 to 140 dB corresponding to the threshold of pain. |
| dBA | A-weighted decibels (dBA) are measured using a filter that de-emphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to low and extremely high frequencies. |
| Leq | The energy-equivalent sound level (Leq) provides a single numerical value for noise measured over a specified period of time. The Leq is the average noise exposure level for the given time period. |
| L _{max} | The instantaneous maximum noise level (L _{max}) measured during the measurement period. |
| DNL | The day-night average sound level (DNL) is the average of the A-weighted sound levels occurring during a 24-hour period and accounts for the greater sensitivity of most people to noise at night. DNL "penalizes" noise occurring between 10:00 p.m. and 7:00 a.m. by adding 10 dBA to nighttime noise levels. |



CNEL Similar to DNL, the community noise equivalent level (CNEL) treats each evening noise event as though it were three, which adds a 4.77-dB “penalty” for noise events occurring between 7:00 p.m. and 10:00 p.m. Nighttime events are multiplied by ten, which adds a 10-dB penalty to noise events occurring between 10:00 p.m. and 7:00 a.m.

Effects of Noise on People

The effects of noise on people can be placed into three categories: the subjective effects of annoyance, nuisance, and dissatisfaction; interference with activities such as speech, sleep, and learning; and physiological effects such as hearing loss or sudden startling. Environmental noise typically produces effects in the first two categories. Workers at industrial plants often experience noise in the third category. A wide variation exists in the individual thresholds of annoyance, and different tolerances to noise tend to develop based on an individual’s past experiences with noise. Therefore, an important method of predicting human reactions to a new noise environment is to compare the new noise level to the existing noise level to which one has adapted (i.e., the ambient noise level). In general, the more a new noise level exceeds the former ambient noise level, the less acceptable the new noise environment would be judged. The California Department of Transportation (Caltrans) Technical Noise Supplement to the Traffic Noise Analysis Protocol reports the following human responses to changes in noise levels:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside the laboratory, a 3 dBA increase is considered a “barely perceptible” difference (i.e., the change in noise is perceived but does not cause a human response).
- An increase of at least 5 dBA is required before any noticeable change in human response is expected.
- A 10 dBA increase is subjectively heard as an approximate doubling in loudness.

Groundborne Vibration

Vibration is an oscillatory motion through a solid medium. In contrast to airborne noise, groundborne vibration is not a common environmental problem. It is unusual for individuals to perceive vibration from sources such as buses and trucks, even in locations near major roads. However, some common vibration sources produce groundborne vibration that can be felt (e.g., construction activities such as blasting, pile driving, and operating heavy equipment). There are several methods employed to quantify vibration. The measurement used in this analysis—peak particle velocity (PPV)—is defined as the vibration signal’s maximum instantaneous peak. PPV is used to describe vibration impacts on buildings and structures and is expressed in inches per second (in/sec). Typically, groundborne vibration generated by human activity attenuates rapidly with distance from the vibration source. Vibration-sensitive receptors include structures (especially older masonry structures); people (residents, especially the elderly and sick); and



locales with vibration-sensitive equipment such as hospitals, research labs, and production facilities for computer-chip manufacturing.

The responses of human receptors and structures to vibration are influenced by a combination of factors, including soil/rock type, distance from the source, duration, and the number of perceived events. Energy transmitted through the ground as vibration can reach levels that cause structural damage; however, humans are very sensitive, and the vibration amplitudes that can be perceived by humans are well below the levels that cause architectural or structural damage. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2013b) characterizes the annoyance potential of vibration as follows: 0.01 in/sec PPV is “barely perceptible,” 0.04 in/sec PPV is “distinctly perceptible,” 0.1 in/sec PPV is “strongly perceptible,” and 0.4 in/sec PPV is “severe” for continuous/frequent intermittent sources.

Mobile Noise Sources

Mobile noise sources in the Project vicinity consist of vehicular traffic along the area’s roadways. Most of the Project area’s existing mobile noise is generated from vehicles on West 169th Street immediately adjacent/north of the Project site, West 170th Street immediately adjacent/south of the Project site, and South Normandie Avenue immediately adjacent/east of the Project site. Traffic-related mobile source noise is a function of the roadways’ traffic volumes and vehicle speeds. **Table 4.9-1: Offsite Roadway Traffic Noise Levels – Existing Conditions** presents the existing offsite traffic noise levels along the area’s roadways. Additionally, according to the Federal Railroad Administration crossing report (FRA 2023), up to two trains per day travel on the adjacent trains at up to 10 miles per hour. As shown in **Table 4.9-1**, the estimated noise levels along the area’s roadways range from 47.6 dBA CNEL to 68.6 dBA CNEL.

The Project site is not in the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field (“Airport”), approximately 3.4 miles to the northwest. Therefore, airstrip- and airport-related noise levels will not be further discussed in this section.

Table 4.9-1: Offsite Roadway Traffic Noise Levels – Existing Conditions

Roadway Segment	Estimated Traffic Noise Levels ¹ CNEL
	Existing
Normandie Avenue Between 169 th Street and 170 th Street	68.6
West 169 th Street West of Normandie Avenue	55.5
West 170 th Street West of Normandie Avenue	47.6
Source: Appendix 4.9-1 , Table 10	



Stationary Noise Sources

Gardena is highly urbanized and comprised of a mix of residential and non-residential land uses (i.e., commercial, and industrial). The Project area's primary stationary noise sources are urban-related activities (i.e., mechanical equipment, parking areas, and residential areas). The noise associated with these stationary sources may represent a single-event noise occurrence, short-term or long-term/continuous noise.

Noise-Sensitive Receptors and Existing Ambient Noise Levels

Human response to noise varies widely depending on the type of noise, time of day, and receptor sensitivity. The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack thereof, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance. Certain land uses are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. Residential areas are also considered noise-sensitive, especially during the nighttime hours. Additionally, Gardena has various public and private educational facilities, churches, a library, senior housing, and park and recreation facilities that are considered noise-sensitive. The Project site is surrounded by residential uses, as summarized in **Table 2-2: Surrounding Land Uses and Zoning**. Based on a review of the surrounding land uses, the noise-sensitive receptors nearest the Project site are the single--family residential uses located approximately 25 feet to the west.

Six offsite noise-sensitive receptor locations were selected to represent noise-sensitive receptors surrounding the Project area. These noise-sensitive receptors (i.e., R1, R2, R3, R4, R5, and R6) are described in **Table 4.9-2: Existing Ambient Noise Levels**, and their locations are depicted on **Exhibit 4.9-1: Receptor Locations**. Ambient noise measurements were taken at the six offsite noise-sensitive receptor locations on February 3, 2022. The ambient noise measurements were conducted using a Larson-Davis Model 870 Integrating/Logging Sound Level meter, which meets and exceeds the minimum industry performance requirements for "Type 1" standard instruments as defined in the American National Standard Institute (ANSI) S1.4. Daytime and nighttime measurements were conducted at each of the offsite receptor locations and were taken in accordance with the City's standards. As indicated in **Table 4.9-2**, the existing ambient noise levels at the six noise sensitive receptor locations range from 49.0 dBA to 69.9 dBA L_{eq} during daytime hours and from 48.7 dBA to 67.3 dBA L_{eq} during nighttime hours.



Table 4.9-2: Existing Ambient Noise Levels

Offsite Noise-Sensitive Receptors	Approximate Distance from Project Site ¹ (Feet)	Ambient Noise Levels dBA L _{eq}	
		Daytime Hours (7 a.m. to 10 a.m.)	Nighttime Hours (10 p.m. to 7 a.m.)
R1 – Single-Family Residential Use adjacent to Project site’s southwest corner, at 16964 Brighton Avenue	0 (adjacent)	49.0	52.2
R2 – Single-Family Residential Use south of Project site, at 17001 Brighton Way	40	55.1	53.8
R3 – Single-Family Residential Use east of Project site, at 1337 169 th Place	80	69.9	67.3
R4 – Single-Family Residential Use north of Project site, at 16815 Brighton Avenue	60	56.9	56.4
R5 – Single-Family Residential Use west of Project site, at 16904 Brighton Avenue	25	54.8	53.0
R6 – Single-Family Residential Use , west of Project site, at 16934 Brighton Avenue	25	54.6	48.7
R7 – Multi-Family Residential (63-unit single-room occupancy), north of Project sites, at 16819 South Normandie Avenue ²	25	56.9 ²	56.4 ²
Notes: ¹ . Distances are estimated based on Google Earth map and are referenced to the Project site’s nearest property line. ² . This receptor was under construction when the ambient noise measurements were taken on February 3, 2022. Therefore, no noise measurements were taken at this receptor location at that time. Because receptor locations R4 and R7 share similar surrounding land uses and distance from the Project site, receptor location R4’s ambient noise levels are considered representative of receptor location R7’s ambient noise levels, thus, are assumed for analysis purposes.			
Source: Appendix 4.9-1 , Table 4.			

Vibration-Sensitive Receptors

Vibration-sensitive receptors include structures (especially older masonry structures); people (residents, especially the elderly and sick); and locales with vibration-sensitive equipment such as hospitals, research labs, and production facilities for computer-chip manufacturing. The six offsite noise-sensitive receptor locations identified above were also selected to represent vibration-sensitive receptors surrounding the Project area. There are no older masonry structures or locales with vibration-sensitive equipment in the Project vicinity.



EXHIBIT 4.9-1: RECEPTOR LOCATIONS
Normandie Crossing Specific Plan Project





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4.9.2 REGULATORY SETTING

STATE

California Noise Standards

California does not have statewide standards for environmental noise, but the California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land use types is categorized into four general levels: “normally acceptable,” “conditionally acceptable,” “normally unacceptable,” and “clearly unacceptable.” For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be “normally acceptable” for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be “clearly unacceptable.” In addition, California Government Code §65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with §65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

California Vibration Standards

There are no state-established vibration standards. Moreover, according to the Caltrans’ Transportation and Construction Vibration Guidance Manual, there are no official Caltrans standards for vibration. However, this manual provides guidelines that can be used as screening tools for assessing the potential for adverse vibration effects related to structural damage and human perception. The manual is meant to provide practical guidance to Caltrans engineers, planners, and consultants who must address vibration issues associated with the construction, operation, and maintenance of Caltrans projects.

LOCAL

City of Gardena General Plan

The Gardena 2006 General Plan (GGP) includes a Community Safety Element that provides a Noise Plan, the basis of which is to achieve and maintain environmental noise control. The following goals and policies for the treatment of noise are applicable to the Project:

- **N Goal 2:** Incorporate noise considerations into land use planning decisions
 - **Policy N 2.4:** Require mitigation of all significant noise impacts as a condition of project approval.
 - **Policy N 2.5:** Require proposed projects to be reviewed for compatibility with nearby noise-sensitive land uses with the intent of reducing noise impacts.



- **Policy N 2.6:** Require new residential developments located in proximity to existing commercial/industrial operations to control residential interior noise levels as a condition of approval and minimize exposure of residents in the site design.
- **Policy N 2.9:** Encourage the creative use of site and building design techniques as a means to minimize noise impacts.
- **N Goal 3:** Develop measures to control non-transportation noise impacts.
 - **Policy N 3.2:** Require compliance with noise regulations. Review and update Gardena’s policies and regulations affecting noise.
 - **Policy N 3.3:** Require compliance with construction hours to minimize the impacts of construction noise on adjacent land.

Further, the City has adopted noise compatibility guidelines for land use planning. The types of land uses and the acceptable noise categories for each land use are included in the GGP Noise Plan. The level of acceptability of the noise environment is dependent upon the activity associated with the particular land use. **Table 4.9-3: Gardena Noise and Land Use Compatibility** provides the exterior noise standard associated with various land uses, as provided in the City Noise Plan. According to the City, an exterior noise environment up to 65 dBA CNEL is “conditionally acceptable” for single- and multi-family residential uses. In addition, noise levels up to 75 dBA CNEL are “normally unacceptable,” while noise levels at 75 dBA CNEL and above are “clearly unacceptable” for residential.

Land Use Category	CNEL, dBA ¹						
	<	55	60	65	70	75	80
Residential – Single-family, multi-family, duplex	A	A	B	C	C	NA	NA
Residential – Mobile homes	A	A	B	C	C	NA	NA
Transient Lodging – Motels, hotels	A	A	B	B	C	C	NA
Schools, Libraries, Churches, Hospitals, Nursing Homes	A	A	B	C	C	NA	NA
Auditoriums, concert Halls, Amphitheaters, Meeting Halls	B	B	C	C	NA	NA	NA
Sports Arenas, Outdoor Spectator Sports, Amusement Parks	A	A	A	B	B	NA	NA
Playgrounds, Neighborhood Parks	A	A	A	B	C	NA	NA
Golf Courses, Riding Stables, Cemeteries	A	A	A	A	B	C	C
Office and Professional Buildings	A	A	A	B	B	C	NA
Commercial Retail, Banks, Restaurants, Theaters	A	A	A	A	B	B	C



Table 4.9-3: Gardena Noise and Land Use Compatibility

Land Use Category	CNEL, dBA ¹						
	<	55	60	65	70	75	80
Industrial, Manufacturing Utilities, Wholesale, Service Stations	A	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A	A

Notes:
¹ CNEL = Community Equivalent Noise Level; dBA = Decibel
 A = Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
 B = Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
 C = Normally Unacceptable – New construction or development should generally be discouraged. If it does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
 D = Clearly Unacceptable – New construction or development should generally not be undertaken.
 NA = Not Applicable

Source: City of Gardena General Plan, 2006, Updated 2022.

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) §8.36.040 – Exterior Noise Standards. Establishes the City’s exterior noise standards, respectively, in terms of Leq(15) and Lmax. **Table 4.9-4: Gardena Allowable Exterior Noise Levels**, provides the allowable exterior noise levels at the affected property receiving the noise by land use category. GMC §8.36.040(C) states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standard.

Table 4.9-4: Gardena Allowable Exterior Noise Levels

Type of Land Use	15-minute Average Noise Level, dBA (Leq)		Maximum Noise Level, dBA (Lmax)	
	7 a.m. - 10 p.m.	10 p.m. - 7 a.m.	7 a.m. - 10 p.m.	10 p.m. - 7 a.m.
Residential	55	50	75	70
Residential portions of mixed-use	60	50	80	70
Commercial	65	60	85	80
Industrial or manufacturing	70	70	90	90

Source: Gardena Municipal Code §8.36.040, 2020.

City of Gardena Municipal Code (GMC) §8.36.050 – Interior Noise Standards. Establishes the City’s interior noise standards respectively, in terms of Leq(15) and Lmax. GMC §8.36.050(C) states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standard.



City of Gardena Municipal Code (GMC) §8.36.070 – Prohibited Acts. GMC §8.36.070 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.

City of Gardena Municipal Code (GMC) §8.36.080 – Exemptions. –This section establishes that the provisions of the City noise standard shall not apply to the following:

Item G - Noise associated with construction, repair, remodeling, grading or demolition of any real property, provided said 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 Saturdays, or anytime on Sundays or federal holidays.

Item H – Operation of refuse and recyclable collection vehicles, provided:

- 1) Collection of residential refuse/recyclables does not occur between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, or at any time on weekend or holiday, except as provided below.
- 2) Collection from commercial premises, audible in residential areas, and which does not occur between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, or at any time on a weekend or holiday, except as provided below.
- 3) When a collection day occurs on a holiday, alternative collections may be made on the following Saturday, between the hours of 7:00 a.m. and 6:00 p.m.

It is noted, while the GMC does not have a quantitative construction noise standard, the City utilizes a 10 dBA over ambient threshold to analyze construction noise impacts under CEQA. Pursuant to Caltrans, 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.¹

Applicable Vibration Standards

City of Gardena Municipal Code (GMC) §8.36.070 – Prohibited Acts. This section prohibits the operation of any device that creates vibration which is above the vibration perception threshold of an individual at or beyond the real property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way. The vibration perception threshold as defined by the GMC is 0.01 in/sec over the range of 1 to 100 Hz (80 VdB).²

4.9.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning noise. The questions presented in the Environmental Checklist have been used as threshold of

¹ California Department of Transportation. (2013). *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, pages 71 and 207. Retrieved from <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>. Accessed August 2023.

² The 80 VdB significance threshold is based on the City vibration limit of 0.01 in/sec converted to VdB, $80 \text{ VdB} = 20 * \log(0.01 * 1,000,000)$.



significance in this section. Accordingly, the Project may create a significant environmental impact and it would:

- Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (see **Impact 4.9-1**).
- Result in the generation of excessive groundborne vibration or groundborne noise levels
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels

METHODOLOGY AND ASSUMPTIONS

Temporary Construction Noise

Construction noise impacts from the Project's onsite construction activities were evaluated by calculating the construction-related noise levels at representative noise-sensitive receptor locations and comparing these estimated Project construction-related noise levels to the existing ambient noise levels (i.e., noise levels without Project construction noise). Project construction noise was analyzed based on the Project's potential construction equipment inventory, construction durations, and construction schedule. The construction equipment noise levels are based on the published noise data (equipment source levels) by Federal Highway Administration (FHWA) "Roadway Construction Noise Model." (FHWA, 2006) Project construction noise levels were then calculated for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. A 5 dBA attenuation was assigned for receptor locations where the acoustic line-of-sight is just interrupted (i.e., around the edge of a building).

In addition, the construction-related offsite trucks noise impacts were analyzed using the FHWA's Traffic Noise Model (TNM). The TNM noise model calculates the hourly L_{eq} noise levels generated by construction-related trucks. Noise impacts were determined by comparing the Project's estimated construction noise levels with the existing ambient noise levels.

Temporary Construction Vibration

Ground-borne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptors, and comparing the Project's activities to the applicable vibration significance thresholds.

Operation Noise

Offsite roadway noise was analyzed using the FHWA's TNM, based on the roadway traffic data provided in the Project's transportation study. The TNM is the current Caltrans standard



computer noise model for traffic noise studies. The model allows for the input of roadway parameters, noise receivers, and sound barriers (if any). Roadway noise attributable to the project “existing plus project” was calculated and compared to “existing without project” noise levels to determine project noise impacts.

Onsite stationary point-source noise impacts were evaluated by (1) identifying the noise levels that would be generated by the Project’s stationary noise sources, such as rooftop mechanical equipment, outdoor activities (i.e., use of the dog run/park, courtyards, open spaces, pools, and open decks), parking facilities, and trash compactor; (2) calculating the noise level from each noise source at surrounding noise-sensitive receptor property line locations, including the composite noise of all sources; and (3) comparing such noise levels to City noise standards and ambient noise levels to determine significance. The onsite stationary noise sources were calculated using the SoundPLAN, a 3-dimensional computer noise prediction model.

4.9.4 IMPACTS AND MITIGATION MEASURES

<p>Impact 4.9-1: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p> <p><i>Level of Significance: Significant Unavoidable Impact</i></p>

CONSTRUCTION (NOISE)

Noise impacts from Project construction activities would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Project construction activities would generally include demolition, site grading, site preparation, foundation construction, building construction, and paving/landscaping. Each stage of construction would involve the use of various construction equipment types and would, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically require the use of earth-moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of forklifts, concrete trucks, concrete pumps, and delivery trucks. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project site. The duration of the Project’s construction activities is estimated to be approximately 3.5 years.

Table 4.9-5: Construction Equipment Noise Emission Reference Levels and Usage Factors shows individual pieces of construction equipment that would be used for construction produce maximum noise levels of 74 dBA to 81 dBA at a reference distance of 50 feet from the noise source. The construction equipment noise levels at 50 feet from the source (Referenced Maximum Noise Levels) are based on the FHWA Roadway Construction Noise Model User’s Guide



(RCNM) (FHWA, 2006), which is a technical report containing actual measured noise data for construction equipment. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operates under less than full power conditions, or partial power. To characterize the Project’s construction-period noise levels more accurately, the average (hourly L_{eq}) noise level associated with each construction stage was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.³ These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table 4.9-5: Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (%)	Reference Maximum Noise Levels at 50 Feet, ¹ L_{max} (dBA)
Backhoe	40	78
Concrete Mixer Truck	40	79
Crane	16	81
Dozer	40	82
Forklift	20	75
Gradall	40	83
Dump/Haul Truck	40	76
Excavator	40	81
Jackhammer	20	89
Man Lift	20	75
Grader	40	85
Rubber Tired Loader	40	79
Delivery Truck	40	74
Welders	40	74
Pneumatic Tool	50	85

Notes:

¹ Construction equipment noise levels are based on the FHWA RCNM and represent exterior noise measurements.

Source: FHWA Roadway Construction Noise Model User’s Guide. Table 1, 2006.

Table 4.9-6: Estimated Construction Noise Levels provides the Project’s estimated construction noise levels for various construction phases at the nearest offsite noise-sensitive receptors described in **Table 4.9-2**. For a conservative analysis, the estimated noise levels were calculated assuming all pieces of construction equipment for each construction phase are operating simultaneously and located at the construction area nearest the noise-sensitive receptors. These assumptions represent the worst-case noise scenario because construction activities would

³ Pursuant to the FHWA Roadway Construction Noise Model User’s Guide, 2005, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.



typically be spread out throughout the Project site, and, thus, some equipment would be farther away from the affected receptors.

As shown in **Table 4.9-6**, the Project’s estimated construction noise levels during demolition (i.e., the loudest construction phase) would range from 72.1 dBA (Leq) at receptor location R3 to 86.8 dBA (Leq) at receptor location R1. Pursuant to GMC §8.36.080, construction activities are exempt from the City’s noise standards, provided construction activities do not take place between 6:00 p.m. and 7:00 a.m. on weekdays, between 6:00 p.m. and 9:00 a.m. on Saturdays, or any time on Sundays and federal holidays. Project construction activities would be subject to compliance with GMC §8.36.080, thus, would not take place during the restricted days/hours. Therefore, the Project’s construction activities would be exempt from the City’s noise standards. Notwithstanding, the Project’s estimated construction noise levels have been conservatively analyzed, as discussed below.

Table 4.9-6: Estimated Construction Noise Levels

Receptor Location	Estimated Noise Levels by Construction Phase ¹ dBA (Leq) ²						Measured Ambient Noise Levels ²	Significance Threshold ³	Mitigated Noise Level ⁴
	Demolition	Grading	Site Preparation	Foundation Construction	Building Construction	Paving/Landscaping			
R1	86.8	86.7	83.0	83.5	85.3	85.1	49.0	59.0	74.8
R2	83.8	83.7	79.7	80.4	81.4	81.1	55.1	65.1	71.8
R3	72.1	71.9	67.6	68.4	68.0	67.4	69.9	79.9	60.1
R4	81.2	81.0	76.9	77.7	78.0	77.6	56.9	66.9	69.2
R5	84.6	84.5	80.7	81.3	82.5	82.2	54.8	64.8	72.6
R6	84.6	84.5	80.7	81.3	82.5	82.2	54.6	64.6	72.6
R7	81.2	81.0	76.9	77.7	78.0	77.6	56.9	66.9	69.2

Notes:
¹ Detailed calculation worksheets are included in **Appendix 4.9-1**.
² See **Table 4.9-5: Construction Equipment Noise Emission Reference Levels and Usage Factors**.
³ 10 dBA over ambient threshold.
⁴ With Mitigation Measure NOI-1: Construction Noise implemented.

Source: **Appendix 4.9-1**, Table 6.

As indicated in **Table 4.9-6**, the Project’s estimated construction noise levels would exceed the City’s significance thresholds at all noise-sensitive receptor locations except receptor location R3. To reduce the Project’s construction-related noise levels, implementation of Mitigation Measure (MM) MM NOI-1: Construction Equipment, which requires power construction equipment to be properly maintained and equipped with noise shielding and muffling devices, and MM NOI-2: Construction Noise, which requires that an impermeable sound barrier be constructed prior to any demolition/construction activities along the Project’s northern, southern, and western property lines and that these barriers remain for the duration of construction, are recommended. **Table 4.9-6** provides the estimated construction noise levels at the nearest offsite noise-sensitive receptors with MM NOI-1 and MM NOI-2 incorporated. As indicated in **Table 4.9-6**, despite MM NOI-1 and MM NOI-2 achieving an approximately 12-dBA attenuation (i.e., noise reduction),



construction noise levels at all six of the significantly-impacted noise-sensitive receptors (i.e., receptor locations R1, R2, R4, R5, R6, and R7) would continue to exceed the City's specified thresholds. As previously noted, GMC §8.36.080(G) exempts noise associated with construction activities provided it does not occur within restricted days and hours. Notwithstanding, given that construction-related noise levels would exceed the City's specified thresholds, and considering the proposed building height (seven stories at a maximum height of approximately 90 feet) and extended construction period (i.e., 3.5 years), it is conservatively concluded that the Project's construction-related noise levels would result in a significant unavoidable impact.

In addition to onsite construction noise sources, materials delivery, concrete mixing, and haul trucks (construction trucks), and construction worker vehicles would require access to the Project site during the Project construction period. The major noise sources associated with offsite construction trucks would be from haul trucks during the demolition and site grading/excavation (for import and export), which would require approximately 20 daily truck trips (10 incoming trips and 10 outgoing trips). Construction-related trucks would be fewer during other construction phases with up to 10 delivery truck trips per day. Therefore, the construction-related mobile-source noise analysis is based on the peak period with a maximum of 20 truck trips per day. Based on an eight-hour haul period and a uniform distribution of truck trips, there would be 3 truck trips per hour. Haul trucks would generally access the Project site via I-405 and South Normandie Avenue.

The offsite construction trucks would generate noise levels of approximately 54.7 dBA L_{eq} along Normandie Avenue between the Project site and I-405. The estimated noise from offsite construction trucks would be well below the existing ambient noise level of 69.9 dBA L_{eq} (measured at noise-sensitive receptor location R3) along Normandie Avenue. As such, the Project's offsite construction traffic would result in less than significant noise impacts.

OPERATIONS (NOISE)

The Project's operational noise sources would include: (a) onsite stationary noise sources, including outdoor mechanical equipment (e.g., heating/ventilation/air conditioning (HVAC) equipment), outdoor activities (i.e., use of dog run/park, courtyards, open spaces, pools, and open decks), parking facilities, trash compactor; and (b) offsite mobile (roadway traffic) noise sources.

Outdoor Mechanical Equipment

The Project would include new outdoor mechanical equipment (i.e., HVAC equipment), which would be located on the building roof levels. Project-related outdoor mechanical equipment would be required to comply with the GMC, which limits the noise from the mechanical equipment such that it does not exceed the City's exterior noise standards at the property lines of the nearest noise-sensitive receptors. As shown in **Table 4.9-7: Outdoor Mechanical Equipment Noise Levels**, the estimated mechanical equipment noise levels would range from 28.2 dBA (L_{eq}) at receptor location R5 to 34.1 dBA (L_{eq}) at receptor R1, which would be below the



City’s significance thresholds. Therefore, the Project’s mechanical equipment noise levels would result in a less than significant impact.

Table 4.9-7: Outdoor Mechanical Equipment Noise Levels

Receptor Location	Nighttime Hours Ambient Noise Levels ¹ dBA (L _{eq})	Estimated Noise from Project Mechanical Equipment ² dBA (L _{eq})	Significance Threshold ³ dBA (L _{eq})	Exceedance over Significance Threshold	Significant Impact?
R1	49.0	34.1	50.0	0.0	No
R2	53.8	29.7	53.8	0.0	No
R3	67.3	31.7	67.3	0.0	No
R4	56.4	28.3	56.4	0.0	No
R5	53.0	28.2	53.0	0.0	No
R6	48.7	29.3	50.0	0.0	No
R7	56.4	28.3	56.4	0.0	No

Notes:
¹ See **Table 4.9 1: Existing Ambient Noise Levels**.
² Noise levels associated with the Project outdoor mechanical equipment were calculated based on manufacturer’s published sound data for typical outdoor condenser units. Detailed calculation worksheets are included in **Appendix 4.9-1**.
³ Significance threshold is 50 dBA (Leq) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**, Table 7.

Outdoor Activities

The Project’s outdoor spaces would include several common areas where various outdoor activities would occur, as follows:

- Apartments: dog run, courtyard, and open spaces on Level 1; an outdoor pool and courtyards on Level 3; and an open deck on Level 7.
- Townhomes: swimming pool with BBQ and seating areas; dog park; club house; and paseos with seating areas.

Noise sources associated with the outdoor spaces typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces. The noise analysis assumed up to 1,352 people at apartment courtyards 1, 2, and 3, up to 151 people at the open spaces and dog park, and up to 130 people gathering at the apartment Level 7 outdoor deck based on 15 square feet per



person.^{4, 5} To analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. Noise levels associated with the dog run area were calculated based on measured noise levels from an existing dog park,⁶ which generated approximately 58.4 dBA (L_{eq}) at a distance of 25 feet.⁷

Table 4.9-8: Outdoor Activity Noise Levels presents the estimated noise levels at the offsite noise-sensitive receptors, resulting from use of outdoor spaces. The estimated noise levels were calculated with the assumption that the outdoor spaces would be fully occupied and operating concurrently to represent a worst-case noise analysis. As presented in **Table 4.9-8**, the estimated noise levels from the Project’s outdoor spaces would range from 28.8 dBA (L_{eq}) at receptor locations R4/R7 to 48.7 dBA (L_{eq}) at receptor location R3, which would be below the City’s significance thresholds. Therefore, the Project’s outdoor stationary noise source noise levels would result in a less than significant impact.

Table 4.9-8: Outdoor Activity Noise Levels

Receptor Location	Ambient Noise Levels ¹ dBA (L _{eq})	Estimated Noise from Project Outdoor Uses ² dBA (L _{eq})	Significance Threshold ³ dBA (L _{eq})	Exceed over Significance Threshold	Significant Impact?
R1	49.0	46.6	50.0	0.0	No
R2	53.8	37.7	53.8	0.0	No
R3	67.3	48.7	67.3	0.0	No
R4	56.4	28.8	56.4	0.0	No
R5	53.0	29.6	53.0	0.0	No
R6	48.7	30.0	50.0	0.0	No
R7	56.4	28.8	56.4	0.0	No

Notes:
¹ Based on City nighttime exterior noise limits.
² Detailed calculation worksheets are included in **Appendix 4.9-1**.
³ Significance threshold is 50 dBA (L_{eq}) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**. Table 8.

⁴ International Code Council. (2021). *2019 California Fire Code, Title 24, Part 9 with July 2021 Supplement*, Table 1004.5. Retrieved from: <https://codes.iccsafe.org/s/CFC2019P4/chapter-10-means-of-egress/CFC2019P4-Pt03-Ch10-Sec1004.5>, accessed May 2023.

⁵ It is noted, this is a very conservative assumption given the Project’s total population growth of 1,088 persons; see **Table 4.10-7: Existing Plus Project Growth Forecast**.

⁶ The measured noise levels provided in the referenced report are from an existing dog park with 5 to 11 dogs present in each of the small and large dog areas. The measured noise level is appropriate for the Project as the Project also includes areas for dogs. In addition, the reference noise level was adjusted up by 3.8 dBA to account for the maximum 19 dogs for the Project.

⁷ City of San Diego. (2019). *Noise Technical Report Beyer Community Park*.



Parking Facilities

Parking for the apartments would be provided within two above-grade parking levels, with a total of approximately 413⁸ parking spaces. In addition to the entrance/exit driveways at the north along South Normandie Avenue and east along West 170th Street, the parking garage includes natural ventilation along all facades. In addition, there would be five surface parking spaces at the east side of the apartment building along South Normandie Avenue. Townhome resident parking would be located in private garages for each unit. Any outdoor parking spaces would be minimal and dispersed throughout the townhome area. As indicated in **Table 4.9-9: Parking Facility Noise Levels**, the estimated noise levels from the Project’s parking facilities would range from 22.8 dBA (L_{eq}) at receptor location R2 to 43.9 dBA (L_{eq}) at receptor locations R4/R7, which would be below the City’s significance thresholds. Therefore, the Project’s parking facility noise levels would result in a less than significant impact.

Table 4.9-9: Parking Facility Noise Levels

Receptor Location	Ambient Noise Levels ¹ dBA (L _{eq})	Estimated Noise from Project Parking Uses ² dBA (L _{eq})	Significance Threshold ³ dBA (L _{eq})	Exceed over Significance Threshold	Significant Impact?
R1	49.0	23.7	50.0	0.0	No
R2	53.8	22.8	53.8	0.0	No
R3	67.3	40.0	67.3	0.0	No
R4	56.4	43.9	56.4	0.0	No
R5	53.0	30.2	53.0	0.0	No
R6	48.7	28.8	50.0	0.0	No
R7	56.4	43.9	56.4	0.0	No

Notes:
¹ Based on City nighttime exterior noise limits.
² Detailed calculation worksheets are included in **Appendix 4.9-1**.
³ Significance threshold is 50 dBA (L_{eq}) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**, Table 9.

Trash Compactor

The Project trash compactor would be located within an enclosed room inside Level 1 parking, at the apartment’s interior. The noise levels from the trash compactor operation would be effectively shielded to the offsite noise-sensitive receptor locations. Therefore, the Project’s trash compactor noise levels would be less than significant.

⁸ **Appendix 4.9-1** assumed 413 parking spaces; however, the Project site plan was subsequently revised to include only 399 parking spaces and therefore the report conservatively assumes noise impacts from parking facilities.



Offsite Mobile Roadway Traffic

The Project is expected to generate approximately 1,715 net daily trips; see **Appendix 4.13-1: CEQA Impact Transit Assessment**. Project-generated traffic noise impacts were evaluated by comparing the change in noise levels from the “existing” condition to the “existing plus project” condition with the significance threshold of a 3-dBA increase (i.e., “barely perceptible”). Traffic noise levels at the offsite noise-sensitive receptors were calculated using FHWA’s Traffic Noise Model and the Project’s traffic volume data. The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

As shown in **Table 4.9-10: Offsite Roadway Traffic Noise Impacts**, Project traffic would result in a maximum noise level increase of 1.8 dBA CNEL along West 170th Street (west of Normandie Avenue). In addition, the estimated noise level increases along Normandie Avenue and West 169th Street (west of Normandie Avenue) would be 0.2 dBA CNEL and 0.3 dBA CNEL, respectively. As previously noted, a 3-dBA increase is considered a “barely perceptible” difference (i.e., the change in noise is perceived but does not cause a human response). As such, the Project’s estimated traffic noise level increases are considered negligible. Therefore, the Project’s offsite traffic noise levels would result in a less than significant impact.

Table 4.9-10: Offsite Roadway Traffic Noise Impacts

Roadway Segment	Estimated Traffic Noise Levels ¹ CNEL		Increase in Noise Levels, CNEL	Significant Impact?
	Existing	Existing + Project		
South Normandie Avenue Between 169 th Street and 170 th Street	68.6	68.8	0.2	No
West 169 th Street West of Normandie Avenue	55.5	55.8	0.3	No
West 170 th Street West of Normandie Avenue	47.6	49.4	1.8	No
1 Detailed calculation worksheets, are included in Appendix 4.9-1 .				
Source: Appendix 4.9-1 . Table 10.				

Composite Noise Impacts from Project Operations

An evaluation of composite noise levels, including all Project-related noise sources, was conducted to identify the potential maximum Project-related noise level increase that could occur at the noise-sensitive receptor locations. The overall sound environment at the areas surrounding the Project site would include contributions from each onsite individual stationary noise source associated with typical daily Project operations. The Project’s principal onsite stationary noise sources would include mechanical equipment, parking facility, and outdoor uses. As indicated in **Table 4.9-11: Composite Noise Impacts**, the Project’s composite noise levels would range from 34.2 dBA at receptor locations R5/R6 to 49.3 dBA at receptor location R3,



which would be below the City’s significance thresholds. Therefore, the Project’s composite operational noise levels would result in a less than significant impact.

Table 4.9-11: Composite Noise Impacts

Receptor Location	Ambient Noise Levels ¹ dBA (L _{eq})	Calculated Project-Related Noise Levels, L _{eq} (dBA) ²			Project Composite Noise Levels, L _{eq} (dBA)	Significance Threshold, ³ dBA (L _{eq})	Significant Impact?
		Mechanical	Outdoor Uses	Parking			
R1	49.0	34.1	46.6	23.7	46.9	50.0	No
R2	53.8	29.7	37.7	22.8	38.5	53.8	No
R3	67.3	31.7	48.7	40.0	49.3	67.3	No
R4	56.4	28.3	28.8	43.9	44.1	56.4	No
R5	53.0	28.2	29.6	30.2	34.2	53.0	No
R6	48.7	29.3	30.0	28.8	34.2	75.0	No
R7	56.4	28.3	28.8	43.9	44.1	56.4	No

1. Based on City nighttime exterior noise limits.
2. Detailed calculation worksheets are included in **Appendix 4.9-1**.
3. Significance threshold is 50 dBA (Leq) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**, Table 11.

MITIGATION MEASURES

MM NOI-1 Construction Equipment Noise. Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures’ standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOI-2 Construction Noise. A temporary and impermeable sound barrier shall be provided along the Project northern, southern and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.



Impact 4.9-2:

Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?

Level of Significance: Less Than Significant Impact with Mitigation

CONSTRUCTION (VIBRATION)

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies, depending on soil type, ground strata, and construction characteristics of the receptor buildings.

The Project would generate ground-borne construction vibration forces during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozer/excavator and loaded trucks, would be used. The Federal Transit Administration (FTA) has published standard vibration velocities levels for various construction equipment operations (FTA, 2018). It is noted that Project construction would not use impact pile driving methods, therefore, impact pile driving vibration is not included in the onsite construction vibration analysis. As indicated in **Table 4.9-12: Construction Vibration Impacts – Human Annoyance**, the estimated vibration velocity levels from all construction equipment would be below the City's significance criteria of 80 VdB at all offsite vibration-sensitive receptors, except receptor location R1, where the estimated vibration level would be up to 87 VdB. Therefore, the Project's construction-related vibration levels, pursuant to the significance criteria for human annoyance, would be significant without mitigation. To reduce the Project's construction-related vibration impacts, implementation of MM NOI-3: Construction Vibration Impacts, which prohibits the use of large construction equipment greater than 400 horsepower or loaded trucks within 45 feet from receptor location R1 would be required. At this mitigated distance, the estimated vibration velocities at receptor location R1 would be 79 VdB, which would be below the 80 VdB significance threshold. Therefore, the Project's construction-related vibration levels, pursuant to the significance criteria for human annoyance, would be less than significant with mitigation incorporated.



Table 4.9-12: Construction Vibration Impacts – Human Annoyance

Receptor Location	Estimated Vibration Velocity Levels at the Offsite Vibration-Sensitive Receptors, VdB ¹				Significance Threshold ² VdB	Significant Impact?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	86	79	58	--	--
R1	87	86	79	58	80	Yes
R2	78	77	70	49	80	No
R3	68	67	60	39	80	No
R4	74	73	66	45	80	No
R5	79	78	71	50	80	No
R6	75	74	67	46	80	No
R7	74	73	66	45	80	No
¹ Vibration level calculated based on FTA reference vibration level at 25-foot distance.						
² Significance threshold is based on City vibration limit of 0.01 in/sec converted to VdB, $20 \cdot \log(0.01 \cdot 1,000,000)$.						
Source Appendix 4.9-1 Table 13.						

In addition, vibration impacts associated with potential building damage were analyzed at buildings nearest the Project site. The City currently does not have any adopted standards, guidelines, or thresholds relative to vibration impacts associated with building damage. Therefore, criteria from the FTA are used as the threshold to assess impacts associated with potential building damage. **Table 4.9-13: Construction Vibration Impacts – Building Damage** provides the estimated vibration levels at the nearest offsite buildings. As indicated in **Table 4.9-13** the estimated vibration velocity levels from construction equipment would be below the significance criteria at the nearest offsite buildings. Therefore, the Project’s construction-related vibration levels, pursuant to the significance criteria for building damage, would be less than significant.



Table 4.9-13: Construction Vibration Impacts – Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Offsite Buildings, PPV ¹				Significance Threshold VdB	Significant Impact?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.076	0.035	0.003	--	--
Single-story residential building to the North	0.019	0.016	0.008	0.001	0.2 ²	No
Single-story residential buildings to the South	0.024	0.020	0.009	0.001	0.2 ²	No
Single-story residential buildings to the East	0.010	0.008	0.004	0.001	0.2 ²	No
Single-story commercial buildings to West	0.089	0.076	0.035	0.003	0.2 ²	No
Single-story residential building adjacent to the Project site	0.156	0.133	0.061	0.005	0.2 ²	No

¹ Vibration level calculated based on FTA reference vibration level at 25-foot distance.

² FTA criteria for non-engineered timber and masonry buildings.

Source: Appendix 4.9-1. Table 12.

MITIGATION MEASURES

MM NOI-3 Construction Vibration Impacts. The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1)(16964 Brighton Avenue).

4.9.5 CUMULATIVE IMPACTS

For purposes of the noise and vibration impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. As indicated in **Table 3-1** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are two related projects within the geographic context for the cumulative noise and vibration analysis:

- **Related Project No. 2** is a condominium development approximately 720 feet northeast of the Project site and second nearest the Project site. There has been no recent action from the Applicant for this related project, with Plan Check Review anticipated to expire November 2023. Construction start date for this related project is unknown.
- **Related Project No. 3** is a small lot subdivision development approximately 400 feet northeast of the Project site. There has been no recent action from the Applicant for this



related project, and Plan Check Review has expired. Construction start date for this related project is unknown.

CONSTRUCTION (NOISE)

Proposed Project construction is scheduled to occur over approximately 3.5 years, beginning June 2024 and ending September 2027. As concluded above, construction activities are exempt from the City's noise standards, provided that construction activities do not take place between restricted days/hours (GMC §8.36.080). Because the Project would be subject to compliance with GMC §8.36.080, the Project's construction activities would be exempt from the City's noise standards. Notwithstanding, given that the Project's construction-related noise levels would exceed the City's specified thresholds, and considering the proposed building height (seven stories at a maximum height of approximately 90 feet) and extended construction period (i.e., 3.5 years), it is conservatively concluded that the Project's construction-related noise levels would result in a significant unavoidable impact.

Noise from construction of cumulative projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, as construction noise would be attenuated by distance and intervening buildings, typical in an urban setting. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located between the two construction sites. Although Related Project Nos. 2 and 3 are within the geographic context for the cumulative noise analysis, because there has been no recent action from either Applicant, the Plan Check Review has expired or is imminently set to expire (i.e., November 2023 for Related Project No. 2), and the construction start dates are unknown, these related projects have not been considered in this cumulative analysis. Further, it would be speculative to assume that construction activities for Related Project Nos. 2 and 3 would occur concurrent with the proposed Project's construction. Therefore, no cumulative construction-related noise impact would occur.

CONSTRUCTION (VIBRATION)

As concluded above, the Project would have a less than significant impact construction-related vibration impact. As discussed above, the nearest related project (Related Project No. 3) is approximately 400 feet northeast of the Project site, which would not contribute to the cumulative construction vibration impacts. Therefore, when combined with cumulative development, the Project's potential construction-related vibration impacts would not be cumulatively considerable.

OPERATIONS (NOISE)

As concluded above, the Project would have a less than significant impact related to operational noise. The Project along with overall development in the surrounding area would generate noise that would contribute to cumulative noise from a number of community noise sources including onsite mechanical/electrical equipment, parking facilities, loading/trash collections, and occupational activities (i.e., people and dog); and offsite mobile sources (i.e., traffic). The related



projects located within 1,000 feet of the Project site are residential, and these uses are not typically associated with excessive exterior noise levels.

Noise levels from stationary sources are presumed to be less than significant at the property line for each related project, given the related projects would be subject to the City's noise regulations that limit stationary noise sources, and site-specific mitigation measures would be identified, as needed. In addition, due to the distance attenuation and intervening structures (between the related projects and the proposed Project) and the Project's onsite stationary noise sources (i.e., building mechanical equipment, parking facility, loading/trash compactor, and outdoor sources), when combined with cumulative development, the Project's stationary source operational noise impacts would not be cumulatively considerable.

Traffic noise level is dependent on the traffic volume. That is, doubling the traffic volume would result in a 3 dBA noise increase (Project significance threshold). As analyzed above, the Project would result in a maximum 1.8 dBA increase in offsite traffic noise along West 170th Street, below the 3 dBA significance threshold. The traffic volume from the related projects would not double the existing traffic volume on West 170th Street, based on the relative location of the related projects to West 170th Street and estimated trip generation. Therefore, when combined with cumulative development, the Project's potential mobile source noise impacts would not be cumulatively considerable.

4.9.6 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project's construction activities would be exempt from the City's noise standards with certain restrictions pursuant to GMC §8.36.080. Notwithstanding, given that the Project's construction-related noise levels would exceed the City's specified thresholds, and considering the proposed building height and extended construction period, it is conservatively concluded that the Project's construction-related noise levels would result in a significant unavoidable impact, despite incorporation of MM NOI-1 and MM NOI-2.

4.9.7 REFERENCES

- Acoustical Engineering Services, Inc. (2023). *Noise Impact Study for 16911 Normandie Project*. Gardena, CA; see **Appendix 4.9-1**.
- California Department of Transportation. (2013a). *Technical Noise Supplement to the Traffic Noise Analysis Protocol*.
- Caltrans (2013b). *Transportation and Construction Vibration Guidance Manual*.
- Federal Highway Administration. (2006). *FHWA Roadway Construction Noise Model User's Guide*.
- Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment*.
- Harris, Cyril M. (1991). *Handbook of Acoustical Measurements and Noise Control*, Table 16.1.



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4.10 POPULATION AND HOUSING



4.10 POPULATION AND HOUSING

The purpose of this section is to describe the existing regulatory and environmental conditions related to the Project area’s population and housing and evaluate the Project’s potential to induce substantial unplanned population growth in the area. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project’s potentially significant impact.

The Project area’s demographics are examined in the context of existing and projected population, housing, and employment for the City of Gardena (City), the South Bay Region, and the County of Los Angeles (County). The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.

This section is based on the Gardena General Plan 2006 (GGP) Community Development and Housing Elements, California Department of Finance (DOF) Population and Housing Report E-5 2021-2023, 2010-2020 U.S. Census, Southern California Association of Governments (SCAG) Local Profiles Data 2019, and the SCAG Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – Demographics and Growth Forecast.

4.10.1 EXISTING SETTING

Population

Table 4.10-1: Population, 2023-2045, provides the DOF’s estimated 2023 County and City populations. The DOF estimates the County’s existing 2023 population is 9,761,210 persons and the City’s existing population is 59,809 persons. The DOF population estimates were derived by multiplying the number of occupied housing units by average persons per household.

Table 4.10-1: Population, 2023-2045

Jurisdiction	2023 ¹	2045 ²	Change
County of Los Angeles	9,761,210	11,674,000	+1,912,790 +16.4%
City of Gardena	59,809	65,700	+5,891 (+9.0%)
Sources: 1. State of California, Department of Finance (2023). <i>E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023</i> , Table 2: E-5 City/County Population and Housing Estimates. 2. Southern California Association of Governments. (2020). <i>Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report – Demographics and Growth Forecast</i> .			

Table 4.10-1 also provides SCAG’s forecast 2045 County and City populations, as presented in the RTP/SCS. The RTP/SCS provides population, household, and employment data for counties and



cities in the SCAG region for 2016 and 2045. SCAG’s forecasts are based on a jurisdiction’s existing land uses and General Plan land use designations. Population forecasts are calculated based on household growth and household size. The RTP/SCS forecasts that the County’s population will grow to approximately 11.7 million persons by 2045, representing an increase of approximately 16.4 percent between 2023 and 2045; see **Table 4.10-1**. The RTP/SCS also forecasts that the City’s population will grow to approximately 65,700 persons by 2045, representing an increase of approximately nine percent between 2023 and 2045; see **Table 4.10-1**. When compared to the County’s population growth rate, Gardena’s growth rate would be significantly less (approximately one-half).

Housing

Table 4.10-2: Dwelling Units and Households, 2023-2045, provides the DOF’s estimated 2023 County and City households (occupied dwelling units (DU)) and SCAG’s forecast 2045 households, as reported in the RTP/SCS. The DOF estimates the County’s and City’s existing 2023 households total 3,471,993 and 21,781, respectively. Comparatively, the City’s existing households are far less when compared to the County’s.

To further inform the nearby available housing, **Table 4.10-2**, also presents the dwelling unit and 2045 forecast households within the nearby South Bay Region.

Table 4.10-2: Dwelling Units and Households, 2023-2045

Jurisdiction	2023 ¹ (Dwelling Units)	2045 ^{2,3} (Households)	Change
County of Los Angeles	3,471,993	4,119,000	+647,007 +15.7%
South Bay Region ⁴	276,860	297,000	+20,140 +6.8%
City of Gardena	21,781	23,700	+1,919 +8.1%
<p>Notes:</p> <ol style="list-style-type: none"> Source: State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State</i>. Per SCAG Guidance, “household” refers to the number of occupied housing units while the DOF’s “household” population estimates are derived by multiplying the number of occupied housing units by the current persons per household. This analysis uses SCAG’s “household” methodology. State of California, Department of Finance (2023). <i>E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023, Table 2: E-5 City/County Population and Housing Estimates</i>. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance. 			

Table 4.10-3: Housing, 2023 provides the County’s, South Bay Regions', and City’s existing 2023 housing, housing types, vacancy rates, and average household size (persons per household) as reported by the DOF. The DOF estimates housing units by adding new construction and land annexations and subtracting housing that is removed (e.g., demolition) and adjusting for units lost or gained by conversions. Annual housing unit change data are supplied to the DOF by local



jurisdictions and the U.S. Census Bureau. As reported by the DOF, the vacancy rate is a measure of the availability of housing in a community. The vacancy rate also correlates the types of units available to the market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high supply of vacant units may indicate either the existence of a high number of desired units or an oversupply of units.

Table 4.10-3: Housing, 2023

Description	County of Los Angeles	South Bay Region ¹	City of Gardena
Single-Family Homes: Attached and Detached	2,004,733	169,145	11,975
Multi-Family Homes: Two to more than Five Units	1,603,151	113,827	9,437
Mobile Homes	56,298	6,483	1,212
Total Housing Units	3,664,182	289,455	22,624
Vacancy Rate	5.2%	4.6%	3.7%
Persons per Household ²	2.75	2.61	2.70
Note: 1. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance. 2. Persons per household estimates are derived by dividing the household population by the occupied housing units.			
Source: State of California, Department of Finance (2023). <i>E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023</i> , Table 2: E-5 City/County Population and Housing Estimates.			

As shown in **Table 4.10-3**, the DOF estimates that the County’s housing stock totals 3,664,182 DU, with a vacancy rate of 5.2 percent and an average of 2.75 persons per household. As also shown in **Table 4.10-3**, the DOF estimates that the City’s housing stock totals 22,624 DU, with a vacancy rate of 3.7 percent and an average of 2.70 persons per household. Refer to the *Regional Housing Needs Assessment Section* below for a discussion of the City’s future housing needs.

The RTP/SCS forecasts that the County’s households will grow to 4,119,000, an increase of approximately 15 percent between 2023 and 2045; see **Table 4.10-2**. Additionally, the RTP/SCS forecasts that the South Bay Region’s households will grow from to 297,000, an increase of approximately 6.8 percent between 2023 and 2045; see **Table 4.10-2**. The RTP/SCS also forecasts that the City’s households will grow to 23,700, an increase of approximately eight percent between 2023 and 2045; see **Table 4.10-2**. When compared to the South Bay Regions household growth rate, Gardena’s growth rate would be significantly higher.

Employment

As shown in **Table 4.10-4: Employment, 2019-2045**, the County's 2019 employment totaled 4,767,204 jobs and is forecast to grow to 5,382,000 jobs by 2045, representing an increase of approximately 11 percent between 2019 and 2045. The City’s 2019 employment totaled 29,405 jobs and is forecast to grow to 32,100 jobs by 2045, representing an increase of approximately eight percent between 2019 and 2045, see **Table 4.104**. Comparatively, the City’s employment



growth is forecast to be approximately three percent higher than the County’s. To further inform the employment that exists nearby, **Table 4.10-4** also presents the available employment in the nearby South Bay Region. The South Bay Regions’ 2019 employment totaled 418,617 jobs and is forecast to grow to 461,900 jobs by 2045, representing an increase of approximately nine percent between 2019 and 2045, see **Table 4.10-4**.

Table 4.10-4: Employment, 2019-2045

Jurisdiction	2019 ¹	2045 ²	Change
County of Los Angeles	4,767,204	5,382,000	+614,796 + 11.4%
South Bay Region ³	418,617	461,900	+43,283 +9.4%
City of Gardena	29,405	32,100	+2,695+8.4%
Sources: 1. SCAG, <i>SCAG Local Profiles Data 2019</i> , April 2021. 2. Southern California Association of Governments. (2020). <i>Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report – Demographics and Growth Forecast</i> . 3. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.			

Jobs to Housing Balance

The RTP/SCS states that the jobs to housing ratio is a “Comparison of median earnings for intra-county vs. intercounty commuters for each county; analysis of relative housing affordability and jobs throughout the region.”¹ The jobs to housing ratio is considered in balance when a subregion has enough employment opportunities for most people who live there and enough housing opportunities for most people who work there. The jobs to housing ratio is one indicator of a project’s effect on growth and quality of life in a project area. SCAG uses the jobs to housing ratio to assess the relationship between housing and employment growth. Further, the RTP/SCS states that “an imbalance between employment and housing in a community is a key contributor to local traffic congestion. These types of origin/destination disparities may also be considered an impediment to environmental justice”². According to SCAG, improvements in the balance of the jobs to housing ratio could result in a reduction to traffic congestion and related air quality problems. Communities with a jobs to housing ratio greater than 1.5 are considered “jobs rich” and those with a ratio less than 1.5 are considered “housing rich.”

Table 4.10-5: Jobs to Housing Ratio, provides the County’s jobs to housing ratio and indicates the County is considered “housing rich” with a ratio of 1.30, which is less than 1.5. **Table 4.10-5** also provides the City’s jobs to housing ratio and indicates the City is also considered “housing rich” with a ratio of 1.30, which is less than 1.5. **Table 4.10-5** also provides the South Bay Region’s jobs to housing ratio and indicates the South Bay is also considered “housing rich” with a ratio of

¹ Southern California Association of Governments. (2020). *Connect SoCal 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy Plan*, page 146.

² Southern California Association of Governments. (2020). *Connect SoCal 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy Plan*.



1.45, which is less than 1.5. However, the South Bay Region, while also considered housing rich, has an existing jobs-to-housing ratio that is higher than the City and County. Thus, the City would be providing housing that may be lacking in other areas of the South Bay Region where the jobs/housing ratio indicates a “jobs rich” community. Future predictions forecast the City gaining a higher proportion of jobs, but still remaining housing-rich, while the South Bay Region is forecast to gain a higher proportion of jobs to cross the threshold to be considered jobs rich. It is noted that despite the City’s existing jobs to housing ratio (i.e., being housing rich), SCAG’s RHNA allocated to the City 5,735 housing units for the 2021 – 2029 period; see the *Regional Housing Needs Assessment Section* below.

Table 4.10-5: Jobs to Housing Ratio

Jurisdiction	2022	2045 ¹
<i>County of Los Angeles</i>		
Jobs	4,767,204 ²	5,382,000
Housing Units ³	3,664,182 ^{4,5}	4,119,000
County Jobs/Housing Ratio	1.30	1.31
<i>South Bay Region⁵</i>		
Jobs	418,617 ²	461,900
Housing Units ³	289,455 ^{4,5}	297,000
South Bay Region Jobs/Housing Ratio	1.45	1.56
<i>City of Gardena</i>		
Jobs	29,405 ²	32,100
Housing Units ³	22,624 ^{4,5}	23,700
City Jobs/Housing Ratio	1.30	1.35
Sources:		
1. Southern California Association of Governments. (2020). <i>Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report – Demographics and Growth Forecast</i> .		
2. SCAG, <i>SCAG Local Profiles Data 2019</i> , April 2021.		
3. Per SCAG Guidance, “household” refers to the number of occupied housing units while the DOF’s “household” population estimates are derived by multiplying the number of occupied housing units by the current persons per household. This analysis uses SCAG’s “household” methodology.		
4. State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State</i> .		
5. See Table 4.10-2 and Table 4.10-4 , above.		
6. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.		

4.10.2 REGULATORY SETTING

State

California State Housing Law

California State Housing Law (California Government Code [CGC] Article 10.6) establishes the requirements for the Housing Element of the General Plan, one of the seven mandatory General



Plan Elements. The General Plan 2006 (GGP) is the City's General Plan which will guide the physical development in the City for the next 15-20 years. State law requires that Housing Elements identify and analyze existing and projected housing needs and provide goals, policies, objectives, financial resources, and programs for the preservation, improvement, and development of housing (CGC §65580). The City's Housing Element identifies strategies and programs that focus on the following: 1) preserving and improving housing and neighborhood; 2) Providing adequate housing sites; 3) Assisting in the provision of affordable housing; 4) Removing governmental and other constraints to housing investment; 5) Promoting fair and equal housing opportunities; and 6) Promoting sustainable housing. The California Legislature has determined that one of the State's primary housing goals is to ensure every resident has a decent home and suitable living environment.

California Government Code §65588 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years. For each review cycle, the California Department of Housing and Community Development (HCD) conducts a RHNA.

California Government Code §65583 sets forth the specific housing element content requirements. Included in these requirements are a jurisdiction's obligations to provide their "fair share" of regional housing needs; see *Regional Housing Needs Assessment Section* below.

Regional and local

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Agency established under §6502 et seq. of the California Government Code. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency, and a Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial Counties. The region encompasses a population exceeding 18 million persons in an area that encompasses more than 38,000 square miles. As the designated MPO, SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts for local governments. Gardena is a member of the South Bay Cities COG, one of the SCAG region's 14 subregional organizations.

SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of anticipated growth in the region. In September 2020, SCAG adopted Connect SoCal, its RTP/SCS for 2020-2045. Major themes in the RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increase capacity through improved systems managements; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth and opportunity; promoting the links between public health, environmental protection and economic



opportunity; and incorporating the principles of social equity and environmental justice into the plan.

Connect SoCal includes a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans, policies, and assumptions. SCAG utilizes Connect SoCal's (Transportation Analysis Zone) TAZ-level growth projections for regional modeling purposes and the projections are not adopted as part of Connect SoCal nor included as part of the Forecasted Regional Development Pattern. The growth forecasts do not affect a local jurisdiction's authority or decision on future development projects or plans. When adopting Connect SoCal, SCAG recognized that cities and counties would foreseeably update their housing elements as part of General Plans and amend zoning to accommodate the 6th Cycle RHNA. For many cities and counties, SCAG acknowledged that the required RHNA and Housing Element may need to accommodate more housing units than reflected in Connect SoCal's household and population growth projections for the jurisdictions.

Regional Housing Needs Assessment

The RHNA is a process performed periodically as part of the General Plan Housing Element updates at the local level. The RHNA process begins with the California Department of Housing and Community Development's forecast of future statewide housing growth need, and the apportionment of this need to regional councils of governments throughout the State. SCAG is the agency responsible for developing an allocation methodology to allocate the region's assigned share of statewide need to cities and counties by income level.

This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of its resident population, as well as the jurisdiction's projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that need to be added to compensate for anticipated demolitions and changes to achieve an ideal vacancy rate. SCAG defines a "household" as an occupied DU.

The 6th RHNA cycle covers the planning period from October 2021 to October 2029. The housing construction need is determined for four broad household income categories: very low (households making less than 50 percent of area median income), low (50 to 80 percent of area median income), moderate (80 to 120 percent of area median income), and above moderate (more than 120 percent of area median income). The intent of the future needs allocation by income groups is to relieve the undue concentrations of very low-income and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner. **Table 4.10-6: City of Gardena RHNA Allocation** outlines the City's RHNA allocation for the October 2021 through October 2029 period (i.e., 6th Cycle). As shown in **Table 4.10-6**, the City's RHNA allocation totals 5,735 DU, with 26 percent designated for very low income, 13 percent for low income, 16 percent for moderate income, and 45 percent for above moderate income. The



City is required to ensure that sufficient sites that are planned and zoned for housing are available to accommodate its need and to implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs.

Table 4.10-6: City of Gardena RHNA Allocation

Income Level	Percent of AMI ¹	Target (Units)	Percent
Very Low	0-50%	1,485	26%
Low	51-80%	761	13%
Moderate	81-120%	894	16%
Above Moderate	120%+	2,595	45%
Total		5,735	100%
Notes: ¹ AMI = Area Median Income			
Source: Southern California Association of Governments. (2021). SCAG 6 th Cycle Final RHNA Allocation. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785 , accessed May 2023.			

Gardena General Plan 2006

The City adopted the comprehensive Gardena 2006 General Plan (GGP) in 2006. The GGP constitutes the City’s overall plans, goals, and objectives for land use within the City’s jurisdiction. The GGP Community Development Element provides a Land Use Plan with goals and policies associated with housing. The Land Use Plan has been updated several times since its adoption, with the most recent amendment in February 2023. The following goals and policies are applicable to the Project:

- **LU Goal 1:** Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high quality housing types in the City.
 - **Policy LU 1.1:** Promote sound housing and attractive and safe residential neighborhoods.
 - **Policy LU 1.2:** Protect existing sound residential neighborhoods from incompatible uses and development.
 - **Policy LU 1.4:** Locate new medium- and high-density residential developments near neighborhood and community shopping centers with commensurate high levels of community services and facilities.
 - **Policy LU 1.5:** Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multifamily residential developments.
 - **Policy LU 1.6:** Ensure residential densities are compatible with available public service and infrastructure systems.
 - **Policy LU 1.8:** Minimize through-traffic on residential streets.



The GGP Housing Element provides the following goals and policies for the treatment of housing:

- **Goal 3.0:** Minimize the impact of governmental constraints on housing construction and cost.
 - **Policy 3.3:** Encourage the use of specific plans, overlays, and other mechanisms to allow flexibility in housing developments.
- **Goal 4.0:** Provide adequate residential sites through appropriate land use and zoning to accommodate the City’s share of regional housing needs.
 - **Policy 4.1:** Implement land use policies that allow for a range of residential densities.
 - **Policy 4.3:** Encourage residential development within the new Housing Overlay.
 - **Policy 4.5:** Ensure the production of affordable units throughout the community to avoid over concentration in specific neighborhoods.
 - **Policy 4.6:** Facilitate the development of mixed income projects.
- **Goal 5.0:** Promote equal opportunity for all residents to reside in the housing of their choice.
 - **Policy 5.2:** Provide a range of housing options, locational choices, and price points to accommodate the diverse needs in Gardena and to allow for housing mobility.

4.10.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning population and housing. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) (see **Impact 4.10-1**).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (see **Section 7.0: Effects Found Not to be Significant**).

4.10.4 IMPACTS AND MITIGATION MEASURES

Impact 4.10-1:

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

Level of Significance: Less Than Significant Impact



The Project proposes to remove all existing onsite structures and, in their place, construct a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northeastern portion; and 75 townhome-style units within nine buildings at the Project site's southern portion and along the western site boundary; see **Exhibit 2-4: Conceptual Site Plan**. **Table 2-4: Land Use Summary – Proposed Apartment Building** summarizes the apartment building's proposed floor areas and various proposed apartment product types (i.e., 68 studio, 194 one-bedroom, and 66 two-bedroom). **Table 2-5: Land Use Summary – Proposed Townhomes** summarizes the townhome proposed floor areas and the various proposed townhome product types (i.e., 30 two-bedroom, 35 three-bedroom, and 10 four-bedroom). Additionally, the Project's Development Agreement (DA #2-21) would guarantee the City five percent (or 20 DU) affordable housing units for a period of 55 years.

The Project proposes 403 DU, thus, would induce population growth in the City directly through housing development. However, as concluded below, the Project's forecast population growth is not considered substantial. Additionally, the Project does not propose to extend roads or other infrastructure, thus, would not induce population growth in the City indirectly.

Existing Plus Project Conditions

As previously noted, the Project is a residential development, thus, would induce population growth in the City directly through new housing. **Table 4.10-7: Existing Plus Project Growth Forecast**, compares the Project's estimated population growth to existing 2023 population. As indicated in **Table 4.10-7**, the Project's forecast population growth of 1,088 persons is estimated to increase the City's existing 2023 population to 60,897 persons, representing an approximately 1.8 percent increase in population.



Table 4.10-7: Existing Plus Project Growth Forecast

Description	Housing (Dwelling Units)	Population (Persons)
City's 2022 Existing Conditions ¹	22,264	59,809
Proposed Project	403	1,088 ²
Existing + Project	22,184	60,897
Percent Change from Existing	+1.8%	+1.7%
Notes: 1. State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.</i> 2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household (State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.</i>).		

General Plan Plus Project Conditions

The General Plan, which was adopted in 2006 and most recently updated in 2022, contains the City's housing and population forecasts at buildout in 2026.³ **Table 4.10-8: General Plan Buildout Plus Project Growth Forecasts** presents the City's forecast housing capacity at buildout as 22,329 DU, with a forecast population of 63,799 persons. As indicated in **Table 4.10-8**, although the City's existing housing stock of 22,624 DU has exceeded the City's forecast housing capacity at buildout by approximately 295 DU, the City's existing population of 59,809 persons is approximately 3,990 persons less than the City's forecast population at buildout of approximately 63,799 persons.

The Project would require a General Plan amendment, zone change, as well as an adoption of a specific plan, to allow for development of up to 403 DUs on the Project site. However, given the Project site's existing land use designation (i.e., Housing Overlay 4 (HO-4) on the northerly portion (approximately 1.32 acres), some of the Project's forecast population growth was planned. As indicated in **Table 4.8-2: Existing General Plan Land Use Designations**, the Project site's maximum development capacity, based on the existing land use designations, is 40 DU (on the northerly portion) and/or approximately 228,690 SF of industrial floor area throughout the site. Therefore, approximately 10 percent of the Project's 403 proposed DU was previously planned. **Table 4.10-8** also presents the City's forecast housing capacity at buildout as 22,329 DU, with a population of 63,799 persons. **Table 4.10-8** also compares the Project's estimated population growth of 1,088 persons to the General Plan's forecast population at buildout.

³ City of Gardena. (2006). City of Gardena General Plan 2006 – Final Environmental Impact Report, Table 2 – Residential Capacity and Table 3 – Commercial, Industrial and Public Use Capacity.



Table 4.10-8: General Plan Buildout Plus Project Growth Forecasts

Description	Housing (Dwelling Units)	Population (Persons)
City’s 2023 Existing Conditions ¹	21,781	59,809
2026 Forecast General Plan Buildout ¹	22,329	63,799
Proposed Project	+403	+1,088 ²
Previously Planned Residential ³	-40	-108 ⁴
Proposed Net Project	+363	+980
2026 General Plan Plus Project	22,692	64,779
General Plan Plus Project % Change	+1.6%	+1.5%
Notes: 1. City of Gardena. (2006). <i>City of Gardena General Plan 2006 Draft EIR Table 2: Residential Capacity</i> . Gardena, CA. 2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household (State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.</i>). 3. See Table 4.8-2: Existing General Plan Land Use Designations . 4. Based on 40 DU, 100 percent occupancy, and 2.70 persons per household (State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.</i>).		

As indicated in **Table 4.10-8**, when accounting for the previously planned 40 DU, the Project’s proposed net residential development of 363 DU would increase the General Plan’s forecast population at buildout by approximately 1.6 percent (980 persons). Therefore, the Project would induce unplanned population growth in the City directly through new housing based on General Plan buildout. However, the Project’s forecast net population growth of 980 persons is not considered substantial based on the following factors:

- It would constitute a nominal 1.6percent increase over the forecast population at buildout;
- As indicated in **Table 4.10-1**, the City’s existing population of 59,809 persons is approximately 3,990 persons less than the City’s forecast population at buildout of approximately 63,799 persons. Thus, the Project would be well within the City’s forecast population growth of 3,990 persons between 2023 existing conditions and buildout; and
- The GGP 6th Cycle Housing Element includes a housing needs assessment in which it outlines local and regional conditions that are limiting housing production. These conditions include:
 - New housing is needed as regional employment and population growth generate a demand for new housing throughout Southern California.
 - New housing is needed as Gardena’s current population increases and ages.
 - New construction housing is needed as most of Gardena’s existing multi-family residential uses (i.e., apartment units) are older housing stock that do not provide the types of amenities that renters are currently seeking.
 - New housing is needed when vacancy rates are low to ensure reasonable levels of choice and mobility in the marketplace.



As shown in **Table 4.10-6**, the City's RHNA allocation totals 5,735 DU, of which 2,246 are designated for low/very low-income. The Project would provide approximately 7.0 percent of the City's total RHNA allocation. Additionally, the Development Agreement (DA #2-21) would guarantee the City five percent (or 20 DU) affordable housing units, which would be in furtherance of the City meeting their 6th Cycle RHNA allocation of 2,246 low/very low-income units.

Additionally, the Project would be in furtherance of various GGP goals. It is the City's goal (GGP Land Use Goal 1) to "preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City." The Project would further this goal by converting an industrial site into a residential one, which would contribute additional housing types in the City. Additionally, the Project would be in furtherance of meeting various GGP Housing Element Policies. GGP Housing Element Goal 3 which aims to "minimize the impact of governmental constraints on housing construction and cost" by "encouraging the use of special development zones and other mechanism to allow more flexibility in housing developments." GGP Housing Element Goal 4 states "provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs" by implementing land use policies which allow for a range of residential densities, encouraging development within the new Housing Overlay, especially production of affordable housing, and to facilitate development of mixed income projects. Additionally, GGP Housing Element Goal 5 states "promote equal opportunity for all residents to reside in the housing of their choice" by providing "a range of housing options, locational choices, and price points to accommodate the diverse needs in Gardena and to allow for housing mobility." See **Table 4.9-1: General Plan Consistency Analysis**, which provides a consistency analysis of the Project to the applicable GGP policies.

Therefore, although the Project would induce unplanned population growth in the City based on General Plan forecasts, the Project's population growth is not considered substantial given the factors discussed above. A less than significant impact would occur in this regard, and no mitigation is required.

SCAG RTP/SCS Plus Project Conditions

SCAG's RTP/SCS forecasts the City's population will increase by approximately 5,891 persons, or approximately 9.0 percent between 2023 and 2045; see **Table 4.10-2**. Similarly, SCAG's RTP/SCS forecasts the City's households will increase by approximately 1,919 households, or approximately 8.1 percent between 2023 and 2045. SCAG's RTP/SCS assumes 23,700 households in the City by 2045, with a population of 65,700 persons. **Table 4.10-9: SCAG RTP/SCS 2045 Plus Project Growth Forecast** evaluates the Project's contribution to 2045 growth forecasts. As indicated in **Table 4.10-9**, the Project's proposed residential development would increase the RTP/SCS' forecast 2045 population by approximately 1.6 percent (1,088 persons).



Table 4.10-9: SCAG RTP/SCS 2045 Plus Project Growth Forecast

Description	Households/Housing (Dwelling Units)	Population (Persons)
2045 Forecast RTP/SCS ¹	23,700	65,700
Proposed Project	+403	+1,088 ²
2045 Forecast RTP/SCS Plus Project	24,103	66,788
2045 Forecast RTP/SCS Plus Project % Change	1.7%	1.6%
Notes:		
1. Southern California Association of Governments. (2021). SCAG 6 th Cycle Final RHNA Allocation. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785 , accessed May 2023.		
2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household (State of California, Department of Finance. (2022). <i>2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.</i>).		

The Project exceeds the 2045 RTP/SCS households and population growth projection estimates and would induce unplanned population growth directly. The RTP/SCS Growth Forecast is determined on the GGP land use designations and their potential for residential development within the City. The RTP/SCS was adopted prior to the adoption of the 2021 to 2029 Housing Element and RHNA Allocations, and the recently adopted Housing Element and land use designations have not been included in the RTP/SCS forecast. Therefore, the Project would induce unplanned population growth in the City directly through new housing based on 2045 RTP/SCS forecasts. However, the Project’s forecast net population growth of 1,088 persons is not considered substantial concerning the RTP/SCS based on the following factors:

- It would constitute a nominal 1.6 percent increase over the forecast population in 2045;
- The Project site is partially within a Housing Overlay Area and was envisioned to be redeveloped from Industrial to Residential land uses with adoption of the 2021 Housing Element; and
- The Project would help the City meet its RHNA Allocation, including its low-income units.

As previously discussed, communities with more than 1.5 jobs per DU are considered “jobs rich” and those with fewer than 1.5 jobs per DU are considered “housing rich.” The City’s existing jobs-to-housing ratio of 1.30 indicates the City is currently housing rich. Inclusive of the Project’s proposed 403 DU, the City’s jobs-to-housing ratio would decrease from 1.30 to 1.28, indicating the City would continue to be housing rich. The City’s employment is forecast to increase by 8.4 percent between 2019 and 2045. The City’s jobs-to-housing ratio is also forecast to increase from 1.30 to 1.35 between 2023 and 2045. Comparatively, **Table 4.10-5** indicates the South Bay Region is also considered “housing rich” with a ratio of 1.45. Future predictions forecast the City gaining a higher proportion of jobs, but remaining housing-rich, while the South Bay Region is forecast to gain a higher proportion of jobs to cross the threshold and be considered jobs rich. Thus, the City would be providing housing that may be lacking in other areas of the South Bay Region where the jobs/housing ratio indicates a “jobs rich” community. Additionally, by providing multi-family housing with amenities, the Project would encourage job growth in the area as employers look



to housing opportunities in developing areas to attract potential employees. Therefore, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.10.5 CUMULATIVE IMPACTS

Potential cumulative population and housing impacts are assessed relative to the GGP and regional plans, including SCAG’s RTP/SCS population, housing and employment projections. SCAG’s regional growth projections reflect recent and past trends, key demographic and economic assumptions and include local and regional policies. Local jurisdictions participate in the growth forecast development process.

As discussed above, the Project proposes 403 DU, which are forecast to increase the City’s population by approximately 1,088 persons (approximately 1.8 percent growth over existing conditions). As concluded above, the Project’s increase in dwelling units is within the RTP/SCS forecast values and would not exceed the estimated growth. The Project’s forecast population of 1,088 persons is within the City’s forecasted population growth and the additional housing would help the City meet its RHNA allocation. As indicated in **Table 4.10-10: Existing Plus Cumulative Growth Forecast**, the cumulative forecast population growth (proposed Project combined with the related projects) is 4,955 persons, or 8.3 percent over the City’s existing population of 59,809 persons.

Table 4.10-10: Existing Plus Cumulative Growth Forecast

Description	Housing Units	Persons per Household	Population
Existing 2022 ¹	22,623	2.7 ¹	59,809
Proposed Project	403		1,088 ²
Related Projects	1,432 ³		3,866 ²
Cumulative (Project + Related Projects ⁶)	1,835		4,955
Existing 2023 + Cumulative	24,458	--	64,764
Existing 2023 Plus Cumulative % Change	8.1%	--	8.3%
Notes: 1. State of California, Department of Finance (2023). <i>E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023</i> , Table 2: E-5 City/County Population and Housing Estimates. 2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household. 3. See Table 3-1: List of Cumulative Projects .			

As indicated in **Table 4.10-11: SCAG RTP/SCS 2045 Plus Cumulative Growth Forecast**, the cumulative forecast population growth (proposed Project combined with the related projects) is 4,955 persons, or 8.3 percent over SCAG’s forecast 2045 population for the City of 65,700



persons. Note this conservatively assumes that all related projects are not already accounted for in the existing adopted General Plan, which is the basis for SCAG’s forecasts. Therefore, the Project and other cumulative projects would induce growth which is not accounted for in SCAG forecasts. However, as shown in **Table 4.10-6**, the City’s RHNA allocation totals 5,735 DU. Cumulative development of 1,835 DU would provide approximately 32 percent of the City’s total RHNA allocation. However, the RTP/SCS was adopted prior to the adoption of the 2021 to 2029 Housing Element and RHNA Allocations, and the recently adopted Housing Element and land use designations have not been included in the RTP/SCS forecast. As such, cumulative development would induce unplanned population growth in the City directly through new housing based on 2045 RTP/SCS forecasts. However, the cumulative forecast population growth is not considered substantial. Cumulative development would be subject to compliance with GGP Land Use Goals and the City’s Housing Element, which identifies the need for new housing to meet demands throughout southern California and specifically within the City, to account for a growing and aging population, replacement of older housing stock, and to ensure reasonable levels of choice and mobility in the marketplace.

The related projects would also be subject to project-level review and project-specific measures would be required, as needed, to reduce significant impacts. Given the Project’s consistency, as well as the potential for other related projects to be generally consistent with the population and housing policies. Therefore, when combined with cumulative development, the Project’s impacts concerning unplanned population growth would not be cumulatively considerable.

Table 4.10-11: SCAG RTP/SCS 2045 Plus Cumulative Growth Forecast

Description	Households/Housing (Dwelling Units)	Population (Persons)
2045 Forecast RTP/SCS ¹	23,700	65,700
Cumulative (Project + Related Projects) ²	1,835	4,955
2045 Forecast RTP/SCS Plus Cumulative	25,535	70,655
2045 Forecast RTP/SCS Plus Cumulative % Change	+7.7%	+7.5%
Notes: 1. Southern California Association of Governments (2020). <i>Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy</i> . 2. See Table 4.10-10 .		

4.10.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning population and housing have been identified.

4.10.7 REFERENCES

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An architectural rendering of a modern, multi-story apartment building. The building features a central courtyard with a swimming pool, lounge chairs, and a glass-enclosed walkway. The architecture is contemporary, with large windows and balconies. The scene is set in a city environment with other buildings visible in the background.

4.11 PUBLIC SERVICES



4.11 PUBLIC SERVICES

This section analyzes the Project’s potential to 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 for any of the public services (i.e., fire protection, police protection, schools, and other (e.g., library) public facilities). Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project’s potentially significant environmental impacts.

Information in this section is based on readily available public resources.

4.11.1 EXISTING SETTING

Regional Setting

Fire Protection

The City contracts with Los Angeles County Fire Department (LACFD) to provide fire protection and emergency medical services. The LACFD protects 4.1 million residents in 60 cities and unincorporated County of Los Angeles (County) areas.¹ The LACFD is responsible for fire response, vehicle accidents, public assistance, medical emergencies, water rescue, and hazardous materials response.

Table 4.11-1: Fire Stations Serving the Project Site presents the two LACFD fire stations within the City that would serve the Project site, as well as their locations and distances from the Project site. The fire station nearest the Project site is Fire Station 158, which is approximately 0.9-mile northwest of the Project site.

Table 4.11-1: Fire Stations Serving the Project Site

Station Number	Address	Distance From Project Site (miles)
Fire Station 158	1650 West 162 nd Street Gardena, CA 90247	0.9
Fire Station 159	2030 West 135 th Street Gardena, CA 90249	3.1

Source: County of Los Angeles Fire Department. (No Date). *Fire Station Locator*. Retrieved from: <https://locator.lacounty.gov/fire>, accessed May 2023.

¹ County of Los Angeles Fire Department. (2021). *Annual Report*. https://fire.lacounty.gov/wp-content/uploads/2022/08/LACoFD-2020-Annual-Report_Final_081722.pdf. Accessed on September 30, 2022.



Police Protection

Police protection services to the Project site are provided by the Gardena Police Department (GPD). The GPD employs a personnel force of 120 employees, 88 of which are sworn police officers.² The GPD station nearest the Project site is at 1718 West 162nd Street, approximately 0.9 mile to the northwest.

Schools

The Project site is within the Los Angeles Unified School District (LAUSD) boundaries.³ **Table 4.11-2: LAUSD School Facilities**, lists the public schools that serve the Project site, as well as their existing capacity and enrollment. There are also private schools serving Kindergarten through 12th grades in the Project area.

Table 4.11-2: LAUSD School Facilities

School ¹	Capacity ²	Enrollment (2020-2021) ³	Available Capacity
Denker Avenue Elementary School (K-5)	826	700 ²	126
Robert E. Peary Middle School (6-8)	1,376	1,217	159
Gardena Senior High School (9-12)	1,496	1,490	6
<p>Note: Capacity is based on 2018-2019 enrollment.</p> <p>Sources: ¹ Los Angeles Unified Schools District. (No Date). <i>Resident School Identifier</i>. Retrieved from Resident School Identifier (lausd.net) e, accessed May 2023. ² California Department of Education. (2023). School Accountability Report Card; Reported Using Data from the 2020-2021 School Year. Retrieved from: https://www.cde.ca.gov/ta/ac/sa/, accessed July 2023.³ California Department of Education. (2021). <i>School Accountability Report Card</i>, Retrieved from: https://sarconline.org/public/findASarc, accessed August 2023.</p>			

Other Public Facilities

The Project site is within the Los Angeles County Library service area. Los Angeles County Library operates 84 community-based library outlets, including four cultural resource centers and four bookmobiles in 51 of 88 cities and unincorporated areas.⁴ Los Angeles County Library is responsible for maintenance and library improvements to meet library service demands. County Library’s Strategic Plan identifies goals and objectives including financial management and fundraising strategies to maintain and enhance library facilities to meet future demands. The library nearest the Project site is the Gardena Mayme Dear Library located at 1731 West Gardena Boulevard, approximately 0.8 mile to the northwest.

² Gardena Police Department. (2022). History of Gardena Police Department. Retrieved from: <http://www.gardenapd.org/history/>, accessed May 2023.

³ Great Schools. (No Date). See What School District You Are In. Retrieved from: <https://www.greatschools.org/school-district-boundaries-map/>, accessed May 2023.

⁴ Los Angeles County Library. (2020). Library Locator. Retrieved from: <https://lacountylibrary.org/library-locator/>, accessed May 2023.



4.11.2 REGULATORY SETTING

State

California Code of Regulations Title 24 (California Building Standards Code)

CCR Title 24, also known as the California Building Standards Code (CBSC), includes regulations for how buildings are designed and constructed, and are intended to ensure the maximum structural integrity and safety of private and public buildings. The CBSC, which applies to all applications for building permits, consists of 12 parts that contain CBSC administrative regulations for all State agencies that implement or enforce building standards. Local agencies must ensure the development complies with the CBSC standards. Cities and counties can adopt additional standards beyond the CBSC including CBSC Part 2, named the California Building Code (CBC), which is based upon the 2020 International Building Code, and CBSC Part 11, named the California Green Building Standards Code, also known as the CalGreen Code.

California Code of Regulations Title 24 Part 2 - California Building Code

The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment.

California Code of Regulations Title 24 Part 9 - California Fire Code

The California Fire Code (CFC) contains regulations consistent with nationally recognized accepted practices for safeguarding, to a reasonable degree, life and property from various hazards, including fire and explosion, among others. The CFC also contains provisions to assist emergency response personnel. The CFC is pre-assembled with the International Fire Code with necessary California amendments. The CFC is based on the 2021 adoption of the International Fire Code and integrates State amendments. The CFC contains fire safety-related building standards that are referenced in other parts of CCR Title 24. The CFC is updated once every three years; the 2022CFC took effect on January 1, 2023. The CFC sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. The CFC provides minimum standards to increase the ability of a building or structure to resist the intrusion of flame or burning embers being projected by a vegetation fire and contributes to a systematic reduction in fire losses through the use of performance and prescriptive requirements.



Assembly Bill 2926: Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential, commercial, and industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added §66000 et seq. to the Government Code. Under this statute, payment of school impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

Senate Bill 50

Senate Bill (SB) 50 (1998), which is funded by Proposition 1A, limits the power of cities and counties to require mitigation of developers as a condition of approving new development and provides instead for a standardized fee. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

Local

2023 Los Angeles County Fire Code – Title 32

According to Los Angeles County Fire Code §101.3: Intent, this code's purpose is to establish the minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures, and premises. It also provides a reasonable level of safety to firefighters and emergency responders during emergency operations. This code establishes regulations affecting or relating to structures, processes, premises, and safeguards regarding, but not limited to, fire hydrant systems, water supply, fire equipment access, and posting of fire equipment access. The City of Gardena has adopted the Los Angeles Fire Code.

Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) Community Safety Element provides a Public Safety Plan with the following goals and policies concerning public services:

- **PS Goal 1:** Maintain a high level of fire and police protection for residents, businesses, and visitors.
 - **Policy PS 1.6:** Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.



- **PS Goal 4:** Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.
 - **Policy PS 4.3:** Promote professional management of multi-family residential buildings.

Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 15.48 - Construction and Development Fees. This section outlines the development impact fees for multi-unit residential developments. These fees are imposed because “development and construction of new residential living units within the City creates an immediate and present danger to the existing quality of life and the ecology of the City and threatens to burden and overtax the existing public purposes of the City, such as the provisions of public services, utilities, water and drainage and the treatment and disposal of sanitary sewerage which affects the health, welfare, and safety of the community.” All proceeds from the fees collected under this chapter are applied to the costs incurred by the City associated with the burden increased by the multi-unit residential facilities, open space, drainage and other public facilities and services related thereto.

4.11.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to public services. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant environmental impact if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire Protection (see Impact 4.11-1),
 - Police Protection (see Impact 4.11-2),
 - Schools (see Impact 4.11-3),
 - Parks (see **Section 4.12: Recreation**), and
 - Other Public Facilities (see Impact 4.11-4).



4.11.4 IMPACTS AND MITIGATION MEASURES

Impact 4.11-1:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Level of Significance: Less Than Significant Impact

The LACFD operates two fire stations in the City, but the fire station nearest the Project site is Station 158, which is approximately 0.9-mile northwest of the Project site.

The Project proposes a multi-family residential development comprised of a 328-unit apartment building and 75 townhome style units to replace the existing approximately 115,424 square feet (SF) of industrial buildings onsite. As concluded in **Section 4.10: Population and Housing**, the Project's forecast population growth is approximately 1,088 persons. The Project's forecast population growth would incrementally increase the demand for fire protection and emergency medical services to the Project site. However, because the Project site is currently served by fire protection services and is located in a suburban setting where fire protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered fire protection facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of fire protection facilities. A less than significant impact would occur in this regard, and no mitigation is required.

It is also noted, the Project would be constructed with fire safety features in compliance with applicable provisions of the adopted Los Angeles County Fire Code, ordinances, and standard conditions regarding fire prevention and suppression measures related to water improvement plans, fire hydrants, fire access, and water availability. Project development would also be subject to compliance with LACFD requirements for emergency access, fire-flow, fire protection standards, fire lanes, and other site design/building standards. Prior to Project approval, the Project building plans would undergo City and LACFD review to ensure the Project incorporates all applicable fire safety features. Prior to issuance of certificates of occupancy for the new buildings, the LACFD would inspect all new structures to ensure that all fire safety features have been implemented and installed correctly. Additionally, the Project would be subject to payment of development fees at the time of Building Permit or Certificate of Occupancy issuance, pursuant to GMC Chapter 15.48 to offset any increased costs for fire protection services. Compliance with this established regulatory framework would enhance fire and life safety, structural safety, and emergency access.



Mitigation Measures

No mitigation is required.

Impact 4.11-2:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Level of Significance: Less Than Significant Impact

The Project would be served by the GPD. The GPD station nearest the Project site is at 1718 West 162nd Street, approximately 0.5-mile to the northwest.

The Project proposes a multi-family residential development comprised of a 328-unit apartment building and 75 townhome style units to replace the existing approximately 115,424 SF of industrial buildings onsite. As concluded in **Section 4.10: Population and Housing**, the Project's forecast population growth is approximately 1,088 persons. The Project's forecast population growth would incrementally increase the demand for police protection services to the Project site. However, because the Project site is currently served by police protection services and is located in a suburban setting where police protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered police protection facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of police protection facilities. A less than significant impact would occur in this regard, and no mitigation is required.

Additionally, through the City's Site Plan Review process, the GPD would review the Project concerning emergency access and site/facility security requirements and recommendations. GPD would review Project plans to ensure compliance with applicable City regulations to ensure adequate site signage, lighting and other crime safety preventative measures are implemented. GPD review would act to ensure that development would conform to GPD emergency access and thereby reducing demands on law enforcement services. Additionally, the Project applicant would be subject to compliance with GMC Chapter 15.48, which requires payment of development impact fees to help offset any increased costs for law enforcement services. Project compliance with the established regulatory framework would enhance the Project's police protection.

Mitigation Measures

No mitigation is required.



Impact 4.11-3:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Level of Significance: Less Than Significant Impact

The Project proposes 403 dwelling units including 328 apartment units and 75 townhomes. **Table 4.11-3: Project Forecast Student Generation**, provides the student generation rates by grade level⁵ and the Project’s forecast student population growth. As shown in **Table 4.11-3**, the Project is forecast to generate a student population growth of approximately 151 new students within the LAUSD.

Table 4.11-3: Project Forecast Student Generation

Grade	Students per Dwelling/Household	Estimated Project Student Generation
Transitional Kindergarten – 6	0.195	79
7 – 8	0.054	22
9 – 12	0.107	44
Special Day Class	0.015	6
Total		151

Source: Los Angeles Unified School District. (2022). *2020 Developer Fee Justification Study*, Table 3: LA Unified Student Generation Factors.

The Project’s forecast student population growth would incrementally increase the demand for school facilities and services. **Table 4.11-4: Project Forecast Student Generation by School** presents the school capacity with the Project included and indicates sufficient capacity exists at the existing elementary and middle school facilities to accommodate the Project’s forecast student population, but insufficient capacity exists at the high school. However, the Project would be subject to payment of school impact fees in accordance with SB 50. Pursuant to Government Code §65995(3)(h), “payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property...” Additionally, the Project does not propose and would not require new or physically altered school facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of school facilities. A less than significant impact would occur in this regard, and no mitigation is required.

⁵ Los Angeles Unified School District. (2022). *2022 Developer Fee Justification Study*, Table 3: LA Unified Student Generation Factors.



Table 4.11-4: Project Forecast Student Generation by School

Schools Serving Project	Available Capacity ¹	Estimated Project Student Generation	Capacity with Project Included	Sufficient Capacity Exists?
Denker Avenue Elementary School (K-5)	126	79	47	Yes
Robert E. Peary Middle School (6-8)	159	22	137	Yes
Gardena Senior High School (9-12)	6	44	-38	No
Special Day Classes ¹	-	6 ¹	-	Yes
Notes: ¹ See Table 4.11-2 . There is leftover capacity at the three schools serving the Project site that could accommodate the six students in Special Day Classes				
Source: Los Angeles Unified School District. (2022). 2020 Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors.				

Mitigation Measures

No mitigation is required.

Impact 4.11-4: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library facilities?

Level of Significance: Less Than Significant Impact

The Project’s forecast population growth would incrementally increase the demand for library services, and specifically at the Gardena Mayme Dear Library, which is the library facility nearest the Project site. However, the County Library system has developed a Strategic Plan that identifies goals and objectives including financial management and fundraising strategies to maintain and enhance library facilities to meet future demands. Strategic initiatives associated with the Strategic Plan include Tell the Library Story; Affirm the Library as a Center for Learning; Expand and Support the Digital Library; Transform the Role of the Library as Place; Support and Cultivate the Community’s Creativity; Develop the Library as a Center for Community Engagement; and Develop Staff Prepared for the Future. It is also noted, there are four additional libraries within an approximately 2.0-mile radius of the Project site. Additionally, the County library system has expanded access to online e-books, audiobooks, movies, music, and newspapers. As such, the Project does not propose and would not require new or physically altered library facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of library facilities. A less than significant impact would occur and no mitigation is required.



Mitigation Measures

No mitigation is required.

4.11.5 CUMULATIVE IMPACTS

For purposes of the public services impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

As concluded above, all Project impacts concerning public services are considered less than significant, as the Project does not propose and would not require new or physically altered government facilities to maintain service objectives. The proposed Project, combined with cumulative development projects would result in incremental increases in public service demands as the number of people, buildings, businesses, roads, and utilities would increase.

Fire Protection

The geographic context for the cumulative analysis of fire protection services is the LACFD service area. The LACFD operates on a regional aid approach where emergency response units are dispatched as needed based on unit availability, rather than municipal or determined service boundaries. This regional response concept ensures that service levels are maintained throughout the entire LACFD service area. Further, as cumulative development would occur as redevelopment in a suburban area where government services and facilities are already provided, cumulative development would not result in adverse physical impacts associated with the provision of new/physically altered fire protection facilities, as new facilities would not be needed. Consequently, the Project combined with other cumulative development would result in less than significant cumulative environmental impacts concerning fire protection. Therefore, the Project would not cause a cumulatively considerable impact concerning fire protection services.

Police Protection

The geographic context for the cumulative analysis of police protection services is the Gardena Police Department service area. Through the City's Site Plan Review process, the Gardena Planning Department and Building Division would review the cumulative development projects on a project-by-project basis concerning access and other safety measures. Further, as cumulative development would occur as redevelopment in a suburban area where government services and facilities are already provided, cumulative development would not result in adverse physical impacts associated with the provision of new/physically altered police protection facilities, as new facilities would not be needed. Consequently, the Project combined with other cumulative development would result in less than significant cumulative environmental impacts



concerning police protection. Therefore, the Project would not cause a cumulatively considerable impact concerning police protection services.

Schools

The geographic context for the cumulative analysis of schools is the LAUSD jurisdiction. Construction of the Project, along with cumulative development of projects within LAUSD jurisdiction, would incrementally increase student population and thus demand for LAUSD facilities. The potential growth associated with cumulative development within the LAUSD would not require new or physically altered school facilities, as excess capacity currently exists the LAUSD, and each project would be evaluated to verify capacity exists on a project-by-project basis. Development fees would be assessed against cumulative residential, commercial, and industrial development, which would mitigate impacts resulting from the increased demand for school-related facilities services. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning school facilities. Therefore, the Project would not cause a cumulatively considerable impact concerning schools.

Other Public Facilities

The geographic context for the cumulative analysis of libraries is the County Library system. Development of the proposed Project, combined with other cumulative development, would create additional demand on the LACL system. Through the development review process, cumulative development would be evaluated on a project-by-project basis to determine their Library demands and the conditions for their establishment and operation. Further, as cumulative development would occur as redevelopment in a suburban area where government services and facilities are already provided, cumulative development would not result in adverse physical impacts associated with the provision of new/physically altered library facilities, as new facilities would not be needed. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning libraries. Therefore, the Project would not cause a cumulatively considerable impact concerning libraries.

4.11.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning public services have been identified.

4.11.7 REFERENCES

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4.12 RECREATION





4.12 RECREATION

This section analyzes the Project’s potential to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental park facilities, need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts. Additionally, this section analyzes the Project’s potential to 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 or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project’s potentially significant environmental impacts.

4.12.1 EXISTING SETTING

Similar to many cities in the County of Los Angeles (“County”), Gardena is a developed community with limited opportunities to expand its parks and recreation resources. **Table 4.12-1: Parks and Recreational Facilities in Gardena**, lists and describes the City’s parks and recreational facilities and indicates Gardena has six public parks, one community center, one municipal pool, one parkette, and two gymnasiums.

Table 4.12-1: Parks and Recreational Facilities in Gardena

Facility	Address	Size (Acres)	Distance to Project Site
Bell Park	14708 South Halldale Avenue	1.9	1.6 miles N
Freeman Park	2100 West 154 th Place	3.0	2 miles N/W
Mas Fukai Park	15800 South Brighton Avenue	4.9	0.8 mile N
Nakaoka Community Center	1670 West 162 nd Street	-	0.9 mile N/W
Rush Gymnasium			
Rowley Park and Gymnasium	13220 South Van Ness Avenue	18.7	3.8 miles N/W
Arthur Johnson Park	1200 West 170 th Street	6.8	0.4 mile S/E
Thornburg Park	2320 West 149 th Street	2.5	2.5 miles N/W

Source: City of Gardena. (No Date). *Gardena Facilities*. Retrieved from: <https://cityofgardena.org/gardena-facilities-2/>, accessed May, 2023.

The City park nearest the Project site is Arthur Lee Johnson Memorial Park, located 0.4-mile to the southeast, at 1200 West 170th Street. The Arthur Lee Johnson Memorial Park offers several amenities such as a 7,000 square foot (SF) skate park and various sports fields.¹ The Gardena Recreation and Human Services Department also hosts various recreational and after-school

¹ Los Angeles County Regional Park and Open Space District. (2016). *Arthur Johnson Park*. Retrieved from: <http://egis2.lacounty.gov/rposd/Details.aspx?id=36>, accessed May 2023.



programs in City parks and community buildings. In addition to public parks, there is a natural willows wetland in the City. The Gardena Willows Wetland Preserve is an 8.0-acre protected natural habitat in the City's southeast portion.²

There are several regional recreation and park facilities near the City that are available to Gardena residents including Chester L. Washington Golf Course to the north, Helen Keller Park to the northeast, Rosecrans Recreation Center to the east, and Alondra Park and Golf Course to the northwest. These regional facilities offer a wide range of recreational amenities including basketball courts, baseball and soccer fields, volleyball courts, a golf course, lake fishing, playgrounds, and picnic and barbeque areas.

4.12.2 REGULATORY SETTING

Federal

There are no federal regulations concerning recreational facilities that are applicable to the Project.

State

Quimby Act

The Quimby Act (California Government Code §66477) states that “the legislative body of a City or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map.” Quimby Act fees may be used for developing new or rehabilitating existing park or recreational facilities. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. Fees are only imposed on subdivisions.

State Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the state Public Park Preservation Act. Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

² City of Gardena. (2006). *City of Gardena General Plan 2006 Draft EIR*, Page 101. Retrieved from: <https://cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf>, accessed May 2023.



Landscaping and Lighting Act

The Landscaping and Lighting Act (California Streets and Highways Code §22500 et seq.) enables cities, counties, and special districts to acquire land for parks, recreation, and open space. A local government may also use the assessments to pay for improvements and maintenance to these areas. In addition to local government agencies (i.e., counties and cities), park and recreation facilities may be provided by other public agencies, such as community service districts, park and recreation districts, etc. If so empowered, such an agency may acquire, develop, and operate recreational facilities for the public.

State of California Open Space Standards

State planning law provides a structure for the preservation of open space by requiring every city and county in the state to prepare, adopt, and submit to the Secretary of the Resources Agency a “local open-space plan for the comprehensive and long-range preservation and conservation of open-space land within its jurisdiction” (Government Code §65560). The following open space categories are identified for preservation:

Open space for public health and safety, including, but not limited to, areas that require special management or regulation due to hazardous or special conditions.

Open space for the preservation of natural resources, including, but not limited to, natural vegetation, fish and wildlife, and water resources.

Open space for resource management and production, including, but not limited to, agricultural and mineral resources, forests, rangeland, and areas required for the recharge of groundwater basins.

Open space for outdoor recreation, including, but not limited to, parks, and recreational facilities, areas that serve as links between major recreation and open space reservations (such as trails, easements, and scenic roadways), and areas of outstanding scenic and cultural value.

Open space for the protection of Native American sites, including, but not limited to, places, features, and objects of historical, cultural, or sacred significance such as Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property (further defined in California Public Resources Code §§5097.9 and 5097.993).

Local

Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) Community Resources Element provides goals and policies concerning recreational facilities in the Open Space Plan.



- **OS Goal 1: Maintain and upgrade the existing parks and recreation facilities to meet the needs of all residents.**
 - **Policy OS 1.3:** Encourage adequate funding and capital improvement program to promote the ongoing maintenance and rehabilitation of City facilities.
- **OS Goal 2: Increase the supply and quality of parkland, open space, and recreational programs.**

Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 15.48 - Construction and Development Fees. This section outlines the development impact license fees for multi-unit residential developments. These fees are imposed because “development and construction of new residential living units within the city creates an immediate and present danger to the existing quality of life and the ecology of the city and threatens to burden and overtax the existing public purposes of the city, such as the provisions of public services, utilities, water and drainage and the treatment and disposal of sanitary sewerage which affects the health, welfare, and safety of the community.” All proceeds from the fees collected under this chapter shall be applied to the costs incurred by the city associated with the burden increased by the multi-unit residential facilities, open space, drainage and other public facilities and services related thereto. GMC §15.48.040 imposes a fee rate of \$1,000 per dwelling unit, except for affordable units.

GMC Chapter 17.20 - Park and Recreation Dedication and Fees. This chapter specifies that the City requires either the dedication of land, the payment of fees, or a combination of both for park or recreational purposes as a condition of the approval of a tentative or parcel map for residential subdivisions. Gardena has set a fee that may be paid in lieu of land dedication in the amount of \$10,000 per unit (Resolution No. 6433).

4.12.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to recreation. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant environmental impact if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Parks (see Impact 4.12-1),
- 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 (see Impact 4.12-2), or



- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (see Impact 4.12-2).

4.12.4 IMPACTS AND MITIGATION MEASURES

Impact 4.12-1:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental park facilities, need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Level of Significance: Less Than Significant Impact

The Project does not propose to provide or physically alter a park facility. However, the Project could incrementally generate a demand for new or physically altered park facilities.

As mentioned above, under GMC Chapter 17.20, the developer is required to pay \$10,000 per unit on a subdivision map. Under this requirement, the Project Applicant would pay \$750,000 for recreational purposes. Additionally, under GMC Chapter 15.48, the Project Applicant would pay an additional \$383,000, which may also be used for recreational purposes.

Any future development of new or rehabilitation of existing parkland or open space would be subject to review under CEQA to determine the potential adverse physical impacts associated with such improvements. Therefore, the Project would result in a less than significant impact concerning the need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts.

Mitigation Measures

No mitigation is required.

Impact 4.12-2:

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?

Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Level of Significance: Less Than Significant With Mitigation Incorporated



The Project's forecast population growth of approximately 1,088 persons could incrementally increase the use of existing neighborhood or regional parks or other recreational facilities; see **Table 4.10-7: Existing Plus Project Growth Forecast**. However, this incremental increase would not be such that substantial physical deterioration of an existing recreational facility would occur or be accelerated. To offset the use of existing neighborhood and regional parks, the Project proposes interior, exterior, and private open space uses. The Normandie Crossing Specific Plan (Section VI. Landscape and Open Space Plan) specifies that the Project must provide a minimum of 16,400 SF (50 SF per unit) of private open space and 22,698 SF of outdoor common open space for the proposed apartments and 3,750 SF (50 SF per unit) of private space and 7,645 SF of indoor and outdoor common open space for the proposed townhomes. The Project may provide additional private open space (such as balconies for certain dwelling units) for residents and their guests use and enjoyment.

The Project's common open space and amenities consist of a series of courtyards and open areas distributed across the Project site and within the apartment building for use by residents and their guests. Overall, the Project proposes approximately 50,493 SF of open spaces, including approximately 20,150 SF of private open space and approximately 30,343 SF of common open space.

The Specific Plan separates the proposed open space and amenities by Subarea A (Apartment Building Area) and Subarea B (Townhome Area). Each Subarea A unit would be provided a minimum of 50 SF of private open space. The amenities proposed in Subarea A's public open space are as follows: roof deck with BBQs and seating areas; swimming pool with BBQ and seating areas; a dog park; fitness room; club houses; and a courtyard with seating area, and game tables. Each Subarea B unit would be provided 50 SF of private open space (i.e., balconies and roof decks). The amenities proposed in Subarea B's public open spaces are as follow: swimming pool with BBQ and seating areas; dog park; club house; and paseos with seating areas.

Therefore, considering the Project's proposed open spaces and recreational amenities, the Project would not 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. A less than significant impact would occur in this regard, and no mitigation is required.

The open spaces and recreational facilities discussed above are discussed as part of the overall environmental analyses in Sections 4.1 through 4.16 of this EIR. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed open spaces and recreational facilities' nature and scale, their construction-related noise impacts are not considered significant with mitigation incorporated. Therefore, with mitigation incorporated, the Project would result in less than significant



environmental effects associated with construction of the proposed open spaces and recreational facilities.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

4.12.5 CUMULATIVE IMPACTS

For purposes of the recreation impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic context for the cumulative analysis of parks and recreation is the City of Gardena.

As concluded above, the Project would result in a less than significant impact concerning the need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts. Additionally, considering the Project's proposed open spaces and recreational amenities, the Project would not 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 and a less than significant impact would occur in this regard. However, the adverse physical effects on the environment associated with construction of the Project's proposed open spaces and recreational facilities would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated.

As indicated in **Table 4.10-10: Existing Plus Cumulative Growth Forecast**, the Project's forecast population growth when combined with the related projects is 4,955 persons. Project development, when combined with other cumulative development, would generate additional demand on the existing City parks and recreational facilities due to population growth. Through the development review process, cumulative developments would be evaluated on a project-by-project basis to determine their parkland demands and the conditions for their establishment and operation. Payment of GMC fees and/or land dedications by cumulative developments would mitigate the impacts from cumulative demands for parkland and recreational facilities to less than significant levels. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning parks and recreational facilities. Therefore, the Project would not cause a cumulatively considerable impact concerning parks and recreational facilities.

4.12.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning park and recreational facilities have been identified.



4.12.7 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006, Open Space Plan, updated 2022*. Retrieved from: <https://cityofgardena.org/wp-content/uploads/2016/04/generalplan6.pdf>, accessed May 2023.

City of Gardena. (2006). *City of Gardena General Plan 2006 Draft EIR*, Page 101. Retrieved from: <https://cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf>, accessed May 2023.

City of Gardena. (No Date). *Gardena Facilities*. Retrieved from: <https://cityofgardena.org/gardena-facilities-2/>, accessed May, 2023.

Los Angeles County Regional Park and Open Space District. (2016). *Arthur Johnson Park*. Retrieved from: <http://egis2.lacounty.gov/rposd/Details.aspx?id=36>, accessed May 2023.

An architectural rendering of a modern multi-story apartment building. The building features a central courtyard with a swimming pool, lounge chairs, and a glass-enclosed walkway. The architecture is contemporary with large windows and balconies. The scene is set in a city environment with other buildings visible in the background.

4.13 TRANSPORTATION



4.13 TRANSPORTATION

This purpose of this section is to describe the existing regulatory and environmental conditions related to transportation, and analyze the Project’s potential to conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; conflict or be inconsistent with State CEQA Guidelines §15064.3(b); substantially increase hazards due to a geometric design feature or incompatible uses; or result in inadequate emergency access. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project’s potentially significant environmental impacts.

Information in this section is based primarily on transportation data provided in the following resources:

- *CEQA Transportation Impact Assessment, 16911 Normandie Project* (“CEQA Transportation Impact Assessment”) (Fehr & Peers, January 2023); see **Appendix 4.13-1: CEQA Transportation Impact Assessment**.
- *Normandie Crossing Specific Plan Local Transportation Assessment* (“Local Transportation Assessment”) (Fehr & Peers, August 2023); see **Appendix 4.13-2: Local Transportation Assessment**.

It is noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena (“City”) of the Project’s CEQA Transportation Impact Assessment and Local Transportation Assessment; see **Appendix 4.13-1** and **Appendix 4.13-2**. The third-party review concluded the analyses meet the applicable provisions of the California Environmental Quality Act (CEQA) and State CEQA Guidelines.

4.13.1 EXISTING SETTING

Project Area Transportation System

Transit Facilities

The Project site is located less than a mile walking distance from five bus routes:

- **Line 1X (GTrans):** Connects the LA Metro C Line Redondo Beach Station and Gardena to Downtown Los Angeles. Route 1X runs express service between Redondo Beach Boulevard and Harbor Freeway C (Green)/J (Silver) Line Station where connections can be made to Downtown Los Angeles. There are two bus stops within 0.25-mile of the Project site: both are located on 166th Street and Brighton Avenue (eastbound and westbound).
- **Line 2 (GTrans):** Circles Western, Imperial Highway, Vermont, Normandie and PCH up to just past the 105 freeway and south to Harbor UCLA Medical Center. The northbound stop is approximately 0.8 mile from the Project site at Vermont Avenue and Gardena



Boulevard and the southbound stop is approximately 0.6 mile at Vermont Avenue and 170th Street.

- **Line 1 (Torrance Transit):** This line goes from Del Amo Fashion Center at Carson and Hawthorne Boulevards to Figueroa Street located at the 105 Freeway. Both the northbound and southbound stops are at Vermont Avenue and Gardena Boulevard approximately 0.8 mile from the Project site.
- **Line 13 (Torrance Transit):** This line goes from Veteran’s Park in Redondo Beach, north to Artesia Boulevard through Hermosa Beach to Vermont Avenue, past California State University Dominguez Hills, and ending in the City of Commerce across from the Crystal Casino. Both the eastbound and westbound stops are approximately 0.4 mile from the Project site at Artesia Boulevard and Normandie Avenue.
- **Line 344 (Metro):** This line goes from Palos Verdes Drive and Hawthorne Boulevard to Artesia Boulevard, and then along Vermont Avenue to the Harbor Gateway Transit Center. The bus stops are both approximately 0.4 mile from the Project site, also at Artesia Boulevard and Normandie Ave.
- **Harbor Gateway Transit Center:** The Transit Center, located at 731 West 182nd Street, is a large bus station that serves as a transport hub for the South Bay region of Los Angeles County, including the City of Gardena. The J line can be accessed from this station, which provides transit to both downtown Los Angeles and San Pedro. Numerous other lines can also be accessed from this station. The Transit Center also includes a 980-space park and ride. The Transit Center is approximately 0.9 mile from the Project site.

Roadway Facilities

Regional access to the Project site is provided via four major freeways: the Century freeway (I-105) to the north; the northern segment of the San Diego freeway (I-405) to the south and east; and the Harbor freeway (I-110) and the Gardena Freeway SR-91 (becomes West Artesia Boulevard) to the east. From I-105, access to the Project site is provided via Crenshaw Boulevard and Vermont Avenue, from I-405, access is provided via Normandie Avenue, from I-110, access is provided via Artesia Boulevard at the City’s northern portion, which intersects with Normandie Avenue, and from SR-91, access is provided via Artesia Boulevard in the City’s southern portion, which intersects with Normandie Avenue.

The key roadways providing local access to the Project site are described below. Overall, the roadway network surrounding the Project site is provided by a network of major, arterial, and collector streets. The following describes the key roadway facilities that serve the Project site and their classifications, as specified in Figure CI-1: Roadway Network in the Gardena General Plan Circulation element.

Normandie Avenue. Normandie Avenue is a north/south Major Collector with two lanes in each direction that runs through the City. Normandie Avenue is designated as a truck route within the City. Left-turn lanes are provided at major intersections. The posted speed limit is 35 miles per



hour (mph). On-street parking is prohibited on both sides of the street. The Union Pacific Torrance Branch railroad right of way (ROW) crosses Normandie Avenue and runs along the Project site's eastern frontage. Normandie Avenue is designated as a truck route within the City.

Artesia Boulevard. Artesia Boulevard is an east/west Arterial with three to four lanes in each direction that is under local jurisdiction. Artesia Boulevard transitions into SR-91 east of Vermont Avenue under Caltrans jurisdiction. Artesia Boulevard contains a raised median, and the posted speed limit is 45 mph. There are left-turn pockets at all intersections. On-street parking is prohibited on both sides of Artesia Boulevard.

Gardena Boulevard. Gardena Boulevard is an east-west Collector that runs through Gardena with a short jog at Normandie Avenue. Gardena Boulevard has one lane in each direction and a posted speed of 30 mph east of Normandie Avenue and 25 mph west of Normandie Avenue. On-street parking is permitted on both sides of the street, with angled parking provided east of Normandie Avenue.

West 166th Street. 166th Street is an east-west Collector that runs from Gramercy Place in Torrance to Berendo Avenue in Gardena. 166th Street is classified as a Local Street except for the segment between Western Avenue and Normandie Avenue, where it is classified as a Collector. On-street parking is permitted on both sides of the street, and the posted speed limit is 25 mph east of Normandie Avenue and 30 mph west of Normandie Avenue. A raised median is provided east of Normandie Avenue that contains the Union Pacific Railroad Torrance Branch railroad ROW and double tracks.

West 169th Street. 169th Street is an east/west Local Street that runs from Denker Avenue to Normandie Avenue with one lane in each direction. On-street parking is generally provided on both sides of 169th Street.

West 170th Street. 170th Street is an east/west Local Street that runs from Denker Avenue to Normandie Avenue where it dead ends and then picks up again on the other side of Normandie Avenue to Vermont Avenue with one lane in each direction. 170th Street west of Normandie Avenue does not connect to Normandie Avenue or the segment east of it. On-street parking is generally provided on both sides of 170th Street and the posted speed limit is 25 mph.

Brighton Way. Brighton Way is a north/south Local Street that runs from 169th Street to 170th street with a shared lane for each direction. Although classified as a Local Street, Brighton Way is currently a public alleyway. On-street parking is not provided.

Pedestrian Facilities

Existing sidewalks are provided along the Project frontage and within a continuous and complete pedestrian network in the surrounding area. Sidewalks along the south side of 169th Street are discontinuous for a short segment from just west of the Project site to the alley west of Brighton



Avenue. Sidewalks are also not present on Brighton Way. Marked crosswalks, curb ramps, and pedestrian signals are provided at the nearest signalized intersections along Normandie Avenue at 166th Street and 170th Street, which provide direct access to nearby bus transit stops (see Transit discussion above) and surrounding land uses.

Bicycle Facilities

There are no bicycle facilities (separated or protected) currently on Normandie Avenue, West 169th Street, or West 170th Street along the Project site frontages. However, there are existing and proposed South Bay Bicycle Master Plan (SBBMP) bike routes near the Project site; see the *South Bay Bicycle Master Plan Section* below.

Railroad Facilities

The Project site includes a railroad spur from the adjacent Union Pacific Railroad (UPRR) northern track; see **Exhibit 2-2: Local Vicinity Map**. This spur is associated with the former onsite industrial operations but is no longer in use. The parcel immediately adjacent and east of the Project site is occupied by UPRR tracks. Additionally, Normandie Avenue contains public and private railroad tracks along the road's western boundary. The railroad tracks cross onto the roadway's eastern side along the Project's frontage.

4.13.2 REGULATORY SETTING

Federal

Americans with Disabilities Act

The ADA of 1990 prohibits discrimination toward people with disabilities and guarantees that they have equal opportunities as the rest of society to become employed, purchase goods and services, and participate in government programs and services. The ADA includes requirements pertaining to transportation infrastructure. The Department of Justice's regulations for Titles II and III of the ADA, known as the 2010 ADA Standards for Accessible Designs, set minimum requirements for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. These standards apply to accessible walking routes, curb ramps, and other facilities.

State

Senate Bill 375 - Sustainable Communities Strategies: Land Use Planning

Senate Bill (SB) 375 provides a planning process to coordinate land use planning and regional transportation plans (RTP) and funding priorities in order to help California meet the greenhouse gas (GHG) reduction goals established in Assembly Bill (AB) 32. SB 375 requires that RTPs



developed by metropolitan planning organizations (MPO) (e.g., Southern California Association of Governments [SCAG]) incorporate a “sustainable communities’ strategy” (SCS) that would achieve GHG emission reduction targets set by the California Air Resources Board (CARB). SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as Transit-Oriented Developments (TODs).

Senate Bill 743

The Steinberg Act (SB 743) (also known as the Environmental Act) was enacted in 2013 to shift the focus of transportation analysis from driver delay to reducing GHG emissions, creating multimodal networks, and promoting mixed land uses. SB 743 required the Governor’s Office of Planning and Research (OPR) to amend the State CEQA Guidelines to provide alternative level of service metrics for transportation impact evaluations. In December 2018, the updated State CEQA Guidelines were approved, shifting traffic analysis from delay and operations to vehicle miles traveled (VMT) when evaluating transportation impacts under CEQA.

Measurements of transportation impacts may include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. According to SB 743, projects should aim to reduce VMT and mitigate potential VMT impacts through the implementation of transportation demand management (TDM) strategies. Agencies were to have fully implemented the new CEQA mandates for transportation by July 1, 2020.

Regional

Regional Transportation Plan/Sustainable Communities Strategy

The SCAG Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted on September 3, 2020. The RTP/SCS aims to create a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal Program EIR (SCH #2019011061) addresses the cumulative impact of future development and associated infrastructure improvements for the SCAG region, which includes Los Angeles County and the City of Gardena. The RTP/SCS is available on SCAG’s website at: <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>.

South Bay Bicycle Master Plan

The intent of the South Bay Bicycle Master Plan (SBBMP) is to guide the development and maintenance of a comprehensive bicycle network and set of programs and policies throughout the cities of El Segundo, Gardena, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, and Torrance for the next 20 years. The Master Plan has a unique focus on cross-city consistency and connectivity that is often lacking in singular city bike plans. Upon plan adoption, each



participating city would be eligible for grant funding sources. Master Plan Figure 4-3: *Proposed Bicycle Facilities in Gardena*, depicts Gardena’s existing and proposed bike lanes and identifies the following facilities in the Project site’s vicinity:

Existing

- Class III bike route¹ exists along Normandie Avenue between West 170th Street and West 182nd Street. This bike route is near the Project site’s southeastern corner.
- Class III bike route exists along West 166th Street between Brighton Avenue and Berendo Avenue, approximately 0.12-mile north of Project site.
- Class III bike route exists along Gardena Boulevard between Andrews Place and Brighton Avenue, approximately 0.25-mile north of the Project site.
- Class III bike route exists along West 170th Street between Normandie Avenue and Berendo Avenue, approximately 0.03 mile east of the Project site.

Proposed

- Bike Friendly Street² segment is proposed along the Project site’s southern boundary along West 170th Street, between Denker Avenue and Vermont Avenue.

Local

City of Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) Community Development Element provides a Circulation Plan with the following goals and policies to enhance the development and maintenance of a transportation system:

- **CI Goal 1:** Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.
 - **Policy CI 1.1:** Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.

¹ Class III Bike Routes share the right-of-way between vehicles and bicyclists with signage and optional shared lane markings to indicate that the road is a shared use facility. (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition. (2011). *South Bay Bicycle Master Plan*. Retrieved from: https://bchd.org/docs/healthy-communities/South_Bay_BMP_Draft_Final_Plan.pdf, accessed June, 2023.)

² A Bike Friendly Streets are defined as local roads that have been enhanced with treatments that prioritize bicycle travel. These treatments include wayfinding signage, pavement markings and traffic calming. (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition. (2011). *South Bay Bicycle Master Plan*. Retrieved from: https://bchd.org/docs/healthy-communities/South_Bay_BMP_Draft_Final_Plan.pdf, accessed June, 2023.)



- **CI Goal 3:** Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.
 - **Policy CI 3.3:** Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.
 - **Policy CI 3.4:** Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system.

City of Gardena Public Safety Plan

The Gardena Public Safety Plan (GPSP) outlines emergency response actions in the event of a large-scale disaster. The following policies are applicable to the Project:

- **PS Goal 1:** A community that is highly prepared and equipped to handle emergency situations in order to minimize loss of life, injury, property damage, and disruption of vital services.
 - **PS 1.7: Development Review.** Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.
- **PS Goal 2:** A City that is adequately prepared for fire emergencies.
 - **PS 2.2: Building and Fire Codes.** Require that all buildings and facilities within Gardena comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards.
 - **PS 2.7: New Development.** Require adequate fire protection services, fire protection plans, and emergency vehicle access for new development. Locate, design, and construct new development to minimize the risk of structural loss from fires.
- **PS Goal 3:** Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.
 - **PS 3.1: California Building Code.** Require compliance with seismic safety standards in the California Building Code, as adopted and amended.



City of Gardena Municipal Code

Gardena Municipal Code (GMC) §17.08.170 - Improvements. This section requires any subdivider to improve, or agree to improve, all streets, highways, alleys, ways, or easements within or adjacent to the proposed subdivision. These improvements must be installed at lines and grades and in accordance with specifications approved by the City engineer.

4.13.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning transportation. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (see Impact 4.13-1);
- Conflict or be inconsistent with State CEQA Guidelines §15064.3, subdivision (b) (see Impact 4.13-2);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (see Impact 4.13-3);
- Result in inadequate emergency access (see Impact 4.13-4).

4.13.4 PROJECT DESIGN FEATURES

The following Project design feature (PDF) was incorporated into the analysis:

- **PDF TR-1. Construction Traffic Management Plan:** Prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to City for review and approval. The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan will include, but not be limited to, the following measures:
 - Identified routes for vehicular traffic, bicyclists, and pedestrians around traffic lane, parking lane and/or sidewalk closures as they are required;
 - Provisions to ensure that access remains unobstructed for land uses near the Project site during construction;
 - Provisions to accommodate parking for construction workers either on-site or at off-site, off-street locations. Parking would be prohibited on streets in the vicinity of the Project site; and



- Prior to the start of construction, the Applicant would coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

4.13.5 IMPACTS AND MITIGATION MEASURES

Impact 4.13-1:

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

Level of Significance: Less Than Significant Impact

Please refer to **Table 4.8-4: Gardena General Plan 2006 Consistency**, which evaluates the Project's consistency with the GGP. The analysis finds that the Project is consistent with the applicable Community Development Element, Circulation Plan policies. Transit, roadway, bicycle, and pedestrian facilities are discussed further below:

Transit. As discussed above, public transit service to the Project area is provided by GTrans. Nearby bus routes provide service at the following locations:

- Line 1X (GTrans): Eastbound and westbound stops on 166th Street and Brighton Avenue.
- Line 2 (GTrans): Northbound stop on Vermont and Gardena Boulevard and the southbound stop on Vermont Avenue and 170th Street.
- Line 1 (Torrance Transit): Northbound and southbound stops on Vermont Avenue and Gardena Boulevard.
- Line 13 (Torrance Transit): Eastbound and westbound stops on Artesia Boulevard and Normandie Avenue.
- Line 344 (Metro): Northbound and southbound stops on Artesia Boulevard and Normandie Avenue.

Additionally, the western portion of the Project site is within 0.5-mile of a High-Quality Transit Corridor, which is a transit corridor with fixed route bus service frequency of no longer than 15 minutes during peak commute hours.³

The Project proposes a residential development with a forecasted population growth of approximately 1,088 persons, which has the potential to increase public transit ridership. Further, per the NCSP, new residents who sign a 12-month lease would be offered one free monthly Metro pass, providing more access to public transit opportunities. However, as concluded in **Table 4.8-4**, the Project is consistent with the GGP Circulation Plan Policies concerning transit facilities. Therefore, the Project would not conflict with a program plan,

³ The morning and afternoon peak commute hours are defined at 6:00 to 9:00 AM and 3:00 to 6:00 PM, respectively.



ordinance, or policy concerning transit facilities, and a less than significant impact would occur in this regard.

Roadways. Vehicular access to the Project site would be provided by the following four driveways:

- Driveway 1 would serve the apartment building's parking garage from 169th Street west of Normandie Avenue,
- Driveway 2 would also serve the apartment building's parking garage from southbound Normandie Avenue,
- Driveway 3 would serve the townhomes from 170th Street, and
- Driveway 4 would also serve the townhomes from 169th Street.

Internal roadways would connect Driveways 3 and 4 to all townhomes but would not connect to the apartment building garage. Additionally, a continuous fire access lane (varying from 26 to 34 feet in width) is proposed through the townhome area to provide adequate emergency access. All roadway and driveway improvements would be constructed pursuant to Los Angeles County Fire Department requirements. There are no proposed offsite roadway improvements. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning roadway facilities, and a less than significant impact would occur in this regard.

Bicycle facilities. As described above, there are four existing Class III bike lanes (along Normandie Avenue, along West 166th Street, along Gardena Boulevard, and along West 170th Street). However, there are no separated or protected bicycle facilities that currently exist along the Project site frontages. Additionally, there is one proposed Bike Friendly Street segment along the Project site's southern boundary along West 170th Street. The Project proposes a residential development with a forecasted population growth of approximately 1,088 persons, which has the potential to increase the use of existing bicycle facilities.

The Project does not propose any changes to the existing bicycle facilities surrounding the Project site and it would not impede or alter the installation of the SBBMP's -planned bicycle facilities, including the Bike Friendly Street segment planned along West 170th Street. Appropriate striping and signage would be installed at driveway approaches to meet Manual on Uniform Traffic Control Devices (MUTCD)⁴ and City design standards and in accordance with roadway safety best practices. Additionally, the Project proposes 173 bicycle parking spaces, which supports GP Policy CI 3.4 to "maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the Metropolitan Transportation Authority's (MTA's) regional bicycle system" by providing bicycle amenities and parking on-site for residents, visitors, and

⁴ The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all public streets, highways, bikeways, and private roads open to public travel. The MUTCD is published by the Federal Highway Administration (FHWA) under 23 Code of Federal Regulations, Part 655, Subpart F.



employees. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning bicycle facilities, and a less than significant impact would occur in this regard.

Pedestrian Facilities. As discussed above, sidewalks are provided in the area surrounding the Project site, except the sidewalk on the south side of West 169th Street is not complete between the Project site and the alley to the west of Brighton Avenue, and on north side of West 170th Street and east side of Brighton Way. To provide a complete pedestrian path for residents, the Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169th Street (between Brighton Way and Normandie Avenue), on the north side of West 170th Street (between Brighton Way and Normandie Avenue), on the west side of Normandie Avenue (between West 169th Street and West 170th Street), and on the east side of Brighton Way (between West 169th Street and West 170th Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169th Street, just west of the Project site, between Brighton Way and the alley to the west of Brighton Avenue. With the incorporation of these proposed sidewalk improvements, the Project would create a continuous and complete pedestrian network in the area surrounding the Project site. The sidewalk improvements would be constructed pursuant to GMC §17.08.170: Improvements and designed to be consistent with the GGP Circulation Element requirements for a Local Street. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning pedestrian facilities, and a less than significant impact would occur.

As evidenced by the analyses presented above, and as concluded in **Table 4.8-4**, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project would result in a less than significant impact in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.13-2:

Would the Project conflict or be inconsistent with State CEQA Guidelines §15064.3, subdivision (b)?

Level of Significance: Less Than Significant Impact

The Project has been analyzed below to evaluate consistency with State CEQA Guidelines §15064.3(b) concerning VMT based on the Project’s **Transportation Impact Assessment**; see **Appendix 4.13-1**.



Baseline VMT

The VMT methodology employed in this analysis is consistent with the screening methodologies and impact criteria adopted by the City in their SB 743 Implementation Transportation Analysis Updates. Per the City’s adopted criteria, the baseline VMT for the City is calculated using the 2016 Regional Transportation Plan (RTP) Travel Demand Forecasting (TDF) model developed by SCAG. The methodology includes vehicle trips within the SCAG model to generate the following metric as applicable for the Project’s proposed residential uses:

- Home-based VMT per Capita: Home-based vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the residential population within the geographic area. This metric is used to estimate VMT for residential land uses.

VMT Impact Thresholds

The City adopted a 15 percent below the baseline regional average VMT (as defined by the SCAG six-county region) as the impact threshold for land use development projects in the City. If a project would generate VMT higher than the threshold, then it would be expected to have a VMT impact, and if the project would generate VMT lower than the threshold, then it would be expected to have a less than significant VMT impact. The regional baseline VMT and City’s VMT impact thresholds are summarized in **Table 4.13-1: Baseline Regional VMT and City of Gardena VMT Impact Thresholds**.

Table 4.13-1: Baseline Regional VMT and City of Gardena VMT Impact Thresholds

VMT Metrics – Regional Home-Based VMT per Capita	Baseline VMT	City VMT Impact Threshold
2020	14.35	12.20
2040	12.97	11.02
Notes: ¹ The VMT Impact Threshold is 15% below the respective Baseline VMT.		
Source: Appendix 4.13-1 , Table 1.		

VMT Screening

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. The City identified three screening criteria to assess if a VMT analysis would be required for a project. The three screening criteria are detailed below and applied to the Project to determine if it would have the potential to result in a VMT impact.

Screening Criteria 1: Project Type

Land use projects that generate less than 110 daily trips and local-serving retail projects, defined as commercial projects with local-serving retail uses less than 50,000, are presumed to have less



than significant VMT impact, absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size. Residential projects that are 100 percent affordable are also screened out.

Based on The Institute of Transportation Engineer's (ITE) Trip Generation Manual (11th Edition) provides trip rate for multi-family land use types (i.e., mid-rise and 4.54 trips per unit, and low-rise and 6.74 trips per unit), the Project's proposed 403 residential units are expected to generate approximately 1,715 average daily trips (ADT), which would be more than 110 ADT threshold. Also, the Project is not 100 percent affordable. Therefore, the Project is not screened out from VMT analysis based on project type screening criterion.

Screening Criteria 2: Low VMT Area Screening

Residential projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. Based on the City's VMT impact threshold, low VMT for residential projects is defined as an area that generates VMT on a per capita basis that is 15 percent or more below the Regional Home-Based VMT per Capita. In the City, a low VMT area for residential projects generates no more than 12.20 Home-Based VMT per Capita in 2020 and 11.02 VMT per Capita in 2040; see **Table 4.13-1**. The traffic analysis zones (TAZ) contained in the SCAG model can be used to identify the City's low VMT areas.

The Project is in a TAZ estimated to generate 11.01 VMT per capita, which is 23.3 percent below the 2020 SCAG regional baseline VMT of 14.35. When compared to the 2040 SCAG regional baseline VMT of 12.97, the Project's VMT per capita is 15 percent below the 2040 SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project can be presumed to have a less than significant VMT impact and can be screened out from further VMT analysis based on low VMT area screening.

In addition, OPR's Technical Advisory suggests that a project in a low VMT area is presumed to have a less than significant VMT impact if the project incorporates similar features as other development in the vicinity, such as similar density, similar mix of uses, and similar transit access. The TAZ contains primarily residential land uses in the areas surrounding the Project site, including the multi-family residential development to the north. Therefore, the Project has similar characteristics as development in the vicinity.

Screening Criteria 3: Transit Proximity Screening

Projects located in proximity to high quality transit may also be exempt from VMT analysis because they are presumed to have a less than significant impact absent substantial evidence to the contrary. OPR's Technical Advisory defines Transit Priority Areas (TPAs) as a 0.5-mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of no



longer than 15 minutes during peak commute hours. For this analysis, the morning and afternoon peak commute hours are defined as 6:00 to 9:00 AM and 3:00 to 6:00 PM, respectively.

Public Resources Code (PRC) §21155, which states in a portion not excerpted in the City's Guidance, "A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor." The Project has more than 25 percent of its area farther from Gardena's High-Quality Transit Areas. Therefore, the Project is not screened out from VMT analysis under this screening criterion.

Conclusions

Table 4.13-2: VMT Screening Options for Land Use Projects, summarizes the findings of the Project's analysis concerning the three screening criteria discussed above and notes the Project meets the City's low VMT screening criteria. Therefore, based on the City's transportation guidelines and impact thresholds, the Project can be screened out from a full VMT analysis and is presumed to result in a less than significant transportation impact concerning VMT under the low VMT screening criteria.

Table 4.13-2: VMT Screening Options for Land Use Projects

Screening Category	Screening Criteria	Project Screened Out?
Project Type Screening	Presumed less than significant impact for 100 percent affordable projects, local serving retail projects (defined as less than 50,000 per OPR's Technical Advisory) and projects that generate less than 110 daily trips.	No
Low VMT Area Screening	Presumed less than significant VMT impact for projects located in low VMT generating TAZs. These TAZs generate total daily VMT per capita or per employee that is 15 percent less than the baseline level for the region.	Yes
Transit Proximity Screening	Presumed less than significant VMT impact for projects located in high-quality transit areas.	No

Source: Kimley-Horn and Associates.

Mitigation Measures

No mitigation is required.



Impact 4.13-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Level of Significance: Less Than Significant Impact

As previously mentioned in Impact 4.13-1, vehicular access to the Project Site would be provided by the following four driveways:

- Driveway 1 would serve the apartment building's parking garage from 169th Street west of Normandie Avenue.
- Driveway 2 would also serve the apartment building's parking garage from southbound Normandie Avenue.
- Driveway 3 would serve the townhomes from 170th Street.
- Driveway 4 would also serve the townhomes from 169th Street.

Internal roadways would link Driveways 3 and 4 to all townhomes but would not connect to the apartment building garage. As depicted in **Exhibit 2-4: Conceptual Site Plan**, the Project's driveways are perpendicular to the public ROW and spaced from existing intersections pursuant to GMC §17.08.170 and City standards.

The Project proposes Driveway 2 on Normandie Avenue that is near the Union Pacific Torrance Branch railroad. Train travel on this branch is relatively light and slow due to track curvature, at-grade crossings, and in-street train operations. Driveway 2 is proposed to be right-in/right-out only on southbound Normandie Avenue and would intersect the roadway at a right-angle outside of the railroad tracks. Additionally, a 125-foot median along Normandie Avenue would be installed that would surround the railroad tracks to prevent left-turns to and from Driveway 2. If train traffic is blocking egress from Driveway 2, Driveway 1 is available for ingress and egress associated with the apartment building.

As previously noted, Normandie Avenue contains railroad tracks along the road's western boundary. The railroad tracks cross onto the roadway's eastern side along the Project's frontage. To assess the Project's potential to increase transportation hazards associated with the existing railroad facilities, the City and Applicant consulted with the California Public Utilities Commission (CPUC) and Union Pacific Railroad (UPRR). Through the consultation process, various railroad improvements were identified as being required along Normandie Avenue pursuant to current CPUC standards and UPRR guidelines. As such, the Project proposes railroad track improvements along Normandie Avenue, which are designed pursuant to current CPUC standards and UPRR guidelines, and include the following:

- Removing approximately 170 linear feet of the spur track, which enters the Project site and serves the southernmost industrial building (16911 Normandie Avenue);



- Removing approximately 830 linear feet of railroad spur track which enters the Project site and serves the central industrial building (16907 Normandie Avenue);
- Constructing a new median both north and south of the track alignment,
- Installing new warning devices and tactile warning strips on the Normandie Avenue east and west sidewalks,
- Refreshing railroad crossing pavement markings immediately north and south of the track alignment.

Therefore, the Project would not increase transportation hazards due to an incompatible use near a railroad, and impacts would be less than significant in this regard.

It is noted, the UPRR Parcel immediately adjacent and east of the Project site is currently occupied by UPRR tracks. The Project proposes to redesignate the property from Industrial to Public/Institutional, and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use; see **Section 4.9: Land Use**.

Finally, the Project does not introduce incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard. The Project proposes construction and operation of a 403-DU multi-family residential development adjacent to other residential uses. These land uses are typical of suburban areas, such as the City, and would not create a transportation hazard due to an incompatible use. Therefore, the Project would not increase transportation hazards due to an incompatible use and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Impact 4.13-4:

Would the Project result in inadequate emergency access?

Level of Significance: Less Than Significant Impact

Construction

Project construction may require traffic lane, parking lane, and/or sidewalk closures, including along Normandie Avenue, but would not result in the complete closure of any public or private street. The Project would implement PDF TR-1, which requires a Construction Traffic Management Plan, approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access.

With implementation of the Construction Traffic Management Plan, the temporary construction activities would not impede use of the streets for emergencies or access for emergency response



vehicles. Therefore, Project construction would not result in inadequate emergency access. A less than significant impact would occur, and no mitigation is required.

Operation

As described above, primary vehicular access to the Project site would be provided by four driveways; see Impact 4.13-1. Additionally, a fire access lane (varying from 26 to 34 feet in width) is proposed throughout the townhome portion of the Project site, which would provide emergency access. The LACFD requires fire lanes to be a minimum of 26 feet wide and include fire lane signage. Painted red curbs would delineate the limits of the fire lanes. Signage for the fire department with direction to units would be placed pursuant to LACFD requirements. The Project is also located approximately 1.0 mile from Los Angeles County Fire Department (LACFD) Station 158, which serves the City. While the Project is expected to increase the number of vehicles on local roadways, emergency responders have sirens and are able to bypass intersection queues, utilize two-way left-turn lanes, and use the opposite side of streets. The Project also does not propose any features that would inhibit emergency access to nearby areas.

Further, the Project site is located in an urbanized area where adequate circulation and access are provided to facilitate emergency response. The Project would be subject to compliance with GPSP⁵ policies, specifically PS 1.7, PS 2.2, PS 2.7 and PS 3.1.

Therefore, the Project would have a less than significant impact concerning emergency access during operation and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.13.6 CUMULATIVE IMPACTS

The context for assessing cumulative environmental impacts associated with transportation in the City is as follows: for transit facilities it is the GTrans, Torrance Transit, and Metro service areas; for roadway, bicycle, and pedestrian facilities and VMT, it is the City of Gardena.

Consistency with Applicable Plans, Ordinances, and Policies

As described above, the Project's Circulation Plan would be consistent with the GGP elements pertaining to the circulation system, concerning transit, roadways, bicycle, and pedestrian facilities, resulting in a less than significant impact. As with the proposed Project, each related project would be expected to demonstrate consistency with existing programs, plans, ordinances, and policies that address the City's circulation system (such as the General Plan

⁵ City of Gardena. (2022). Public Safety Plan. Retrieved from https://cityofgardena.org/wp-content/uploads/2022/04/Gardena_Public-Safety-Element_FINAL-FOR-ADOPTION.pdf.



Circulation and Mobility Sub-Element). Additionally, each related project would be expected to show consistency with SCAG's Connect SoCal. No significant cumulative impacts would occur for the proposed Project and the related projects concerning compliance with City circulation policies or standards adopted to protect the environment and support multimodal transportation options. Therefore, when combined with cumulative development, the Project's potential impacts concerning consistency with applicable plans, ordinances, and policies would not be cumulatively considerable.

Vehicle Miles Traveled

For baseline conditions, the Project is screened out from further VMT analysis based on its location in a low VMT area. For cumulative conditions, a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact, provided it complies with long-term State environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS. The Project supports long-term environmental goals as an in-fill residential project that provides housing near commercial and employment areas. The Project is also aligned with the SCAG RTP/SCS because the Project is partially within a HQTAs and provides housing development in a TAZ with downward trending VMT per capita, which is consistent with the RTP/SCS goals. Therefore, when combined with cumulative development, the Project's potential impacts concerning VMT and consistency with State CEQA Guidelines §15064.3(b), would not be cumulatively considerable.

Hazardous Geometric Design Features

The Project does not propose any geometric design features or incompatible uses that would substantially increase hazards. A potentially cumulative impact would occur if the Project would combine with a related project to create or substantially increase hazards due to geometric design features or incompatible uses. There are no related projects adjacent to where the Project's proposed railroad improvements are proposed. Additionally, the related projects would be required to provide their respective on-site and site-adjacent improvements and driveways, which would be subject to review/approval prior to construction, thereby reducing the potential for the improvements to create hazardous geometric features. Additionally, the Project's residential use is typical of the surrounding suburban area and would not introduce incompatible uses. Therefore, when combined with cumulative development, the Project's potential impacts concerning hazardous geometric design features would not be cumulatively considerable.

Emergency Access

The proposed Project would not result in inadequate emergency access. Primary vehicular access to the Project site would be provided via multiple driveways and a fire access lane throughout the townhome portion of the Project site, which would provide emergency access. The related projects would be required to show that they would not propose any features that would inhibit emergency access to nearby areas and would be subject to review/approval prior to construction



on a site-by-site basis. Further, subsequent projects would be required to comply with Gardena Public Safety Plan policies. Therefore, when combined with cumulative development, the Project would not cause a considerable impact concerning emergency access.

4.13.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning transportation have been identified.

4.13.8 REFERENCES

City of Gardena. (2020). *Gardena General Plan 2006, updated 2022*. Circulation Plan Update.

City of Gardena. (2022). *Public Safety Plan*. Retrieved from https://cityofgardena.org/wp-content/uploads/2022/04/Gardena_Public-Safety-Element_FINAL-FOR-ADOPTION.pdf.

Fehr and Peers. (2022). *South Normandie Avenue Specific Plan Project (16911 South Normandie Avenue) CEQA Transportation Impact Assessment*. San Diego, CA; see **Appendix 4.13-1: CEQA Transportation Impact Assessment**.

Fehr and Peers. (2023). *Normandie Crossing Specific Plan Local Transportation Assessment*. San Diego, CA; see **Appendix 4.13-2: Local Transportation Assessment**.



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4.14 TRIBAL CULTURAL RESOURCES



4.14 TRIBAL CULTURAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to tribal cultural resources, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on the following sources:

- *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California (Archeological Assessment); see **Appendix 4.2-1: Archaeological Resources Assessment**.
- *Tribal Cultural Resources Review* for the 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California (Tribal Cultural Resources Assessment); see **Appendix 4.14-1: Tribal Cultural Resources Assessment**.

BRC Consulting LLC conducted a third-party review of the Project's tribal cultural resources analysis on behalf of the City; see **Appendix 4.14-1**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

Additional resource information was obtained from available public resources, including among others, the Gardena General Plan 2006 (GGP). Additionally, the Native American Heritage Commission (NAHC) letter in response to the Project's Notice of Preparation (NOP), which is provided in **Appendix 1.0-1: Initial Study, Notice of Preparation and Comment Letters**, provides guidance on Assembly Bill (AB) 52 and Senate Bill (SB) 18 compliance.

Tribal cultural resources, as defined in Public Resources Code (PRC) §21074, include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

4.14.1 EXISTING SETTING

Ethnographic Overview

See also *Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project, City of Gardena, California* (SWCA 2022 [**Appendix 4.14-1**]) for the Cultural Resources Setting, and as summarized in this EIR section.



The Project site is in an area historically occupied by the Gabrielino. Surrounding Native groups included the Chumash and Tataviam/Alliklik to the north, the Cahuilla to the east, Serrano to the northeast, and the Luiseño/Juaneño to the south and southeast. In the post-European contact period, Mission San Gabriel included Natives of the greater Los Angeles area, as well as members of surrounding groups such as Kitanemuk, Serrano, and Cahuilla. There is little evidence that the people we call Gabrielino had a broad term for their group; rather, they identified themselves as an inhabitant of a specific community with locational suffixes (e.g., a resident of Yaanga was called a Yabit, much the same way that a resident of New York is called a New Yorker).

Native words suggested as labels for the broader group of Native Americans in the Los Angeles region include Tongva (or Tong-v) and Kizh (Kij or Kichereno), although there is evidence that these terms originally referred to local places or smaller groups of people within the larger group that we now call Gabrielino. Nevertheless, many present-day descendants of these people have taken on Tongva as a preferred group name because it has a Native American rather than Spanish origin. The term Gabrielino is used in the remainder of this report to designate Native American people of the Los Angeles Basin and their descendants.

The Gabrielino subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe took advantage of resources in the mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. The Gabrielino used a variety of tools and implements to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands. Gabrielino people processed food with a variety of tools, including hammer stones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels.

At the time of Spanish contact, the basis of Gabrielino religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and also taught the people how to dance, the primary religious act for this society. The religion spread south into the southern Tatic groups even as Christian missions were being built and may represent a mixture of Native and Christian belief and practices.

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior. Remains were buried in distinct burial areas, either associated with villages or without apparent village association. Cremation ashes have been found in archaeological contexts buried within stone bowls and in shell dishes, as well as scattered among broken ground stone implements. Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a



variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased.

Native American Communities in Greater Los Angeles

In general, it has proven very difficult or impossible to establish definitively the precise location of Native American villages occupied in the Ethnohistoric period. Native American place names referred to at the time of Spanish contact did not necessarily represent a continually occupied settlement within a discrete location. Instead, in at least some cases, the communities were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features subject to change over generations. Many of the villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations, at which point the former village sites were affected by urban and agricultural development, and Native American lifeways had been irrevocably changed. Alternative names and spellings for communities, and conflicting reports on their meaning or locational reference, further confound efforts at relocation. Even with archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

Existing Tribal Cultural Resources

Native American Heritage Commission Sacred Lands File (NAHC)

The NAHC Sacred Lands File (SLF) search conducted December 2021 indicated negative results **(no tribal resources at the Project site)**; see Appendix B of the *Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project, City of Gardena, California*, in **Appendix 4.2-2**.

California Historical Resources Information System (CHRIS)

No tribal cultural resources were identified within the Project site as a result of the CHRIS records search. Although the precise location of any given village is subject to speculation, it is clear the greater Los Angeles area once contained many Gabrielino villages, including several concentrated along the banks of major waterways.

The closest ethnographically documented village to the Project site may be Amupubit, which is estimated to have been located approximately 1.5 miles southeast of the site. Jautibit, another named ethnographic Native American settlement, has been mapped approximately 1.7 miles northeast and east-northeast of the Project site. Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence for the location of Native American villages has been produced to date. The Project site is in the vicinity of at least one previous Native American trade route (named "New Salt Road 1848–1878") to the north of the site. A portion of the 1769 Portolá Expedition route is located approximately 10.7 miles north of Project site.



Historical land uses at the Project site and surrounding area consisted primarily of ranching associated with the operation of Rancho San Pedro during the Spanish, Mexican, and Early American Periods. Ranching transitioned to agricultural land uses by the end of the 19th century, which included development of irrigation infrastructure. No evidence for specific intensive land uses at the Project site were identified in archival sources before the 1920s. By 1927, aerial photographs show the site developed with structures in the north and south that appear associated with agricultural land uses. The central portions of the site appear to have been subject to plow agriculture. These land uses are all likely to have disturbed the surface and near-surface sediments, which would have destroyed or displaced Native American objects that may have once been present. Between the 1940s and 1960s, the Project site was more intensively developed as buildings, structures, and various hardscaping elements were constructed, further altering the physical setting and reducing the likelihood of any tribal cultural resources being preserved in the near-surface.

Archaeological remains associated with prehistoric or historic-era Native Americans can exist below paved surfaces within developed urban settings. While the CHRIS records search results did not identify any such Native American archaeological resources within the Project site or its immediate vicinity, most of the site was not inspected for archaeological resources because of the developed nature of the property. The site has been subject to multiple episodes of ground disturbance. As a result, archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved, and although more deeply buried deposits could exist, the sensitivity for prehistoric and historic Native American archaeological resources is low to moderate.

Deeply buried archaeological deposits can exist within alluvium below historic period disturbances and may also be intermixed with historic period debris. Alluvial deposits in the Los Angeles Basin can be massive, extending hundreds of feet below the surface and containing sediments deposited long before human presence in North America. Most accumulations of alluvial sediments were formed by a combination of high- and low-energy depositional events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, whereas low-energy floods tend to produce more favorable environments for the preservation of cultural materials. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered.

Although such soil conditions are an indicator of a setting favorable for preservation, the presence of such soils alone is not an absolute indicator of the presence of tribal cultural resources. Qae alluvium, dating to greater than 12,500 years BP, is mapped within the Project site. Given the age of this formation, intact, naturally buried archaeological resources are not expected. Additionally, site disturbance associated with historic period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on the above, the sensitivity for tribal cultural resources at the Project site is considered low to moderate.



See **Section 4.2: Cultural Resources** for further information on Non-Native American Resources.

4.14.2 REGULATORY SETTING

Federal

National Historic Preservation Act of 1966

Enacted in 1966 and amended in 2000, the National Historic Preservation Act (NHPA) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage and created the Advisory Council on Historic Preservation.

State

California Environmental Quality Act

Pursuant to PRC §21084.2, a “project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.”

PRC §21074(a) defines “tribal cultural resources” as either:

- “(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of § 5020.1.
- (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 § 5024.1. In applying the criteria set forth in subdivision (c) of § 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.”

PRC §21074(b) states that a “cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.



A unique archaeological resource (PRC §21083.2(g)) or a nonunique archaeological resource (PRC §21083.2(h)) may also be a tribal cultural resource if it conforms with the criteria of PRC §21074(a).

Assembly Bill 52

On July 1, 2015, California AB 52 of 2014 was enacted and expanded CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC §21084.2).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be released. AB 52 requires that lead agencies “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the Lead Agency, in writing, to be informed by the Lead Agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.” 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. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project’s impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe.

The parties must consult in good faith, and consultation is deemed concluded when either the parties agree on measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

Traditional Tribal Cultural Places Act (Senate Bill 18)

Senate Bill (SB) 18 (California Government Code §65352.3) requires local governments to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to the adoption and amendment of general plans and specific plans. The consultation process requires (1) that local governments send the State Native American Heritage Commission (NAHC) information on a proposed project and request contact information for local Native American tribes; (2) that local governments then send information on the project to the tribes that the NAHC has identified and notify them of the opportunity to consult; (3) that the tribes have 90 days to respond on whether they want to consult or not, and (4) that consultation begins if requested by a tribe and there is no statutory limit on the duration of the consultation. If issues



arise and consensus on mitigation cannot be reached, SB 18 allows a finding to be made that the suggested mitigation is infeasible.

California Government Code §§ 6254(r) and 6254.10

California Government Code § 6254(r) explicitly authorizes public agencies to withhold information from the public relating to “Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.” § 6254.10 specifically exempts from disclosure requests for “records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the SHRC, the State Lands Commission, the NAHC, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency.”

California Health and Safety Code § 7050.5

California Health and Safety Code (CHS) § 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or site disturbance or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provision of California Government Code § 27491 or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death. If the coroner determines that the remains are that of a Native American or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

California Public Resources Code § 5097.98

Public Resources Code §5097.98 stipulates that whenever the NAHC receives notification concerning discovery of Native American human remains from a county coroner pursuant to CHS §7050.5, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the landowner’s permission, or his or her authorized representative, inspect the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with the appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. The recommendation may include the scientific removal and non-destructive analysis of human remains and items associated with Native American burials. The NAHC would designate the Most Likely Descendant (MLD) for any future human remains found in the project area.

Local



City of Gardena General Plan

The Gardena 2006 General Plan (GGP) Community Resource Element provides a Conservation Plan with the following goal and policy for the treatment of historic and cultural resources:

- **CN Goal 5:** Protect the City’s cultural resources.
 - **Policy CN 5.3:** Protect and preserve cultural resources of the Gabrielino Native American Tribe found or uncovered during construction.

4.14.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning tribal cultural resources. Criteria under CEQA states that if a project causes a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k) (see Impact 4.14-1), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (see Impact 4.14-1).

According to PRC §21084.2, a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. While what constitutes a “substantial adverse change” to a tribal cultural resource is not defined in the section, guidance on what constitutes a substantial adverse change under CEQA can be drawn from State CEQA Guidelines §15064.5(b). Although applicable specifically to historical resources (as defined in §15064.5(a)), an analogy can be drawn when assessing if there has been a substantial adverse change to a tribal cultural resource. State CEQA Guidelines §15064.5(b)(1) defines a substantial adverse change as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the historical resource. According to State CEQA Guidelines §15064.5(b)(2), the significance of a historical resource is materially impaired when a project:

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



- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC §5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC §5024.1(g), unless the public agency reviewing the effects of the Project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

In drawing an analogy, a substantial adverse change to a tribal cultural resource could be considered to be the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the tribal cultural resource.

Similarly, material impairment could include:

- Demolition or material alteration in an adverse manner those characteristics of a tribal cultural resource that justify its eligibility for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k); or
- Demolition of material alteration in an adverse manner those characteristics of a tribal cultural resource that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

PRC §21084.3 provides guidance on addressing impacts to tribal cultural resources and states that:

- Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.
- If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided in § 21080.3.2, the following are examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:
 - Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: (a) protecting the cultural character and integrity of the resource; (b) protecting the traditional use of the resource; and (c) protecting the confidentiality of the resource.



- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Protecting the resource.

State CEQA Guidelines §15370 provides additional guidance on the types of mitigation that may be considered, and includes the following: avoiding impacts altogether; minimizing impacts; rectifying impacts through repair, rehabilitation, or restoration; reducing impacts through preservation; and compensating for impacts by providing substitute resources.

PRC §21082.3(b) indicates that if a project may have a significant impact on a tribal cultural resource, the agency's environmental document shall discuss whether the proposed project has a significant impact on an identified tribal cultural resource and whether feasible alternatives or mitigation measures avoid or substantially less the impact on the identified tribal cultural resource.

PRC §21080.3.2 indicates that as part of the consultation pursuant to §21080.3.1, California Native American tribes may propose mitigation measures, including, but not limited to, those recommended in §21084.3, capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource. Also, the lead agency may incorporate changes or additions to a project even if not legally required to do so.

4.14.4 IMPACTS AND MITIGATION MEASURES

Impact 4.14-1:

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

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or**
- b) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Level of Significance: Less Than Significant Impact With Mitigation Incorporated

Tribal Cultural Sites



No tribal cultural resources were identified at the Project site as a result of the CHRIS records search or the NAHC's SLF search. The closest ethnographically documented village to the Project site is located approximately 1.5 miles southeast of the site. Aside from the ethnographic evidence suggesting the location of this village, little direct, indisputable archaeological evidence for the location of Native American villages has been produced to date. The Project site is in the vicinity of at least one previous Native American trade route (named "New Salt Road 1848–1878") to the north and a portion of the 1769 Portolá Expedition route is located approximately 10.7 miles to the north.

Therefore, the Project would not cause a substantial adverse change in the significance of a known tribal cultural resource site, feature, place, or cultural landscape as no such resources have been identified within the Project site. Additionally, the Project would not cause a substantial adverse change in the significance of a known tribal cultural resource which is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or a resource determined by the lead agency as no such resources have been identified within the Project site.

However, archaeological remains associated with prehistoric or historic-era Native Americans can exist below paved surfaces within developed urban settings. While the CHRIS records search results did not identify any such Native American archaeological resources within the Project site or its immediate vicinity, most of the site was not inspected for archaeological resources due to the developed nature of the property. The site has been subject prior ground disturbance such that any archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved. More deeply buried deposits could exist; the sensitivity for prehistoric and historic Native American archaeological resources is considered low to moderate.

Notwithstanding and as discussed below, the Kizh Nation provided tribal archive information to the City to identify high cultural sensitivity of the Project location and why they have concerns for subsurface ground disturbance activities that may impact tribal cultural resources.

Pursuant to AB 52 requirements, on March 9, 2022, the City of Gardena notified the designated contact of, or a tribal representative of, California Native American tribes that are traditionally and culturally affiliated with the Project's geographic area and that have requested notification of projects being considered by the City, pursuant to PRC §21080.3.1.

The following tribal contacts were informed:

- Andrew Salas, Chairperson of the Gabrieleno Band of Mission Indians - Kizh Nation
- Mr. Charles Alvarez of the Gabrielino-Tongva Tribe
- Mr. Sam Dunlap of the Gabrielino-Tongva Tribe



The letters included a description of the Project, a map depicting the Project location, and the City's contact information. Recipients were requested to respond within 30 days should they wish to consult under AB 52.

On August 17, 2022, the City received one request for consultation under AB 52 from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation). Tribal representatives expressed concerns should subsurface activities be associated with the Project. The Kizh Nation provided their knowledge of the Project site vicinity, including information about the natural environment and the area's general history, and known villages and trade routes in the larger area. During the consultation call and in subsequent email communication, the Kizh Nation indicated that the Project site has a high sensitivity for the presence of unknown, subsurface archaeological resources; also see **Section 4.3: Cultural Resources**, for a discussion of the potential for encountering subsurface archaeological resources during ground disturbance. The Kizh Nation provided tribal archive information to the City to identify high cultural sensitivity of the Project location and why they have concerns for subsurface ground disturbance activities that may impact tribal cultural resources, which are included in **Appendix 1.0-1** of this EIR.

During the consultation, the Kizh Nation representatives did not identify any known tribal cultural resources (as defined in PRC §21074) at the Project site, nor did they provide substantial evidence to support an impact. Notwithstanding, the Applicant agreed to the imposition of a mitigation measure requiring monitoring during construction. In subsequent correspondence dated August 17, 2022, the Kizh Nation provided mitigation recommendations. On June 15, 2023, the City accepted the proposed mitigation measures and concluded the consultation.

The Kizh Nation identified measures to mitigate potential impacts to as-yet undiscovered tribal cultural resources. The mitigation measures include requirements for retaining a Native American Monitor Prior to Commencement of Ground Disturbing Activities (MM TCR-1), procedures in the event of an unanticipated discovery of human remains and associated funerary objects (MM TCR-2), and procedures for burials and funerary remains (MM TCR-3). Following compliance with MMs TCR-1 through TCR-3, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. With mitigation, impacts would be less than significant.

Senate Bill 18 Consultation

On March 9, 2022, the City notified the designated contact of, or a tribal representative of, California Native American Tribes that are on the Tribal Consultation List maintained by the California NAHC. In compliance with SB 18 requirements, and as Lead Agency, the City extended an invitation to consult on the Project. This consultation was intended to assist with identifying and/or preserving and/or mitigating potential Project impacts to Native American cultural places.



Letters were sent by certified mail and email to the following:

- Mrs. Lovina Redner, Tribal Chair of the Santa Rosa Band of Cahuilla Indians
- Mr. Andrew Salas, Chairperson of the Gabrieleno Band of Mission Indians - Kizh Nation
- Mr. Isaiah Vivanco, Chairperson of the Soboba Band of Luiseno Indians
- Mr. Joseph Ontiveros of the Soboba Band of Luiseno Indians
- Mr. Charles Alvarez of the Gabrielino-Tongva Tribe
- Mrs. Christina Conley, Tribal Consultant and Administrator of the Gabrielino Tongva Indians of California Tribal Council
- Mr. Robert Dorame, Chairperson of the Gabrielino Tongva Indians of California Tribal Council
- Mr. Sam Dunlap of the Gabrielino-Tongva Tribe
- Ms. Sandonne Goad, Chairperson of the Gabrielino/Tongva Nation
- Mr. Anthony Morales, Chairperson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians

The letters included a description of the Project, a map depicting the Project location, and the City's contact information. Recipients were requested to respond within 90 days should they wish to consult under SB 18. No responses were received requesting consultation. As previously noted, consultation was conducted with the Kizh Nation as a part of AB 52 consultation.

Therefore, with incorporation of mitigation, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource site, feature, place, or cultural landscape. Additionally, with incorporation of mitigation the Project would not cause a substantial adverse change in the significance of a tribal cultural resource which is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or a resource determined by the lead agency.

Mitigation Measures

MM TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities:

- A. The Applicant/lead agency 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.

- B. A copy of the executed monitoring agreement shall be submitted to the lead agency 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.
- C. The monitor will 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 will 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 will be provided to the Applicant/lead agency upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency 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 monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.
- E. Upon discovery of any TCRs or archaeological resources, 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 monitor and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983).
 - If the resources are Native American in origin, 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.
 - If the archaeologist determines that the resource contains a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be made available. The treatment plan shall



be in accordance with CEQA Guidelines §15064.5(f) for historical resources and Public Resources Code §21083.2(b) for unique archaeological resources. If not left in place, any historic or archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum at the University of California Los Angeles, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society for educational purposes.

MM TCR-2 Unanticipated Discovery of Human Remains and Associated Funerary Objects

- A. 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 § 5097.98, are also to be treated according to this statute.
- B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 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 § 5097.98 shall be followed.
- C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2).
- D. 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 monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).)
- E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM TCR-3 Procedures for Burials and Funerary Remains. This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant (“MLD”) by the NAHC:



- A. 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.
- B. 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.
- C. 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.
- D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should 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.
- E. In the event preservation in place is not possible despite good faith efforts by the 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.
- F. 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.
- G. 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.

4.14.5 CUMULATIVE IMPACTS

For purposes of the tribal cultural resources impact analysis, cumulative impacts are considered for cumulative development within a 0.5-mile radius for tribal cultural resources, according to the related projects; see **Table 3-2: Geographic Context for Cumulative Analysis**. As indicated in **Table 3-1: List of Cumulative Projects** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are five related projects within the geographic context for the cultural resources analysis: Related Project No. 2 (a multi-family condominium approximately 0.14 mile to the northeast); Related Project No. 3 (a small lot subdivision with three-story dwelling units approximately 0.08 mile to the northeast); Related Project No. 12 (a self-storage/warehouse development approximately 0.30 mile to the south); Related Project No. 15 (a townhome development approximately 0.50 mile to the south); and Related Project No. 16 (a mixed use development, including apartments and commercial retail and office space, approximately 0.30 mile to the north). As concluded above, the Project would not cause an adverse change in the significance of a tribal cultural resource defined in PRC §21074, as none are present on the Project site. Therefore, no cumulative impact concerning tribal cultural resources would occur.

As concluded above, the potential exists for undiscovered tribal cultural resources to be adversely impacted during Project construction. With implementation of MMs TCR 1 through 3, the Project would not cause a substantial adverse change in the significance of these resources; a less than significant impact with mitigation incorporated would occur in this regard.

Future cumulative development projects could encounter tribal cultural resources during ground disturbing activities. Thus, the potential exists for cumulative development to result in the adverse modification or destruction of tribal cultural resources. Potential tribal cultural resource impacts associated with the individual developments would be specific to each site. As with this Project, all cumulative development in the area would undergo environmental and design review on a project-by-project basis pursuant to CEQA, AB 52, and SB 18, to evaluate the potential for impacts to tribal cultural resources. All cumulative development would be subject to compliance with the existing federal, state, and local regulatory framework concerning the protection of tribal cultural resources on a project-by-project basis, including consultation with tribes to identify whether a site may contain tribal cultural resources and if so, what mitigation measures may be required. Additionally, implementation of site-specific mitigation measures would reduce



potential project impacts to as-yet unidentified tribal cultural resources to less than significant levels.

Similarly, all future development with the potential to impact tribal cultural resources would be required to demonstrate compliance with applicable federal and state regulatory requirements, including General Plan goals and policies of the affected jurisdiction, intended to reduce and/or avoid potential adverse environmental effects. As such, cumulative impacts to tribal cultural resources would be mitigated on a project-by-project level, and in accordance with the established regulatory framework, through the established regulatory review process.

Therefore, the combined cumulative impacts to tribal cultural resources associated with the Project's incremental effects and those of the cumulative projects would be less than significant following compliance with the established regulatory framework and with mitigation incorporated.

4.14.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to tribal cultural resources have been identified.

4.14.7 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006*. Retrieved from <https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan7.pdf>.

Salas, A. (2022). Personal communication, August 17, 2022.

SWCA. (2022). *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California; see **Appendix 4.2-1: Archeological Resources Assessment**.

SWCA. (2022). *Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project*, City of Gardena, California; see **Appendix 4.14-1: Tribal Cultural Resources Assessment**.

An architectural rendering of a modern multi-story apartment building. The building features a central courtyard with a swimming pool, lounge chairs, and a small table. The pool is surrounded by a wooden deck and a glass railing. The building has a mix of white and grey facades with large windows and balconies. In the foreground, there are several rooftop terraces with wooden decking and some greenery. The overall scene is bright and clear, suggesting a sunny day.

4.15 UTILITIES AND SERVICE SYSTEMS



4.15 UTILITIES AND SERVICE SYSTEMS

The purpose of this section is to describe the existing utility and service system-related environmental and regulatory settings and evaluate the Project's potential to result in significant environmental effects due to relocation or construction of new or expanded utilities or service systems (i.e., water, wastewater, wastewater treatment, electric power, natural gas, and telecommunications facilities), the relocation or construction of which could cause significant environmental effects; have sufficient water supplies available to serve the Project and reasonably foreseeable future development; result in a determination by the wastewater treatment provider that it has inadequate wastewater treatment capacity to serve the Project; generate solid waste in excess of state or local standards or in excess of the capacity local infrastructure; and/or conflict with solid waste management and reduction strategies and regulations. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based on utilities and service systems data provided in the following documents:

- Water and Wastewater Technical Report (Fusco Engineering, April 4, 2023); see **Appendix 4.15-1: Water and Wastewater Technical Report**.
- Water Resources Technical Report (Fusco Engineering, April 4, 2023); see **Appendix 4.7-1: Water Resources Technical Report**, and
- Energy Assessment (Kimley-Horn, May 17, 2023); see **Appendix 4.3-1: Energy Assessment**.

Information in this section is also based on readily available public resources, including among others, annual reports, and average usage information from utility providers whose service area includes the Project site.

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Water and Wastewater Technical Report and Water Resources Technical Report on behalf of the City; see **Appendix 4.15-1** and **Appendix 4.7-1**, respectively. The third-party review concluded the analyses meet the applicable provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.15.1 EXISTING SETTING

Water

Golden State Water Company (GSWC) supplies water to the Project site. The Project site is within GSWC's Southwest system service area (GSWC Southwest). GSWC Southwest serves the cities of Gardena and Lawndale, as well as portions of the cities of Carson, Compton, El Segundo, Redondo Beach, Hawthorne, and Inglewood and unincorporated County of Los Angeles (County).



Water Supply and Demand

Various water supply sources are available to GSWC to serve GSWC Southwest: adjudicated groundwater supplies, leased or purchased groundwater supplies, purchased water from Central Basin Municipal Water District (“CBMWD”) and West Basin Municipal Water District (“WBMWD”), and recycled water. GSWC Southwest also maintains emergency connections with neighboring agencies that allow it access to additional water sources or water in emergency conditions.

Adjudicated Groundwater Supplies

The Project site and City overlie the Los Angeles Coastal Plain Groundwater Basin (Coastal Plain Basin), which consists of four major subbasins: Hollywood, Santa Monica, Central, and West Coast. The Project site is within the West Coast Subbasin. The Southwest System is supplied by two active, GSWC-owned Central Subbasin wells, and 12 active, GSWC-owned West Coast Subbasin wells. The West Coast [Sub]Basin was adjudicated in 1961 (Superior Court, County of Los Angeles, Case No 506806). The West Coast Basin Judgment (West Judgment) limits the amount of groundwater each party can extract annually from the West Coast [Sub]Basin. Groundwater producers held by the West Judgment have the right to annually pump the volume of water as decided in the adjudication. These limits are monitored by a court-appointed Watermaster.

Leased or Purchased Groundwater Supplies

GSWC purchases water from Central Basin Municipal Water District (CBMWD) and West Basin Municipal Water District (WBMWD). CBMWD is a wholesale water agency that purchases potable water supplies from the Metropolitan Water District of Southern California and recycled water supplies from Los Angeles County Sanitation Districts (LACSD) to distribute both within and outside the CBMWD service area. The WBMWD imports water from Metropolitan Water District of Southern California and delivers these supplies to investor-owned utilities, municipalities, a county waterworks district, and a groundwater agency to supplement locally available supplies.

Recycled Water Supplies

The GSWC Southwest system service area currently receives recycled water from the WBMWD as part of the district’s West Basin Recycled Water Project. The recycled water produced by WBMWD is used throughout the region for uses such as landscape irrigation, industrial applications, and other purposes such as groundwater injections to control seawater intrusion. WBMWD owns all of the existing recycled water pipelines that fall within the boundaries of the GSWC Southwest service area, and WBMWD is planning to expand its distribution system to continue offsetting potable water demands.



Existing Onsite Water Demand

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping **Table 4.15-1: Estimated Existing Water Demand** presents the Project site’s estimated existing water demand and indicates it totals 12,732 gallons per day (gpd).

Table 4.15-1: Estimated Existing Water Demand

Land Use	Building Square Footage ¹	Average Daily Water Demand Factor ² (gpd per 1,000 SF) ³	Total Average Daily Water Demand (gpd)
Industrial ⁴	106,100	120	12,732
Total Existing Water Demand			12,732
Notes:			
1 See Table 2-1: Existing Onsite Structure Summary .			
2 Based on 120% of the wastewater generation factors from the “Estimated Average Daily Sewage Flows for Various Occupancies” document from LA County Public Works as the water meter records from the water purveyor (GSWC) was unable to provide this data.			
3 Gpd = gallons per day; SF = square feet.			
4 The specific industrial/warehouse occupancy type does not exist within the “Estimated Average Daily Sewage Flows for Various Occupancies” document; therefore, the “Commercial Shops and Stores” factor was used as the basis of design.			
Source: Appendix 4.15-1 , Table 1.			

Future Water Demands and Supplies

GSWC’s *Final Urban Water Management Plan – Southwest 2020* (UWMP) is written as a water resource planning tool to effectively manage water supply, reliability, and demand. The UWMP draws on local, regional, and statewide inputs presents data and analyses as required by the California Department of Natural Resources and the CWC since 2015.¹ **Table 4.15-2: Normal and Single Dry Year Water Supply and Demand Through 2045 (AFY)** and

Table 4.15-3: Five Consecutive Dry Years Water Supply and Demand Through 2045 (AFY) present the Southwest System’s normal year, single dry-year, and multiple dry-year water demands through 2045. UWMP water demand forecasts are based on adopted general plans. UWMP Tables 5-2 and 5-3 show that water supplies would meet the service area’s water demands for normal, single-dry, and multiple dry-year conditions through 2045. GSWC would meet future water demand through purchasing water from CBMWD and WBMWD.

¹ Golden State Water Company. (2020). *2020 Urban Water Management Plan Southwest Service Area*. Page 1-2.



Table 4.15-2: Normal and Single Dry Year Water Supply and Demand Through 2045 (AFY)

	2025	2030	2035	2040	2045
Normal Year					
Service Area Supply	26,939	27,347	27,761	28,181	28,608
Service Area Demand	26,939	27,347	27,761	28,181	28,608
Difference	0	0	0	0	0
Single Dry Year					
Service Area Supply	5,620	5,668	5,716	5,764	5,813
Service Area Demand	5,620	5,668	5,716	5,764	5,813
Difference	0	0	0	0	0

Source: Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*, Table 5-2.

Table 4.15-3: Five Consecutive Dry Years Water Supply and Demand Through 2045 (AFY)

		2025	2030	2035	2040	2045
Year 1	Service Area Supply	29,633	30,082	30,537	31,000	31,469
	Service Area Demand	29,633	30,082	30,537	31,000	31,469
	Difference	0	0	0	0	0
Year 2	Service Area Supply	29,722	30,172	30,629	31,093	31,469
	Service Area Demand	29,722	30,172	30,629	31,093	31,469
	Difference	0	0	0	0	0
Year 3	Service Area Supply	29,812	30,263	30,721	31,187	31,469
	Service Area Demand	29,812	30,263	30,721	31,187	31,469
	Difference	0	0	0	0	0
Year 4	Service Area Supply	29,902	30,354	30,814	31,280	31,469
	Service Area Demand	29,902	30,354	30,814	31,280	31,469
	Difference	0	0	0	0	0
Year 5	Service Area Supply	29,992	30,446	30,907	31,375	31,469
	Service Area Demand	29,992	30,446	30,907	31,375	31,469
	Difference	0	0	0	0	0

Source: Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*, Table 5-3.

Water Infrastructure

GSWC-Southwest is located in southwestern Los Angeles County and serves the Cities of Gardena and Lawndale; parts of the cities of Carson, Compton, El Segundo, Redondo Beach, Hawthorne, and Inglewood; and the adjacent unincorporated communities of Athens, Del Aire, El Camino Village, Lennox, and Gardena Heights.



The Project site is currently served by a public GSWC 8-inch water line that runs within the South Normandie Avenue right-of-way (ROW), east of the Project site. There is also an existing 8-inch water line along West 170th Street, south of the Project site and an existing 4-inch water line on Brighton Way, west of the Project site.

There are two fire hydrants in the Project's vicinity: one hydrant is near the West 169th Street at South Normandie Avenue intersection; and the second hydrant is along South Normandie Avenue, approximately 245 feet north of West 170th Street. These two existing fire hydrants are serviced by the 8-inch main water line in South Normandie Avenue.

Wastewater

Local Wastewater Facilities. The City provides sewer services to its residential, commercial, and industrial customers within City limits. The City's wastewater collection system includes over 88 miles of gravity sewer lines, among other facilities. The City's local sewers discharge at over 100 locations along various LACSD interceptors. City of Gardena Sewer Master Plan Figure ES.1: Existing Collection System depicts and Table ES.3: Detailed Capital Improvement Program describes the existing wastewater collection system within City limits. As indicated, there are two sewer lines within the South Normandie Avenue ROW along the Project site's eastern frontage: an 8.0-inch diameter City/local sewer gravity main pipeline; and a LACSD regional trunk sewer (i.e., Gardena Pump Trunk Sewer). Additionally, there are three existing sewer house laterals at the Project site, which connect to the Gardena Pump Trunk Sewer,² but not to the City's 8.0-inch diameter local sewer gravity main pipeline. See also *LACSD Wastewater Facilities Section* below.

LACSD Wastewater Facilities. The Project site is within the jurisdictional boundaries of LACSD, which consist of 24 districts that encompass 78 cities, including Gardena, and unincorporated County areas. The Project site is within LACSD District No. 5. LACSD operates and maintains facilities that collect and treat domestic and industrial wastewater (i.e., sewage). LACSD operates and maintains the regional wastewater collection system, which includes approximately 1,400 miles of sewers, 49 pumping plants, and 11 wastewater treatment plants.³

As previously mentioned, there are three existing sewer house laterals connecting from the Project site to LACSD's Gardena Pump Trunk Sewer, which has a 17.1-inch diameter, with total capacity of 2.2 million gallons per day (mgd) and a peak flow of 1.7 mgd when last measured in 2017.⁴ The Gardena Pump Trunk Sewer continues underneath South Normandie Avenue to the south and then connects to a network of sewer lines that ultimately convey wastewater to LACSD's Joint Water Pollution Control Plant (JWPCP).

The JWPCP, which is in the City of Carson approximately 5.8 miles south of the Project site, currently processes an average wastewater flow of 243.1 mgd and has a total permitted capacity

² Fuscoe Engineering. (April 2023). *Water And Wastewater Technical Report: Normandie Crossing Specific Plan Project at 16911 S Normandie Ave, Gardena, California 90247*. Page 8; see **Appendix 4.15-1**.

³ Los Angeles County Sanitation Districts. (No Date). *Our Agency*. Retrieved from: <https://www.lacsd.org/about-us/who-we-are/our-agency>, accessed May 2023.

⁴ Huffman, Mandy, Los Angeles County Sanitation District, personal communication, June 7, 2023.



of 400 mgd.⁵ LACSD’s 2019 Annual Report notes that a pilot project to provide up to 500,000 mgd day of recycled water for indirect potable reuse was implemented at the JWPCP, with plans for full implementation in the future.

Existing Wastewater Generation

Table 4.15-4: Estimated Existing Wastewater Generation identifies the Project site’s estimated existing wastewater generation and indicates it totals approximately 10,610 gpd, with an estimated daily peak flow that totals 26,525 gpd.

Table 4.15-4: Estimated Existing Wastewater Generation

Land Use	Building Square Footage: 2030	Estimated Average Daily Sewage Flow Factor (gal/1000 SF gross area) ¹	Total Wastewater generation (gpd)	Estimated Daily Peak Flow (gpd) ²
Industrial	106,100	100	10,610	26,525
Total Existing Wastewater Generation			10,610	26,525
Note: ¹ Based on the wastewater generation factors from the “Estimated Average Daily Sewage Flows for Various Occupancies” document from LA County Public Works. Because the Estimated Average Daily Sewage Flows for Various Occupancies document does not specifically identify “warehouse” as an occupancy type, the Commercial Shops and Stores occupancy type was used as the basis of design. ² Estimated Daily Peak Flow (gpd) = Average Daily Flow * 2.5				
Source: Appendix 4.15-1 , Table 2.				

Stormwater and Drainage

See **Section 4.8: Hydrology and Water Quality**, for existing conditions concerning stormwater and drainage facilities.

Electric Power, Natural Gas, and Telecommunications

Southern California Edison (SCE) provides Electric power to the Project area and Southern California Gas Company (SoCalGas) provides natural gas. Various companies provide telecommunications including AT&T, Direct TV, Dish Network, Time Warner Cable, Verizon, and ViaSat. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, inclusive of the Project site.

Electric Power – Existing Demand and Infrastructure

The site is currently served by overhead power lines on the west side of South Normandie Avenue, West 170th Street, and Brighton Way that are owned and maintained by SCE.

Table 4.15-5: Estimated Existing Electrical Demand presents the Project site’s estimated existing electrical power demand and indicates it totals 875,071 Kilowatt hours (kWh) per year.

⁵ Ibid.



Table 4.15-5: Estimated Existing Electrical Demand

Land Use	Electricity (kWh/year) ^{1,2}
Refrigerated Warehouse Rail	147,806
Unrefrigerated Warehouse Rail	323,613
Unrefrigerated Warehouse No Rail	84,173
Operational Water	319,479
Total Estimated	875,071
Notes:	
¹ CalEEMod was used to calculate the electrical power demand based on the existing industrial land use.	
² Kilowatt hours (kWh)	
Source: Appendix 4.3-1.	

Natural Gas – Existing Demand and Infrastructure

The Project site is currently served by natural gas and there is existing infrastructure owned and maintained by SoCalGas on the Project site. There is a 20-inch transmission line in West 190th Street approximately 1.3 miles south of the Project site.⁶ **Table 4.15-6: Estimated Existing Natural Gas Usage** presents the Project site’s estimated existing natural gas demand and indicates it totals 392,942 thousand British thermal units per year (kBTU/yr).

Table 4.15-6: Estimated Existing Natural Gas Usage

Land Use	Natural Gas (kBTU/yr) ^{1,2}
Refrigerated Warehouse Rail	6,042
Unrefrigerated Warehouse Rail	307,038
Unrefrigerated Warehouse No Rail	79,862
Total Estimated	392,942
Notes:	
¹ CalEEMod was used to calculate the natural gas demand based on the existing industrial land use.	
² Thousand British thermal units per year (kBTU/yr)	
Source: Appendix 4.3-1.	

Solid Waste

Waste Resources of Gardena (Waste Resources) provides solid waste and recycling services for the City’s residential, commercial, and industrial customers, including the existing onsite land uses. Waste Resources uses the Chiquita Canyon Sanitary Landfill for non-recyclable municipal solid waste disposal by way of its transfer station Waste Resources Recovery, at 357 West Compton Boulevard, in the community of West Rancho Dominguez. Construction and demolition debris are sent either directly to a recycling partner or to California Waste Services for sorting and recycling.⁷ The solid waste is disposed of at the Chiquita Canyon Sanitary Landfill (Chiquita).

⁶ Southern California Gas Company. (2023). *Gas Transmission Pipeline Interactive Map – Los Angeles*. Retrieved from: [Gas Transmission Pipeline Interactive Map - Los Angeles \(arcgis.com\)](https://www.socalgas.com/gas-transmission-pipeline-interactive-map-los-angeles), accessed May 2023.

⁷ City of Gardena. (2022). *Amended and Restated Agreement Between City of Gardena and Waste Resources of Gardena for Integrated Solid Waste Management Services*



The Chiquita Canyon Sanitary Landfill is a 639-acre landfill in Castaic, California. This facility accepts only non-hazardous solid waste for disposal. Solid waste received at this facility consists of municipal solid waste, residential and commercial waste, including yard waste, green waste (for composting or for recycling), clean fill soil and construction/demolition debris.⁸ CalRecycle reports Chiquita has a maximum permitted throughput of 12,000 tons per day (tpd) and a maximum permitted capacity of 110,366,000 cubic yards.⁹ Chiquita's remaining capacity was estimated to total 60,408,000 cubic yards, as of August 24, 2018.

4.15.2 REGULATORY SETTING

Water Supply

Federal

Safe Drinking Water Act

The U.S. EPA administers the Safe Drinking Water Act (SDWA), the primary federal law that regulates drinking water quality and establishes standards to protect public health and safety. The Water Resources Control Board's Division of Drinking Water State Department of Health Services (DHS) implements the SDWA and oversees public water system quality statewide. The DHS State Water Resources Control Board (SWRCB) establishes legal drinking water standards for contaminants that could threaten public health. Title 40 Code of Federal Regulations (CFR) Part 503, Standards for the Use or Disposal of Sewage Sludge establishes standard for the final use or disposal of sewage sludge generated during the treatment of domestic sewage in a treatment works. Title 23 California Code of Regulations (CCR), and standards established by the Regional Water Boards coordinate to regulate the disposal of biosolids. RCRA Title 42 of the United States Code §6901 et seq. contains regulations for municipal solid waste landfills.

State

Water Conservation Act of 2009

The Water Conservation Act of 2009 (often referred to as "SB X7-7" or the "20 by 2020 law") requires all water suppliers to increase water use efficiency. The legislation sets an overall goal of reducing per capita water use by 20 percent by 2020, with an interim goal of a 10 percent reduction in per capita water use by 2015. Effective in 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for state water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards; it also requires that agricultural water suppliers prepare plans and implement efficient water management practices.

⁸ Waste Connections, Inc. (2019). *About Chiquita Canyon*. Retrieved from: <https://chiquitacanyon.com/about/>, accessed May 2023.

⁹ California Department of Resources Recycling and Recovery. (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>, accessed May 2023.



California Urban Water Management Act

The California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, §§10610-10656) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires water suppliers to prepare an Urban Water Management Plan (“UWMP”) every five years to identify short-term and long-term water demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 AFY of water must adopt an UWMP. GSWC is operating based on their 2020 UWMP, which was adopted on July 15, 2021.

Sustainable Groundwater Management Act

Three bills collectively known as the Sustainable Groundwater Management Act (SGMA) were passed in 2014: Assembly Bill (AB) 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley).¹⁰ These bills provided a framework for sustainable groundwater management, which is defined as “management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.”

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as high or medium priority. The Project site is in a very low priority basin.¹¹

SGMA also 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. The Southwest System where the Project site is located is supplied by two active, GSWC-owned wells in the Central Basin, and 12 active, GSWC-owned wells in the West Coast Basin. GSWC monitors well capacity, status, and water quality. Under the SGMA, the Central Basin and West Coast Basin are exempt from the requirement to form a GSA, since they are adjudicated basins. See also **Section 4.8: Hydrology and Water Quality**.

Porter-Cologne Water Quality Control Act

In California, the SWRCB is responsible for ensuring the highest reasonable quality of waters of the state, while allocating those waters to achieve the optimum balance of beneficial uses. The 1969 Porter-Cologne Water Quality Control Act, codified in the CWC, authorizes the SWRCB to implement programs to control polluted discharges into state waters. This law implements the

¹⁰ State Water Resources Control Board. (2023). *Sustainable Groundwater Management Act Development*. Retrieved from [What is SGMA? | California State Water Resources Control Board](#), accessed May 2023.

¹¹ California Department of Water Resources. (2020). *Basin Prioritization Dashboard*. Retrieved from <https://gis.water.ca.gov/app/bp-dashboard/final/>, accessed May 2023.



requirements of the Clean Water Act (CWA). Pursuant to this law, the local Regional Water Quality Control Board (RWQCB) is required to establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge. The Los Angeles RWQCB regulates wastewater discharges and water quality in the southern/coastal portions of Los Angeles County, including the Project site.

On May 2, 2006, the SWRCB adopted statewide General Waste Discharge Requirements (WDRs) and a Monitoring and Reporting Program (MRP) for sanitary sewer systems. The regulations were in response to growing public concern about the water quality impacts of sanitary sewer overflows, particularly those that cause beach closures, adversely affect other bodies of water, or pose serious health and safety or nuisance problems. The MRP underwent revision in 2013; a summary of revisions incorporated into the final revised MRP is provided at: https://www.waterboards.ca.gov/water_issues/programs/sso/docs/fs_wqo20130058.pdf.

California Code of Regulations Title 20 (Public Utilities and Energy)

California Code of Regulations (CCR) Title 20 includes federal and state minimum efficiency requirements for energy and water use in regulated appliances. These appliances include, but are not limited to, water heaters, furnaces, heat pumps, air conditioners, refrigerators, pumps, lamps and ballasts, computers, spray sprinkler bodies and showerheads. In addition, the following Title 20 regulations require water-efficient plumbing fixtures in structures:

CCR Title 20 §1604(h) – Plumbing Fittings. This regulation establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, sink faucets, and tub spout diverters.

CCR Title 20 §1606(i) – Plumbing Fixtures. This regulation prohibits the sale of fixtures that do not comply with established efficiency regulations.

California Code of Regulations Title 24 (California Building Standards Code)

CCR Title 24, also known as the California Building Standards Code (CBSC), includes regulations for how buildings are designed and constructed, and are intended to ensure the maximum structural integrity and safety of private and public buildings. The CBSC is comprised of 12 "Parts." The CBSC Parts relevant to utilities and service systems are described below.

Title 24 Part 3 - California Electrical Code. The California Electrical Code (CEC) contains electrical design and construction standards.

Title 24 Part 5 - California Plumbing Code. The California Plumbing Code (CPC) contains plumbing design and construction standards. The CPC also) promotes water conservation.

Title 24 Part 6 - California Energy Code. The California Energy Code contains energy conservation standards applicable to all residential and non-residential buildings throughout California, including schools and community colleges.



Title 24 Part 11 - California Green Building Standards (CALGreen Code). The CALGreen Code contains standards applicable to residential and non-residential buildings throughout California, including schools and community colleges. The CALGreen Code is intended to improve public health, safety, and public welfare through sustainable construction practices. The sustainable practices are applied to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides a waste reduction requirement of 65 percent of nonhazardous C&D waste.

California Health and Safety Code

California Health and Safety Code §17921.3(b) requires: (1) All water closets sold or installed in California to use no more than an average of 1.6 gallons per flush. On and after January 1, 2014, all water closets, other than institutional water closets, sold or installed in California are required to be high-efficiency water closets; and (2) All urinals sold or installed in California to use no more than an average of one gallon per flush. On and after January 1, 2014, all urinals, other than blow-out urinals, sold or installed in California are required to be high-efficiency urinals.

Assembly Bill 1668 and Senate Bill 606

AB 1668 and SB 606 created a new foundation for long-term improvements in water conservation and drought planning. SB 606 and AB 1668 establish guidelines for efficient water use and a framework for implementation and oversight of the new standards, which was required to be in place by 2022. The two bills include the following provisions:

- Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers, composed of indoor residential water use; outdoor residential water use; commercial, industrial, and institutional irrigation with dedicated meters; water loss; and other unique local uses;
- Providing incentives for water suppliers to recycle water;
- Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and providing recommendations for drought planning; and
- Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

Senate Bill 610

Senate Bill 610 codified in California Public Resources Code (PRC) §21151.9, requires the preparation of “water supply assessments” (WSA) for large developments to ensure that long-term water supplies are sufficient to meet the project’s demands in normal, single dry, and multiple dry years for a period of 20 years for all projects that propose at least the following:



- A proposed residential development of more than 500 dwelling units (DU);
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; or
- A mixed-use project that includes one or more of the projects specified in the above bullets.

These assessments, prepared by public water systems responsible for service, address whether adequate existing or projected water supplies are available to serve proposed projects, in addition to urban and agricultural demands and other anticipated development in the service area in which the project is located.

Where a WSA concludes that insufficient supplies are available, it must describe steps that would be required to obtain the necessary supply. The content requirements for the WSA include identification of existing and future water suppliers and quantification of water demand and supply by source in five-year increments over a 20-year projection. This information must be provided for average normal, single-dry, and multiple-dry years. The absence of an adequate current water supply does not preclude project approval but does require a lead agency to address a water supply shortfall in its project approval findings.

Local

Gardena General Plan 2006

The Gardena 2006 General Plan (GGP) Community Resources Element provides a Conservation Plan with the following goal and policies for enhancement and maintenance of water supply.

CN Goal 2: Conserve and protect groundwater supply and water resources.

- **Policy CN 2.2:** Comply with the water conservation measures set forth by the California Department of Water Resources.
- **Policy CN 2.6:** Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

Gardena Municipal Code (GMC) §8.70 – Stormwater and Runoff Pollution Control

Gardena Municipal Code (GMC) Chapter 8.70 provides an overview of the City's regulations concerning stormwater and runoff pollution control. The purpose of this chapter is to protect the



public health, welfare, and safety and to reduce the quantity of pollutants being discharged to the waters of the U.S. through:

- A. The elimination of non-stormwater discharges to the municipal stormwater system;
- B. The elimination of the discharge of pollutants into the municipal storm drain system;
- C. The reduction of pollutants in stormwater discharges to the maximum extent practicable;
- D. 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.¹²

Wastewater

Federal

Clean Water Act/National Pollutant Discharge Elimination System

The CWA (33 U.S.C. §1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the U.S. and has given the U.S. Environmental Protection Agency (U.S. EPA) the authority to implement pollution control programs. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402).

In California, NPDES permitting authority is delegated to, and administered by, nine RWQCBs. The Project is within jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The City operates under Municipal Regional Stormwater NPDES Permit (Order No. R4-2012-0175-A01, NPDES Permit No. CAS004001). This Permit provides the discharge requirements for the MS4 discharges within the Los Angeles County watersheds.

Clean Water Act Section 402

Section 402 of the Clean Water Act authorizes the SWRCB to issue NPDES Construction Stormwater General Permit (Water Quality Order 99-08-DWQ), referred to as the "Construction Stormwater General Permit." Construction activities can comply with and be covered under the Construction Stormwater General Permit provided they:

1. Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that would prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;

¹² City of Gardena. (2020). *Gardena Municipal Code, Chapter 8.70 Stormwater Runoff and Pollution Control*. Retrieved from <https://www.codepublishing.com/CA/Gardena/#!/html/Gardena08/Gardena0870.html>, accessed May 2023.



2. Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
3. Perform inspections of all BMPs.

The SWPPP must contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the construction site discharges directly to a water body listed on the 303(d) list for sediment. Increased compliance tasks under the adopted 2022 Construction Stormwater General Permit include project risk evaluation, effluent monitoring, receiving water monitoring, electronic data submission of the SWPPP and all other permit registration documents, and a Rain Event Action Plan (REAP), which must be designed to protect all exposed portions of a project site within 48 hours prior to any likely precipitation event.

Clean Water Act Section 303(d)

CWA Section 303(d) (CWA, 33 USC 1250, et seq., at 1313(d)) requires states to identify “impaired” water bodies as those which do not meet water quality standards. States are required to compile this information in a list and submit the list to U.S. EPA for review and approval. An affected waterbody, and associated pollutant or stressor, is then prioritized in a list of impaired water bodies known as the 303(d) List. The CWA further requires the development of a TMDL for each listing.

National Flood Insurance Program (NFIP)

The NFIP, implemented by Congress in 1968, enables participating communities to purchase flood insurance. Flood insurance rates are set according to flood-prone status of property as indicated by FIRMs developed by FEMA. FIRMs identify the estimated limits of the 100-year floodplain for mapped watercourses, among other flood hazards. As a condition of participation in the NFIP, communities must adopt regulations for floodplain development intended to reduce flood damage for new development through such measures as flood proofing, elevation on fill, or floodplain avoidance.

State

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California’s water quality control. The California Water Code (CWC) authorizes the SWRCB to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

As discussed above, under the CWC, California is divided into nine RWQCBs, governing implementation and enforcement of the CWC and CWA. The Project site is within Region 4, also known as the Los Angeles Region (LARWQCB). Each RWQCB is required to formulate and adopt



a Basin Plan for its region. The LARWQCB's Basin Plan is a comprehensive document that reports beneficial uses for surface and ground waters, defines narrative and numeric parameters to protect water quality, and describes implementation programs to protect waters throughout the Region. The Basin Plan must adhere to the policies set forth in the CWC and established by the SWRCB. The RWQCB is also given authority to include within its regional plan water discharge prohibitions applicable to conditions, areas, or types of waste.

Low Impact Development – Sustainable Storm Water Management

On January 20, 2005, the SWRCB adopted sustainability as a core value for all activities and programs conducted by the SWRCB. Low Impact Development (LID) is a sustainable practice that promotes water retention and the protection of water quality. LID design techniques include features that increase infiltration, filtration, storing of water, reduce evaporation, and detain runoff. Ten common LID practices are:

1. Bioretention and Rain Gardens
2. Rooftop Gardens
3. Sidewalk Storage
4. Vegetated Swales, Buffers, and Strips; Tree Preservation
5. Roof Leader Disconnection
6. Rain Barrels and Cisterns
7. Permeable Pavers
8. Soil Amendments
9. Impervious Surface Reduction and Disconnection
10. Pollution Prevention and Good Housekeeping

California Toxics Rule

In 2000, the U.S. EPA promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the state. In 1994, a California state court revoked the state's water quality control plans, which contained numeric criteria for water quality. This was in direct violation of the CWA and required EPA action. The EPA then implemented the California Toxics Rule. The EPA promulgated this rule based on Clean Water Act Section 303(c)(2)(B), which dictates that states must adopt numeric criteria in order to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

Sustainable Groundwater Management Act

In 2014, California adopted the SGMA to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agencies (GSAs) be formed for all high and medium priority basins in the state. These GSAs must develop and implement Groundwater Sustainability Plans (GSPs) for managing and using groundwater without causing undesirable results: significant



groundwater-level declines, groundwater-storage reductions, seawater intrusion, water-quality degradation, land subsidence, and surface-water depletions; these are also referred to as sustainability indicators.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, which would be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is within a “low priority” California Statewide Groundwater Elevation Monitoring groundwater basin that is also part of an adjudicated groundwater. Basins prioritized as low- or very low priority are not required to form a GSA and prepare a GSP. However, these basins are still encouraged to form GSAs and develop GSPs, update existing groundwater management plans, and coordinate with others to develop a new groundwater management plan in accordance with Water Code §10750 et seq.

Senate Bill x7-7 - Water Conservation Bill of 2009

The Water Conservation Bill of 2009 (SBX7-7) requires a statewide 20 percent reduction in urban per capita water use by December 31, 2020. It requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified requirements and requires agricultural water suppliers to prepare plans and implement efficient water management practices.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) preserves, enhances, and restores the quality of California’s water resources. Wastewater generators must obtain a permit to discharge their wastewater. Pursuant to the federal CWA and California’s Porter-Cologne Water Quality Control Act, the SWRCB and LRWQCB regulates wastewater discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. Some wastewater discharges are exempt from federal NPDES requirements, but California law may still apply. Under California law, the SWRCB and LRWQCB require waste discharge requirements for some discharges, in addition to those subject to NPDES permits. Permits contain specific requirements that limit the pollutants in discharges. They also require dischargers to monitor their wastewater to ensure that it meets all requirements. Wastewater dischargers must maintain their treatment facilities, and treatment plant operators must be certified. The SWRCB and LRWQCB routinely inspect treatment facilities and strictly enforce permit requirements.

Regional

County Waste Discharge Requirements



The LACFCD, the County of Los Angeles, and the City along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements (WDRs) contained in Order No. R4-2012-0175 (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*, which was adopted November 8, 2012. The MS4 Permit Order provides the revised WDRs for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

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 Los Angeles County’s LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 square feet (SF) or greater impervious surface area.

County of Los Angeles Hydrology Manual

The Project site is within a watershed that the County classifies as the Dominguez Watershed. The Los Angeles County Flood Control District (LACFCD) is responsible for providing flood protection, water conservation, recreation, and aesthetic enhancement within this entire watershed. The Los Angeles County Department of Public Works (LACDPW) developed the “Hydrology Manual” (January 2006) (“2006 Hydrology Manual”), which establishes the LACDPW hydrologic design procedures based on historic rainfall and runoff data collected within the County. The Project is required to utilize the 2006 Hydrology Manual and accompanying hydrologic tools including the HydroCalc Calculator to calculate existing and proposed Project discharges and volumes.

County of Los Angeles Department of Public Works Low Impact Development Standards Manual

The County’s Department of Public Works prepared the Low Impact Development Standards Manual (February 2014)¹³ (LID Standards Manual) to comply with NPDES MS4 Permit requirements for stormwater and non-stormwater discharges from the MS4 within the County’s coastal watershed (CAS004001, Order No. R42012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of

¹³ County of Los Angeles Department of Public Works. (2014). Low Impact Development Standards Manual. Retrieved from: [Los Angeles County Low Impact Development \(LID\) Manual.pdf \(lacounty.gov\)](https://www.lacounty.gov/department-of-public-works/low-impact-development-standards-manual), Accessed May 2023.



improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The City has adopted the County LID standards.

Local

City of Gardena General Plan

The GGP Community Resource Element provides a Conservation Plan with the following goals and policies concerning hydrology and water quality:

- **CN Goal 2:** Conserve and protect groundwater supply and water resources.
 - **Policy CN 2.2:** Comply with the water conservation measures set forth by the California Department of Water Resources.
 - **Policy CN 2.6:** Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) Chapter 8.70 - Stormwater and Runoff Pollution Control.

This section addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States.

GMC §8.70.110.B.1 - Development Construction This section specifies that “no Grading Permit would be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a General Construction Activity Stormwater Permit [Construction Stormwater General Permit] from the SWRCB.

GMC §8.70.110.B.2 - Standard Urban Stormwater Mitigation. This section specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). SUSMP conditions assigned by the City shall consist of: (a) LID BMPs; (b) source control BMPs; and (c) structural and nonstructural BMPs for specific types of uses.

City of Gardena Sewer Master Plan

The City’s Sewer Master Plan, which was adopted May 2023, provides a plan to operate and improve the City’s sewer system through 2045. The Sewer Master Plan provides guidance for collection system operations, existing pipelines and pump stations, and rehabilitation and replacement projects through implementation of the City’s capital improvement program. Additionally, the Plan identifies short- and long-term wastewater flow management measures to meet increased wastewater flows created from future development and population growth in the City. See the *Environmental Setting – Wastewater Section* above for further discussion concerning existing wastewater facilities in the Project area.



The City's Sewer Master Plan capacity analysis identifies lines which do not meet the specified performance criteria; these are depicted on Sewer Master Plan Figure ES.2: Recommended Improvements, and listed in Sewer Master Plan Table ES.3: Detailed Capital Improvement Program. None of the City gravity main pipelines near the Project site shown in Sewer Master Plan Figure ES.2 where capacity-related improvements are proposed connect with the Project site. As previously noted, the three existing sewer house laterals at the Project site connect to the LACSD Gardena Pump Trunk Sewer, but not to any City pipeline.

Sewer Master Plan Figure 2.4: Planned Developments depicts the planned developments that the Sewer Master Plan assumes will be developed by 2045 and identifies the Project site as a planned development at 16911 South Normandie Avenue.

Electric Power, Natural Gas, and Telecommunications

Federal

There are no federal regulations concerning electricity, natural gas, or telecommunications that are applicable to the Project.

State

Renewables Portfolio Standard Program

The Renewables Portfolio Standard Program requires retail sellers of electricity to increase their purchases of electricity generated by renewable sources and establishes a goal of having 20 percent of California's electricity generated by renewable sources by 2017. In 2010, the CARB extended this target for renewable energy resource use to 33 percent of total use by 2020 (CARB 2010). Subsequent legislation requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable energy resources by 2030. Increasing California's renewable supplies is anticipated to diminish the state's heavy dependence on natural gas as a fuel for electric power generation.

100 Percent Clean Energy Act

Senate Bill (SB) 100, the 100 Percent Clean Energy Act of 2018, makes it a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

California Electrical Code

The California Electrical Code is codified in Title 24, CCR, Part 3. The Electrical Code contains regulations including, but not limited to, electrical materials, electrical wiring, overcurrent protection, grounding, and installation.



Local

Gardena General Plan 2006

The GGP Community Resources Element provides a Conservation Plan with the following goals and policies for the treatment of energy resources:

- **CN Goal 4:** Conserve energy resources through the use of technology and conservation methods.
 - **Policy CN 4.1:** Encourage innovative building designs that conserve and minimize energy consumption.
 - **Policy CN 4.2:** Require compliance with Title 24 regulations to conserve energy.

Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 15.04 - General Building Provisions. This chapter adopts the California Electrical Code in its entirety.

Solid Waste

Federal

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (Title 40, Part 258 of the Code of Federal Regulations), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills

State

Assembly Bill 75

Assembly Bill (AB) 75 was passed in 1999, and the State Agency Model Integrated Waste Management Act (Chapter 764, Statutes of 1999, Strom-Martin) took effect on January 1, 2000. The State Agency Model Integrated Waste Management Act requires state agencies to develop and implement an integrated waste management plan. The Act also mandates community service districts to provide solid waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located. Additionally, the Act requires all state agencies and large state facilities to divert at least 50 percent of solid waste from landfills after 2004, and that each state agency and large facility submit an annual report to California Department of Resources Recycling and Recovery (CalRecycle) summarizing its yearly progress in implementing waste diversion programs.



Assembly Bill 939 – Integrated Waste Management Act of 1989

The State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939) to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 50 percent by 2000 and thereafter.

AB 939 requires that all counties and cities develop a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (SRRE) to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. It also requires counties to develop a Siting Element that addresses the need for landfill/transformation facilities for 15-year intervals; and it also mandates, all cities and counties to prepare and submit Annual Reports that summarize the jurisdictions' progress in reducing solid waste. Oversight of these activities was set up under the aegis of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to CalRecycle as of January 1, 2010.

Diversionary actions required by AB 939 were continued through subsequent legislation including SB 1322, which established state programs and further reinforced the state's procurement of recyclable materials. Assembly Bill 1826 further increases recycling efforts by requiring the contract or work agreement between a business and a gardening or landscaping service to require the organic waste generated by those services to comply with the requirements of this act.

Assembly Bill 1327

California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), passed on October 11, 1991, required "CalRecycle" to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the model ordinance adopted by the CalRecycle took effect and shall be enforced by the local agency. Subsection F of GMC §18.20.110: Containers/bins details the requirements for container enclosures.

Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

SB 1374 was signed into law in 2002 and requires the range of diversion rates of construction and demolition (C&D) waste material from 50 to 75 percent at the local level. CALGreen mandates locally permitted new residential and non-residential building construction, demolition and certain additions and alteration projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous C&D debris generated during the project (CALGreen §§4.408, 5.408,



301.1.1 and 301.3).¹⁴ The Gardena City Council adopted Ordinance No. 1797 to comply with state law. SB 1374 called for preparation of a model C&D diversion ordinance by March 1, 2004, and a model ordinance was adopted by CalRecycle on March 16, 2004. SB 1374 also required that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting C&D wastes.

Assembly Bill 341 – California’s 75 Percent Initiative

AB 341, which took effect on July 1, 2012, was designed to help meet California’s recycling goal of 75 percent by the year 2020. AB 341 made “...a legislative declaration that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020...” AB 431 requires a business, defined to include a commercial or public entity that generates more than four cubic yards (CY) of commercial solid waste per week or a multifamily residential dwelling of 5 DU or more to arrange for recycling services. Such business/residential development must: 1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and 2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

California Green Building Standards (CALGreen Code)

The 2019 California Green Building Standards (CALGreen) Code sets standards for new buildings and development project with the objective of minimizing the state’s carbon output (California Building Standards Commission, 2019). The 2019 CALGreen Code has new and revised provisions that require new buildings to reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Local jurisdictions also retain the administrative authority to exceed the CALGreen standards. The 2022 CALGreen Code went into effect statewide on January 1, 2023.

Local

Gardena General Plan 2006

The GGP Community Resources Element provides a Conservation Plan with the following goals and policies concerning solid waste:

- **CN Goal 3:** Reduce the amount of solid waste produced in Gardena.
 - **Policy CN 3.1:** Comply with the requirements set forth in the City’s Source Reduction and Recycling Element.

Gardena Municipal Code

¹⁴ CalRecycle.(2020). *Construction and Demolition (C&D) Diversion Informational Guide*. Retrieved from <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel> , accessed May 2023.



Gardena Municipal Code (GMC) Chapter 8–20 - Solid Waste And Recyclable Collection And Disposal. This chapter provides an overview of the City’s solid waste and recyclable collection and disposal requirements. Subsection G: Requirement for Collection of C&D Wastes of GMC §8.20.060: Solid Waste Disposal and Diversion states that “All construction and demolition waste as defined by this chapter that result from construction work shall be collected by a solid waste collection enterprise duly authorized by the city of Gardena. No C&D wastes can be carted by a nonauthorized firm or individual unless the materials carted are recyclable solid waste as defined by this chapter, and collected without fee, or sold or donated by the owner/occupant. One hundred percent of organic waste must be diverted. One hundred percent of asphalt, concrete, dirt, and rock must be diverted.”

4.15.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G: Environmental Checklist Form, includes questions concerning utilities and service systems. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project would create a significant environmental impact if it would:

Require or result in the relocation or construction of the following new or expanded facilities, the construction or relocation of which could cause significant environmental effects:

- Water facilities (see Impact 4.15-1);
- Wastewater facilities (see Impact 4.15-2);
- Stormwater facilities (see Impact 4.15-3);
- Electric power, natural gas, and telecommunications facilities (see Impact 4.15-4);
 - Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (see Impact 4.15-5);
 - Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments (see Impact 4.15-6);
 - 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 (see Impact 4.15-7);
 - Fails to comply with federal, state, and local management and reduction statutes and regulations related to solid waste (see Impact 4.15-8)



4.15.4 IMPACTS AND MITIGATION MEASURES

Impact 4.15-1:

Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction and Operations

GSWC would supply water to the Project site via the existing public GSWC 8-inch water main that runs underneath South Normandie Avenue. The Project would connect a domestic water line, a fire line, and irrigation line to the existing water main within the South Normandie Avenue ROW. The existing water main within South Normandie Avenue would not need to be upsized to accommodate the Project. The Project would be subject to all pertinent local, regional, and state-level regulations concerning any new connections, laterals, or trenching. Additionally, the Project would utilize two existing fire hydrants along the eastern property line on South Normandie Avenue. The existing fire hydrants are served by the 8.0-inch water main within the South Normandie Avenue ROW.

The Project would require construction of new onsite water facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of water facilities, which could cause significant environmental effects. Although the Project would require relocation or construction of new onsite water facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their construction would not cause significant environmental effects. Further, the environmental effects associated with construction of the proposed water facility improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.16** of this EIR. As concluded in these EIR sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed water facilities' nature and scale, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed water facilities.

Mitigation Measures

See MM GEO-1, MM CUL-1, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, MM NOI-3, MM TCR-1, MM TCR-2, and MM TCR-3.



Impact 4.15-2:

Would the Project require or result in the relocation or construction of new or expanded wastewater conveyance/wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction and Operations

The Project’s estimated wastewater generation would be approximately 86,500 gpd, or approximately 75,890 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7: Estimated Project Wastewater Generation**.

Wastewater flow originating from the Project site would discharge to the three existing sewer house laterals that connect from the Project site to LACSD’s Gardena Pump Trunk Sewer within South Normandie Avenue. From the Gardena Trunk Pump Sewer, the Project’s wastewater would be conveyed to the JWPCP for treatment; see Impact 4.15-6 below

Table 4.15-7: Estimated Project Wastewater Generation

Land Use	Dwelling Units	Average Generation Factor (gpd/DU) ¹	Total Wastewater Generation (gpd)
Apartments	68 Units – (Studio)	150	10,200
	194 Units – (1-BR)	200	38,800
	66 Units – (2-BR)	250	16,500
Townhomes	10 Units – (4-BR)	300	3,000
	35 Units – (3-BR)	300	10,500
	30 Units – (2-BR)	250	7,500
Total Project			86,500
Total Existing²			-10,610
Net Project			+75,890 (0.08 mgd)
Note:			
¹ Based on the sewer generation factors from the “Estimated Average Daily Sewage Flows for Various Occupancies” document from LA County Public Works.			
² See Table 4.15-4 .			
Source: Appendix 4.7-1, Table 4.			

The Gardena Pump Trunk Sewer has an existing total capacity of 2.2 mgd and conveyed a peak flow of 1.7 mgd (when last measured in 2017). Inclusive of the Project, the Gardena Pump Trunk Sewer would convey a peak flow of 1.78 mgd, with a remaining capacity of 0.42 mgd. As such, sufficient capacity exists in the Gardena Pump Trunk Sewer to serve the Project and County sewer lines would not need to be upsized to accommodate the Project. The Project would be subject to compliance with all pertinent local, regional, and state-level regulations concerning any new connections, laterals, or trenching. The California Health and Safety Code (HSC) empowers the LACSD 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 LACSD may require payment of a connection fee before the Project is permitted to discharge to the LACSD’s



sewerage system. It is also noted, the Project does not propose to connect to the City’s existing local sewer line within the South Normandie Avenue ROW along the Project site’s eastern frontage.

The Project would require construction of new onsite wastewater conveyance facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of wastewater conveyance facilities, which could cause significant environmental effects. Although the Project would require relocation or construction of new onsite wastewater conveyance facilities, these improvements would be limited to connections to existing LACSD facilities near the Project site, thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with construction of the proposed wastewater improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.16** of this EIR. As concluded in these EIR sections, the Project’s environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed wastewater facilities’ nature and scale, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed wastewater facilities.

As concluded in Impact 4.15-6, adequate capacity exists to serve the Project’s wastewater treatment demand in addition to the provider’s existing commitments at JWPCP. Therefore, the Project would not result in construction of wastewater treatment facilities, which could cause significant environmental effects. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

Impact 4.15-3:
Would the Project require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction and Operations

The Project proposes onsite drainage improvements by diverting existing stormwater flows and increasing the site’s permeability. The Project proposes landscaped areas throughout the site that would result in a decrease in the existing impervious surfaces from 99.7 percent to 85.9 percent. Stormwater would be captured by a series of drains and discharged directly to



ground level, where they join surface-level sheet flows and discharge to a catch basin on Brighton Way. From Brighton Way, stormwater runoff would flow to the public storm drain system. The Project was analyzed under 10-year, 25-year, and 50-year design storm peak flow and demonstrated that the Project would not impact the Capital Flood conveyance capabilities of any drainage systems.¹⁵ The Project's proposed drainage patterns are further discussed in **Section 4.7: Hydrology and Water Quality**.

The Project would require construction of new onsite stormwater facilities, as well as limited connections to existing offsite/adjacent infrastructure. Any new connections, laterals, or trenching required as a part of Project construction would be subject to compliance with Los Angeles County Department of Public Works (LACDPW) requirements, as detailed in the Los Angeles County Hydrology Manual (January 20026) and the Low Impact Development Standards Manual (February 2014)¹⁶ (LID Standards Manual). The Project would also be subject to compliance with GMC Title 8 Chapter 7: Stormwater and Runoff Pollution Control requirements. As such, the Project would result in construction of stormwater facilities, which could cause significant environmental effects. Although the Project would require relocation or construction of new stormwater facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with construction of the proposed stormwater facility improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.16** of this EIR. As concluded in these EIR sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed stormwater facilities' nature and scale, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed stormwater drainage facilities.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

Impact 4.15-4:

Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant Impact

¹⁵ Appendix 4.7-1.

¹⁶ County of Los Angeles Department of Public Works. (2014). Low Impact Development Standards Manual. Retrieved from: [Los Angeles County Low Impact Development \(LID\) Manual.pdf \(lacounty.gov\)](https://www.lacounty.gov/files/assets/2014/02/LID-Manual.pdf), Accessed May 2023.



Construction and Operations

Electric Power Facilities. Table 4.15-8: Estimated Project Electric Power Demand provides the Project’s estimated electric power demand and indicates it totals 4,017,999 kWh per year (approximately 11,008 kWh per day), or approximately 3,142,928 kWh/yr over existing conditions.

Table 4.15-8: Estimated Project Electric Power Demand

Land Use	Dwelling Units	Electricity (kWh/year) ^{1,2}
Apartment Mid Rise	328	2,092,880
Townhome Style Units	75	645,198
Enclosed Parking with Elevator		754,120
Water Energy		525,801
	Total Project	4,017,999
	Total Existing	-875,071
	Net Project	+3,142,928
Notes:		
¹ CalEEMod was used to calculate the electricity demand based on land use.		
² Kilowatt hours (kWh)		
Source: Appendix 4.3-1.		

SCE provides electric power to the Project site and operates and maintains transmission and distribution infrastructure in the Project area. Although the Project’s estimated electricity demand would increase by approximately 3,142,928 kWh/yr over existing conditions, this demand comprises less than 0.005 percent of the typical annual electricity usage in the County and SCE has confirmed they have sufficient capacity to accommodate the Project.¹⁷

The Project would require construction of new onsite electric power facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of electric power facilities, which could cause significant environmental effects.

Natural Gas Facilities. The Project site is currently served by natural gas and there is existing infrastructure owned and maintained by SoCalGas. However, pursuant to the 2022 Energy Code, the Project would be all-electric and would not include connections to natural gas supply. Project construction would also not use natural gas. As such, the Project would not construct natural gas facilities or cause environmental effects in this regard.

Telecommunication Facilities. Various companies provide telecommunications including AT&T, Direct TV, Dish Network, Time Warner Cable, Verizon, and ViaSat. The Project proposes to connect to the existing telecommunication infrastructure at the Project site. The Project would require construction of new onsite telecommunication facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of telecommunication facilities, which could cause significant environmental effects.

¹⁷ Appendix 4.3-1.



Conclusion. Although the Project would require relocation or construction of new electric power and telecommunication facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with construction of the proposed electric power and telecommunication facility improvements are discussed as part of the overall environmental analyses in **Section 4.1** through **Section 4.16** of this EIR. As concluded in these EIR sections, the Project’s environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the nature and scale of the proposed electric power and telecommunication facilities, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed electric power and telecommunication facilities.

Concerning natural gas, the Project would not require relocation or construction of new or expanded natural gas facilities. Therefore, the Project would not cause significant environmental effects from construction of natural gas facilities. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

<p>Impact 4.15-5:</p> <p>Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?</p> <p><i>Level of Significance: Less Than Significant Impact</i></p>
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Construction and Operations

The Project’s estimated water demand would total approximately 158,211 gpd, or approximately 145,479 gpd over existing conditions; see **Table 4.15-9: Estimated Project Water Demand**. The Project would include all state-mandated water-saving features, including water-efficient faucets, shower heads, and toilets.



Table 4.15-9: Estimated Project Water Demand

Land Use	Units	Average Demand Factor (gpd/DU) ¹	Total Water Demand (gpd)
Apartments	68 Units – (Studio)	180	12,240
	194 Units – (1-BR)	240	46,560
	66 Units – (2-BR)	300	19,800
Townhomes	10 Units – (4-BR)	360	3,600
	35 Units – (3-BR)	360	12,600
	30 Units – (2-BR)	300	9,000
Pool(s) ²	1 Unit @ - L1 Courtyard	13,614	13,614
	1 Units @ - L1 Courtyard	2,693	2,693
	1 Unit @ - L3 Courtyard	35,904	35,904
Landscaping	30,891 SF	ETWU Method ^{3,4}	2,200
Total Project			158,211 (177.2 AFY)
Total Existing⁵			-12,732
Net Project			+145,479 (+163 AFY)
Note: ¹ Based on 120% of the sewer generation factors from the “Estimated Average Daily Sewage Flows for Various Occupancies” document from LA County Public Works. See Golden State Water Company 2020 Urban Water Management Plan Southwest Service Area, page 1-2. ² Pools vary in size: therefore, pools have different water consumption values per unit. ³ Demand based on Estimated Total Water Use equation: (Eto*plant factor*landscaped area* 0.62)/irrigation efficiency. Utilizing CIMIS Reference Evapotranspiration Zones Map ET of 46.6 in/yr, and a conservative plant factor of 0.7 and irrigation efficiency of 0.81 proposed condition. ⁴ The Project’s proposed landscaping was updated to total 30,205 SF (See Section 3.0: Project Description) after completion of this analysis. Because the Project’s updated landscaping would generate less water demand, this analysis conservatively assumes 30,891 SF of proposed landscaping for purposes of determining water demand. ⁵ See Table 4.15-1 .			
Source: Appendix 4.15 , Table 3.			

UWMP water demand forecasts are based on adopted general plans. The General Plan’s assumed existing land use for the Project site is “Industrial,” with an estimated maximum development capacity of approximately 228,690 SF; see **Table 4.8-2: Existing General Plan Land Use Designations**. Therefore, the UWMP assumed industrial uses for the Project site. Because the Project proposes a General Plan Amendment to change the Project site’s land use designation from Industrial to Specific Plan, and the Project’s estimated water demand would exceed the UWMP’s assumed water demand for the Project site, the Project’s water demand was not accounted for in the UWMP. However, GSWC analyzed the Project to determine if sufficient water supplies would be available to serve the Project from existing entitlements and resources. GSWC confirmed water service would be available to serve the Project from GSWC’s Southwest System.¹⁸ The UWMP projects that the service area’s water demands will increase from 37,318 AFY in 2025 to 39,840 AFY in 2045 for both normal and dry years representing an increase in demand of 2,522 AFY. The Project’s increase in water demand of 145,479 gpd (163 AFY) represents approximately 6.5% of the UWMP’s forecast increase in demand between 2025 and

¹⁸ Zhao, Joseph, Golden State Water Company, personal communication, December 7, 2021.



2045. GSWC provides conservation programs along with incentives to conserve water in the City. Although the GSWC service area population is expected to increase, the overall baseline potable demand in AFY is expected to decrease due to further water use efficiency and recycled water programs. The UWMP also projects adequate supplies to meet all future demands.¹⁹ The GSWC's UWMP indicates water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2045; see **Table 4.15-2**.

Therefore, GSWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation required.

<p>Impact 4.15-6:</p> <p>Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?</p> <p><i>Level of Significance: Less Than Significant Impact</i></p>
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Construction and Operations

As discussed above, the Project's estimated wastewater generation would be approximately 86,500 gpd, or approximately 75,890 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7**. The Project's wastewater flow would be conveyed to the JWPCP for treatment. The JWPCP currently processes an average wastewater flow of 243.1 mgd and has a total permitted capacity of 400 mgd. JWPCP's capacity is based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG).

The Project's estimated wastewater generation of 75,890 gpd (0.076 mgd) comprises less than 0.06 percent of JWPCP's remaining available capacity of 156.9 mgd. As such, sufficient capacity exists at JWPCP to serve the Project and no JWPCP expansion/modification would be required to accommodate the Project. Therefore, the JWPCP has adequate capacity to serve the Project's estimated wastewater treatment demand in addition to the provider's existing commitments. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation required.

¹⁹ Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*.



Impact 4.15-7: Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact 4.15-8: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Level of Significance: Less Than significant Impact

The Project proposes to remove all existing onsite structures and surface parking lot and construct/operate a 403 DU (i.e., 328 DU apartment building and 75 townhome) multi-family residential development. State law requires a 65 percent diversion rate for Construction and Demolition (C&D) projects. The Gardena City Council adopted Ordinance No. 1797 to comply with state law. Each C&D project for which a Building/Demolition Permit is applied for and approved must achieve the waste diversion performance standard or show a good faith effort to achieve that standard. Thus, the Project would be subject to compliance with Ordinance No. 1797, which would achieve compliance with state law.

Waste Resources of Gardena would provide the Project's solid waste pickup services. The trash pickup locations would be coordinated with Waste Resources. CalRecycle provides multi-family residential solid waste generation rates from various sources (i.e., five sources), which range from 3.6 pounds per DU per day (lbs/DU/day) to 8.6 lbs/DU/day, and average 5.1 lbs/DU/day.²⁰ Based on 403 DU and 5.1 lbs/DU/day, the Project would generate approximately 2,056 lbs/day (approximately 1.03 tons per day). Project implementation would increase solid waste disposal demands over existing conditions. As previously noted, Chiquita's maximum permitted throughput is 12,000 tons per day.²³ The Project's estimated solid waste generation of approximately 1.03 tons per day comprises less than one-tenth percent of Chiquita's maximum permitted daily throughput. Chiquita's remaining and maximum capacities are approximately 60.4 million cubic yards and approximately 110.4 million cubic yards, respectively. The Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Project's solid waste disposal needs. Therefore, Chiquita could accommodate the Project's solid waste disposal needs. Operational activities would be subject to compliance with all applicable federal, state, and local statutes and regulations for solid waste, including those identified under CALGreen and AB 939.

The Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

²⁰ California Department of Resources Recycling and Recovery. (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>, accessed May 2023.



Mitigation Measures

No mitigation required.

4.15.5 CUMULATIVE IMPACTS

The context for assessing cumulative environmental impacts associated with utilities is the service area associated with each of the utility and service system (i.e., water, wastewater, wastewater treatment, electric power, telecommunications, and solid waste) service providers to the Project. The cumulative analysis regarding electric power and natural gas demands is included in **Section 4.3: Energy**. The cumulative impacts analysis evaluates whether the provision of utilities and service systems for the growth projected to occur in the future, along with the proposed Project, would exceed the capacity of existing or planned utility infrastructure, requiring the construction of new infrastructure that could cause significant environmental impacts not already addressed as part of the Project or otherwise anticipated in conjunction with each agency's growth plans.

Water

The geographic context for the cumulative analysis of water is the GSWC Southwest service area. The Project would result in an increased demand for water supplies. There would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Also, the Project would require relocation/construction of new water facilities, but these would not cause significant environmental effects. Related projects also could result in water supply impacts, and incrementally increase the long-term demand for water supply, similar to the Project. Further, all cumulative projects would be required to assess whether adequate water infrastructure and supply exist to serve their demand, and whether additional or expanded water infrastructure would be required. All projects would be required to construct water infrastructure improvements in order to adequately serve the projects, if necessary. Individual assessments of water services would be prepared, and mitigation would be provided if necessary to reduce a potential impact. Further, SB 610 requires a Water Supply Assessment (WSA) for all cumulative projects that are both subject to CEQA and considered a project under the California Water Code §10912.²¹ Any relocated/new water facilities for cumulative projects would undergo separate environmental review to determine if they would cause environmental effects, and require compliance with all applicable County and City water supply ordinances, laws, and regulations. Each applicant also must fund the cost of the water-related infrastructure needed to serve the particular site. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning water. Therefore, the Project would not cause a cumulatively considerable impact concerning water supply and facilities.

²¹ A project under the California Water Code §10912 means any of the following: (1) A proposed residential development of more than 500 dwelling units. (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.



Wastewater

The geographic context for the cumulative analysis of wastewater is the LACSD service area, as except three existing sewer house laterals, the Project would not connect to City sewer facilities. The proposed Project could be adequately served by existing LACSD facilities. The Project would require relocation/construction of new wastewater facilities, but these would not cause significant environmental effects.

Other cumulative projects within the LACSD's service area could result in increased wastewater generation and demand for wastewater treatment services. There are seven related projects (i.e., Related Project Nos. 2, 3, 4, 12, 15, 16, and 22) within one mile of the proposed Project. There is the potential for these seven project to also connect to the Gardena Pump Trunk Sewer in South Normandie Avenue. However, inclusive of the proposed Project, the trunk sewer has a remaining capacity of 0.42 mgd. Additionally, the JWPCP plant currently operates below its design capacities and has a remaining capacity of approximately 157 mgd. Thus, cumulative development would not exceed JWPCP's capacity. To further ensure development would not exceed the capacity of the wastewater treatment system, all cumulative development projects would be required to obtain a Will Serve Letter from LACSD, or equivalent, to ensure there is available trunk sewer and treatment plant capacities for the proposed development project. LACSD has confirmed the Project could be adequately served by existing facilities; see **Appendix 4.15-1**. All relocated/new sewer facilities proposed or necessitated by cumulative projects would be subject to applicable CEQA review to determine if they would cause environmental effects, and all projects would be required to comply with the other applicable laws and regulations protecting environmental resources. Adherence to the regulatory framework would ensure that cumulative projects would result in demand for wastewater treatment services that exceed the existing entitlements and resources for wastewater services. Therefore, when combined with cumulative development, the Project's potential impacts from relocation or construction of new or expanded wastewater facilities would not be cumulatively considerable.

Stormwater Drainage

See **Section 4.7: Hydrology** for cumulative impacts to stormwater drainage facilities.

Electric Power, Natural Gas, and Telecommunications

The geographic context for the cumulative analysis of electric power, natural gas, and telecommunications is the service area of the various service providers. The proposed Project would not use natural gas nor construct natural gas facilities and thus, would not cause an environmental effect in this regard. Although the Project would require relocation or construction of new electric power and telecommunications facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their relocation/construction would not cause significant environmental effects.

Because the Project would not cause significant environmental effects from construction of natural gas facilities, no cumulative impact would occur in this regard. The Project and cumulative



projects would result in an increase in the construction of additional electric and telecommunications equipment, all of which are readily available. The equipment would be installed on each related site. Similar to the Project, the cumulative projects would be required to coordinate their respective projects, sites, and requirements with the service provider to ensure that connectivity is not disturbed and that proper conduits are installed relative to their respective projects. All new electric power and telecommunication facilities proposed or necessitated by cumulative projects would undergo separate environmental review to determine if their construction or relocation would cause significant environmental effects. Therefore, when combined with cumulative development, the Project's potential impacts concerning electric power and telecommunication facilities would not be cumulatively considerable.

Solid Waste

The geographic context for the cumulative analysis of solid waste is County of Los Angeles and Chiquita Canyon Landfill service area. The Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The projections of future landfill capacity based on the entire projected waste stream going into these landfills is used for cumulative impact analysis. The 2,056 lbs, or 1.03 tons, of solid waste per day generated by the Project is less than one-tenth percent of the daily capacity of the landfills. Due to this small percentage, the increase in solid waste from the proposed Project would be less than cumulatively considerable and would be less than significant.

4.15.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning utilities and service systems have been identified.

4.15.7 REFERENCES

California Department of Resources Recycling and Recovery (CalRecycle). (2019). *SWIS Facility/Site Activity Details – Chiquita Canyon Sanitary Landfill*. Retrieved from: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037>, accessed May 2023.

California Department of Resources Recycling and Recovery. (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>, accessed May 2023.

California Department of Water Resources. (2020). *Basin Prioritization Dashboard*. Retrieved from <https://gis.water.ca.gov/app/bp-dashboard/final/>, accessed May 2023.

CalRecycle. (2020). *Construction and Demolition (C&D) Diversion Informational Guide*. Retrieved from <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel>, accessed May 2023.



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- Huffman, Mandy, *Los Angeles County Sanitation District*, personal communication, June 7, 2023.
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- Fusco Engineering. (April 2023). *Water Resources Technical Report: Normandie Crossing Specific Plan Project at 16911 S Normandie Ave, Gardena, California 90247*. See **Appendix 4.7-1: Water Resources Technical Report**.
- Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*.
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- State Water Resources Control Board. (2020). *Sustainable Groundwater Management Act Development*. Retrieved from https://www.waterboards.ca.gov/water_issues/programs/sgma/development.html, accessed May 2023.
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4.16

AESTHETICS





4.16 AESTHETICS

The purpose of this section is to examine the aesthetic and other visual resources present on the Project site and its surroundings and evaluate whether the Project would adversely impact such resources. Aesthetic and other visual resources include both natural and built-up environments.

Information in this section is based primarily on information obtained from available public resources, including the Gardena General Plan 2006 (GGP) and the Normandie Crossing Specific Plan (NCSP).

4.16.1 VISUAL RESOURCES TERMINOLOGY AND CONCEPTS

When viewing the same landscape, people may have different responses to that landscape and any proposed visual changes, based upon their values, familiarity, concern, or expectations for that landscape and its scenic quality. Because each person's attachment to and value for a landscape is unique, visual changes to that landscape inherently affect viewers differently. However, generalizations can be made about viewer sensitivity to scenic quality and visual changes. Recreational users (e.g., hikers, equestrians, tourists, and people driving for pleasure) are expected to have high concern for scenery and landscape character. People commuting daily through the same landscape generally have a moderate concern for scenery, while people working at industrial sites generally have a lower concern for scenic quality or changes to existing landscape character. The visual sensitivity of a landscape is affected by the viewing distances at which it is seen, such as close-up or far away. The visual sensitivity of a landscape is also affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence).

The same project feature can be perceived differently by people depending on the distance between the observer and the viewed object. When a viewer is closer to a viewed object in the landscape, greater detail is visible, and there is greater potential influence of the object on visual quality because of its form or scale (relative size of the object in relation to the viewer). When the same object is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middle ground, some detail is evident (e.g., the foreground), and landscape elements are seen in context with landforms and vegetation patterns (e.g., the background).

The following terms and concepts are used in the discussion below to describe and assess the aesthetic setting and Project impacts.

Scenic Vista. An area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, state, or local agency. Scenic vistas usually provide expansive, elevated views.



Scenic Highway. Any stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency.

Sensitive Receptors. Viewer responses to visual settings are inferred from a variety of factors, including distance and viewing angle, types of viewers, number of viewers, duration of view, and viewer activities. The viewer type and associated viewer sensitivity are distinguished among project viewers in recreational, residential, commercial, military, and industrial areas. Viewer activities can range from a circumstance that encourages a viewer to observe the surroundings more closely (such as recreational activities) to one that discourages close observation (such as commuting in heavy traffic). Viewers in recreational areas are considered to have high sensitivity to visual resources. Residential viewers generally have moderate sensitivity but extended viewing periods. Viewers in commercial, military, and industrial areas are considered to have low sensitivity.

Viewshed. A project's viewshed is defined as the surrounding geographic area from which the Project is likely to be seen, based on topography, atmospheric conditions, land use patterns, and roadway orientations. "Project viewshed" is used to describe the area surrounding a project site where a person standing on the ground or driving a vehicle can view the Project site.

Visual character typically consists of the landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds. Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics.

Lighting effects are associated with the use of artificial light during the evening and nighttime hours. There are two primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, architectural building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Light introduction can be a nuisance. Uses such as residences and hotels are considered light sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation as observed by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior facades largely or entirely comprised of highly reflective glass. Glare can



also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

4.16.2 EXISTING SETTING

Regional Setting

Natural Setting

The City of Gardena is landlocked and located in a relatively flat area of the greater southwest Los Angeles area, with the Santa Monica Mountains located approximately 15 miles to the north, the San Gabriel Mountains located approximately 25 miles to the northeast, the Palos Verdes Peninsula located approximately 7 miles to the southwest¹, and the Pacific Ocean about five miles to the west. Because of this dense urban environment, there are no identifiable scenic vistas within the City, except those that may be afforded by parkland/open space within the City including Rowley Park – the largest City park– and the natural Willows Wetland, a protected natural habitat that occupies eight acres in the City’s southeast portion.² The City is bordered by existing development in the cities of Hawthorne, Torrance, and Los Angeles, and unincorporated Los Angeles County.

Scenic Vistas

Appendix A: NOP and Initial Study of the Gardena General Plan’s (GGP) Final EIR (FEIR) states that the City is not located within an area known to be a “scenic vista.”³

Scenic Highway

GGP’s FEIR Appendix A states that the City is not located along a City, County, or State designated scenic highway or corridor. It also adds that “As stated in the existing Circulation and Scenic Highway Element, due to the physical features of the local streets, highways, and surrounding cityscapes and landscapes, no potential exists within the foreseeable future for satisfying the criteria necessary for scenic highways.”⁴

¹ City of Gardena. (2005). *Final Environmental Impact Report City of Gardena General Plan 2006*. Appendix A: NOP and Initial Study. Retrieved from <https://www.cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf>.

² City of Gardena. (2006). *Gardena General Plan 2006: Community Resources Element, Open Space Plan, updated 2022*. Page OS-2. Retrieved from <https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan6.pdf>.

³ City of Gardena. (2005). *Final Environmental Impact Report City of Gardena General Plan 2006*. Appendix A: NOP and Initial Study. Retrieved from <https://www.cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf>.

⁴ Ibid.



Visual Character

The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bordered by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west. The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal pervious areas. The existing industrial buildings are blighted, and the property is inadequately maintained and devoid of landscaping. The Project site is framed by contorted slatted, barbed wire fencing that is in disrepair on all sides, except for the site's northeastern portion. Additionally, a portion of one of the six industrial buildings is in a dilapidated condition and is not unoccupiable or currently being used.

The greater Project area is fully developed, and generally bordered by single- and multi-family residential uses (see **Table 2-3: Surrounding Land Uses and Zoning**). A three-story multi-family structure is located north of West 169th Street. A UPRR track borders the Project site to the east. East of South Normandie Avenue there are one- and two-story single-family residences and two- and three-story condominiums. One-story single-family residences are located along West 170th Street to the south and Brighton Way to the east. Limited ornamental trees are provided on the east side of South Normandie Avenue and adjacent to the Project site on West 170th Street and West 169th Street. There are no landforms, open space, landscaped corridors, or viewsheds within the Project area.

Light and Glare

The Project site and surrounding area is primarily built out and is typical of that found in urban environments. Ambient light from urban uses in the area includes building lighting (exterior and interior), streetlights, parking lot lights, and night lighting for recreational uses. Another source of nighttime light is vehicle headlights along surrounding roadways.

The Project site is adjacent sensitive use on all sides. The distance from the Project site's northern property line to the nearest adjacent sensitive use is 76 feet. The distance from the Project site's southern property line to the nearest sensitive use line is 50 feet. The distance from the Project site's eastern property line to the nearest sensitive use property line is 80 feet. Excluding the abutting single-family residential structure, the distance from the Project site's western property line to the nearest sensitive use property line is 25 feet.

As discussed above, existing uses still occur on the site. Glare from daytime operations from mobile sources (cars and trucks) and nighttime sources such as security lights, streetlights, and mobile sources occur on a normal basis. In addition, there are two onsite billboards by the site entrance on South Normandie Avenue; however, based on desktop research, both are unlighted and therefore, do not contribute to any substantial light or glare at night.



4.16.3 REGULATORY SETTING

State

California Department of Transportation

The California Department of Transportation (Caltrans) manages the Scenic Highway Program, which is intended to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. State laws governing the Scenic Highway Program are found in Streets and Highways Code §§260 to 263. A highway may be designated as scenic based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic quality, and the extent to which development intrudes on the traveler's scenic view enjoyment. The Program's *Scenic Highway System List* identifies scenic highways that are either eligible for designation or have already been designated as such. As previously stated, there are no State designated scenic highways within the Project site vicinity.

California Code of Regulations, Title 24

California Code of Regulations (CCR) Title 24, also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following Title 24 components include standards related to sign lighting:

The California Green Building Standards Code, which is Part 11 of Title 24, is commonly referred to as the CALGreen Code. Paragraph A4.106.10, Light Pollution Reduction, recommends that residential outdoor lighting comply with the following:

- The minimum requirements in the California Energy Code for Lighting Zones 1-4, as defined in California Administrative Code Chapter 10, as noted above;
- Backlight, Uplight and Glare (BUG) ratings defined in IES TM-15-11;
- Allowable BUG ratings not exceeding those shown in Table A4.106.10; and
- A local ordinance lawfully enacted pursuant to § 101.7, whichever is more stringent.

Lighting Zone Designation LZ3

The Project site and surrounding properties are urban, mixed use, commercial, and residential zones with nighttime uses. Current best practices for lighting standards recognize the unique issues related to nighttime use adjacent to residences. The CEC includes designations for LZ 1 through 4 which correspond to the IESNA 10th Edition Handbook, Table 26.4 Light Trespass recommendations.



All California urban areas are designated LZ 3, as default under the CEC, which limits the Light Trespass to 8 lux (0.74 footcandles). Per the CEC, California Building Energy Efficiency Standards, § 10-114, pages 40, 41, the designations for outdoor lighting zones in urban areas are as follows:

“The default for urban areas, as defined by the U.S. Census Bureau, is Lighting Zone 3. Local AHJs (Authorities Having Jurisdiction) may designate areas to Lighting Zone 4 for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels.”

The existing conditions at and surrounding the Project site and along South Normandie Avenue, West 169th Street, Brighton Way, and 170th Street are consistent with the definition of LZ 3 noted above. In addition, the IESNA defines LZ 3 as:

“areas of human activity where the vision of human residents and users is adapted to high light levels. Lighting is generally considered necessary for safety, security and/or convenience and it is mostly uniform or continuous.”

IESNA Table 26.5, lists a Pre-curfew 8 Lux (0.74 footcandles) maximum at the location where trespass is under review for LZ 3. The CEC standard is well defined and supported by the IESNA and ASHRAE, and other independent lighting organizations such as the International Dark Sky Organization and U.S. Green Building Council.

Local

City of Gardena General Plan

The GGP Community Development Element provides a Community Design Plan that focuses on the aesthetic qualities of existing and future developments in the City and its relationship to the surrounding environment. The following goals and policies are relevant to aesthetic resources:

- **DS Goal 1:** Enhance the visual environment and create a positive image of the City.
 - **Policy DS 1.3:** Promote a stronger design review process to ensure that public and private projects comply with best design practices and standards.
 - **Policy DS 1.4:** Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gate-way locations.
 - **Policy DS 1.8:** Encourage neighborhood district identity.
- **DS Goal 2:** Enhance the aesthetic quality of the residential neighborhoods in the City.
 - **Policy DS 2.1:** Provide stronger design guidelines for residential development, including both new construction and additions to existing single-family units or multi-family dwellings.



- **Policy DS 2.2:** Ensure that new and remodeled dwelling units are designed with architectural styles, which are varied and are compatible in scale and character with existing buildings and the natural surroundings.
- **Policy DS 2.3:** Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.
- **Policy DS 2.7:** Require appropriate setbacks, massing, articulation and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing.
- **Policy DS 2.8:** Ensure that new single-family residential buildings or additions are designed and constructed with sensitivity for the privacy of adjacent residential properties and the value and quality of existing homes.
- **Policy DS 2.9:** Integrate new residential developments with the surrounding built environment. In addition, encourage a strong relationship between the building and the street.
- **Policy DS 2.10:** Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a “greener” environment for residents and those viewing from public areas.
- **Policy DS 2.11:** Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy.
- **Policy DS 2.12:** Provide well-designed and safe parking areas that maximize security, surveillance and efficient access to building entrances.
- **Policy DS 2.13:** Encourage lot consolidation for multi-family development projects in order to produce larger sites with greater project amenities.
- **Policy DS 2.14:** Require design standards to be established to provide for attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.
- **Policy DS 2.15:** Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.

City of Gardena Municipal Code

The Project is subject to compliance with **Gardena Municipal Code (GMC) Chapter 18.39 – Specific Plans**. Per Subsection B of §18.39.010: Intent and Authority, the regulations established in a specific plan zone would allow residential, commercial, or industrial land uses and development standards created specifically for the Project area, while ensuring compliance with



the spirit, intent, and provisions of GMC Titles 17 and 18, the Gardena General Plan, and other applicable laws. Guidelines, regulations and development standards incorporated in any specific plan zone are intended to achieve the following:

1. Respond sensitively to the natural and built environment and increase amenities to serve the inhabitants and surrounding community and neighborhood area;
2. Minimize the alterations of existing landforms and preserve significant natural features and vegetation unique to the city;
3. Conserve the historic, cultural and scenic assets of the city;
4. Provide an enriched environment with aesthetic cohesiveness and harmonious massing of structures within a framework of natural and landscaped open space through the utilization of superior land planning and architectural design;
5. Minimize the intrusion of new development into environmentally sensitive areas;
6. Protect new development from adverse visual impacts and excessive noise from nearby off-site structures and transportation corridors.

The GMC regulates lighting with respect to light trespass (i.e., the spillover of light onto adjacent light-sensitive properties). The City also enforces the building code requirements of the California Building Code, the California Green Building Standards Code (CALGreen), and the California Electrical Code, as adopted by the City.

4.16.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning aesthetics. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Have a substantial adverse effect on a scenic vista (see **Section 7.0: Effects Found Not to be Significant**);
- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway (see **Section 7.0: Effects Found Not to be Significant**)
- If the Project is in an urbanized area, impacts may be significant if the Project conflicts with applicable zoning and other regulations governing scenic quality (see Impact 4.16-1); and/or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (see Impact 4.16-2)



Methodology and Assumptions

The Project and proposed Specific Plan Design Guidelines are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning aesthetics. In addition to the design characteristics of future development, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

This analysis of impacts on aesthetic resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application, outlined above. For each criterion, the analyses address both temporary (construction) and operational impacts, as applicable. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The existing conditions and impact analyses are based on a desktop review⁵ including review of Project maps and drawings; Specific Plan design guidelines and development standards, analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that a Project component would or would not result in "substantial" adverse effects on scenic resources or visual character considers the site's aesthetic resource value and the Project's individual component visual impact (e.g., the nature and duration of the impact). In other words, new conspicuous structures or visual changes in areas with a low aesthetic resource value may not necessarily result in substantial adverse effects on visual resources.

Visual sensitivity can be described as viewer awareness of visual changes in the environment and is based on the viewers' perspective while engaging in activities from public areas near a project site. The Project site is visible to various users, primarily from local roadways and businesses. The sensitivity of those users to changes within a project site varies with the type of use, length of time that the viewer would be within a project site's zone of visual influence (ZVI), and the viewer's distance from a project site. Viewers of a project site typically include nearby residents, and recreational users, travelers, and commuters within a project's ZVI.

⁵ A "desktop review" is a limited-scope evaluation that does not include a site inspection visit.



4.16.5 IMPACTS AND MITIGATION MEASURES

Impact 4.16-1:

If an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Level of Significance: Less Than Significant Impact

Discussion/Analysis

The Project site is in an urbanized area. The Project site is in the City's southeast portion and is bordered by roadways, a railroad spur, and single- and multi-family residential uses. The Project site is fully developed with six industrial buildings constructed and remodeled between 1952 and 1979. The existing industrial buildings are blighted and a portion of one of the six industrial buildings is in a dilapidated condition and is not unoccupiable or currently being used. The property is inadequately maintained, devoid of landscaping, and is framed by contorted slatted, barbed wire fencing that is in disrepair on all sides, except the site's northeastern portion. The onsite UPRR spur is no longer in use. The Project proposes to remove all existing on-site improvements and construct a 7-story apartment building with 403 multi-family dwelling units: 328 units and 75 townhomes. The apartment building's maximum height would be 90 feet as measured from the finished floor (i.e., the level of the finished floor on the ground level) of the roof's highest point, including non-habitable projections (including without limitation, architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures). The townhomes would be three-stories at a maximum height of 40 feet as measured from the finished floor of the roof's highest point, including non-habitable projections.

The existing zoning for the Project site is identified in **Table 4.8-3: Existing Zoning** in **Section 4.8: Land Use and Planning**. The regulations specified in **Table 4.8-3** do not include standards governing scenic quality. While the GMC does not include regulations specifically regarding scenic quality, the City does have a standard for urban design for residential uses set forth in GMC §18.42.120.

Of the 5.25-acre site, approximately 1.32 acres (Parcels 1, 2, and 3) are zoned General Industrial Zone (M-1) and 3.93 acres (Parcel 4) are zoned General Industrial Zone (M-2). Parcels 1, 2, and 3 have a Housing Overlay 4 (HO-4), which allows a density of 21-30 dwelling unit per acre (DU/AC).

Project implementation requires the following zone changes:

- A zoning map amendment to change the zones from (1) Industrial (M-1) with a High Density 30 Overlay and (2) General Industrial (M-2) to Normandie Crossing Specific Plan Zone;
- At 16964 West 179th Street, rezone from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone;



- Concerning the Union Pacific Railroad parcel immediately adjacent and east of the Project site, rezone from General Industrial (M-2) to Official (O); and
- A GMC zoning text amendment to add Normandie Crossing Specific Plan.

NCSP Chapter 6: Design Guidelines includes architecture, landscape, and streetscape design standards per GMC §18.39.010(b), which would govern Project development and promote aesthetic quality. Therefore, the Project would not conflict with applicable zoning governing scenic quality.

Further, as determined in **Table 4.8-4: Gardena General Plan 2006 Analysis**, the Project would not conflict with Policy LU 1.1, Policy LU 1.2, Policy LU 1.5, Policy DS 1.4, Policy DS 2.1, Policy DS 2.2, Policy DS 2.3, Policy DS 2.7, Policy DS 2.9, Policy DS 2.10, Policy DS 2.11, Policy DS 2.12, Policy DS 2.14, and Policy DS 2.15, all of which govern scenic quality. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

<p>Impact 4.16-2: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</p> <p><i>Level of Significance: Less Than Significant Impact</i></p>

Discussion/Analysis

The seven-story buildings would be visible from surrounding areas that also create lighting. The proposed Project would create lighting from two primary sources: lighting from building interiors that would pass through windows and lighting from exterior sources (e.g., street lighting associated with offsite improvements, parking lot lighting, building illumination, security lighting, and landscape lighting). Future development within the NCSP area would be subject to the light and glare regulations specified in GMC §18.42.150: Security and Lighting Plan, which the City requires to ensure that safety and security issues are addressed in the development’s design, and that an average of one footcandle is provided for all the public/common areas. NCSP Section 6.3: Lighting Standards requires that open spaces and pedestrian areas be illuminated. The Project’s outdoor lighting would be subject to compliance with GMC §18.42.150.

The City would also review new lighting for conformance with the California Green Building Standards (CALGreen) (2022 Standards) (CCR Title 24 Part 11) in effect at the time that building plans are submitted, such that only the minimum amount of lighting is used, and no light spillage occurs. Additionally, NCSP Section 6.3 requires that light fixtures be designed and located in a manner that does not allow spillover onto adjacent properties. Consistent with City



requirements, required landscaping may also help buffer and minimize light effects on adjacent land uses.

With respect to materials used for the construction of the apartment and townhome buildings, reflective or shiny materials would not be used. The materials that would be used for Project construction would not create any significant light or glare within the Project area.

Because the Project site and surrounding area are developed, the Project's proposed lighting would not substantially increase light and glare within the site or its surroundings. With adherence to GMC standards, the NCSP, and California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings, the Project's lighting and glare impacts would be less than significant and potential light spill would not occur on surrounding land uses or roadways. Light and glare impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.16.6 CUMULATIVE IMPACTS

When evaluating cumulative aesthetic impacts, several factors must be considered. The cumulative study area for aesthetic impacts is the viewshed that includes the Project area and its surrounding areas. The context in which a project is being viewed would also influence the significance of the aesthetic impact. The contrast a project has with its surrounding environment may be reduced by the presence of other cumulative projects. If most of an area is or is becoming more urbanized, the contrast of a project with the natural surrounding may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the proposed elements of the cumulative projects would need to be seen together or in proximity to each other. If the projects were not near each other, the viewer would not perceive them in the same scene.

Ongoing development within the Project area would alter the area's existing character and quality. Future development projects would have the potential to increase the amount of light and glare. Each development in the Project area would be required to comply with policies and regulations set out by the GGP and GMC. Compliance with these policies, plans, and regulations would ensure that proposed future development in the surrounding areas would be compatible with the City's urban development.

Therefore, compliance with policies and regulations set out by the proposed NCSP, the GGP, and GMC would not cumulatively contribute to the cumulative impacts related to aesthetics and visual resources. Impacts would be less than significant.



4.16.7 SIGNIFICANT UNAVOIDABLE IMPACTS


No significant unavoidable impacts to tribal cultural resources have been identified.

4.16.8 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006, updated 2022*. Retrieved from <https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan7.pdf>.

City of Gardena. (2023). *Gardena Municipal Code*. Retrieved from [Chapter 18.42 GENERAL PROVISIONS \(codepublishing.com\)](#).

City of Gardena. (2022). *Normandie Crossing Specific Plan*.



5.0 OTHER CEQA CONSIDERATIONS



5.0 OTHER CEQA CONSIDERATIONS

5.1 ANY SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE MITIGATED

State CEQA Guidelines §15126.2(c) requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. The Project's environmental effects are addressed in **Sections 4.1** through **4.16** of this EIR. Project implementation would result in potentially significant impacts for the following topical issues: cultural resources, geology, hazards and hazardous materials, noise, recreation, tribal cultural resources, and utilities and service systems. Implementation of the City's standard Conditions of Approval (COA) and specified mitigation measures (MMs) provided in **Sections 4.1** through **4.16** would reduce these potential impacts to levels considered less than significant, except concerning construction-related noise impacts, which would remain significant and unavoidable, as discussed below.

5.0.1 NOISE

As specified in Gardena Municipal Code §8.36.080: Exemptions, construction activities are exempt from the City's noise standards, provided that construction activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, between 6:00 p.m. and 9:00 a.m. on Saturdays, or any time on Sundays and federal holidays. Project construction activities would be subject to compliance with GMC §8.36.080, thus, would not take place during the restricted hours. Therefore, the Project's construction activities would be exempt from the City's noise standards. Notwithstanding, the Project's estimated construction noise levels have been conservatively analyzed.

Project construction activities would result in a temporary significant unavoidable construction-related noise impact due to the increase in ambient noise levels and given the extended construction period, building height, and construction-related noise levels exceeding the City's standard by more than 10 dBA despite **MM NOI-1** and **MM NOI-2**. As such, it is conservatively concluded that the Project's construction-related noise impacts would remain significant and unavoidable.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

According to State CEQA Guidelines §15126(c), an EIR is required to address any significant irreversible environmental changes that would occur should a proposed project be implemented. As stated in State CEQA Guidelines §15126.2(d):



“.....uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would use limited, slowly renewable and non-renewable resources. This use would occur during Project construction and operations. Project construction activities would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and persons to and from individual construction sites. Construction would require the consumption of resources that are not renewable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed to power construction vehicles and equipment.

The resources that would be committed during future Project operations would be similar to those used by residential operations, including electricity, water, and fossil fuels for vehicle and delivery trips.

The Project site is fully developed with industrial uses and would require demolition activities to accommodate the proposed residential development. The demolition activities would be subject to compliance with the established regulatory requirements to ensure that any asbestos-containing materials, lead-based paints, and volatile organic compounds are not released into the environment. Compliance with the established regulatory framework and recommended mitigation would protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, Project implementation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the Project’s life. However, use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant.

5.3 GROWTH-INDUCING IMPACTS

State CEQA Guidelines §15126.2(e) requires that EIRs include a discussion of ways in which a project could induce growth. The State CEQA Guidelines identify a project as “growth-inducing” if it fosters economic or population growth or if it encourages the construction of additional



housing either directly or indirectly in the surrounding environment. New employees from a commercial or industrial development and new population from a residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Therefore, the Project would have a growth-inducing impact if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing;
- Remove obstacles to population growth;
- Require the construction of new or expanded facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

A project's potential to induce growth does not automatically result in growth. Growth can happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, the potential for growth inducement is not considered necessarily detrimental nor necessarily beneficial, and neither is it automatically considered to be of little significance to the environment.

5.0.1 DIRECTLY OR INDIRECTLY FOSTER ECONOMIC OR POPULATION GROWTH, OR THE CONSTRUCTION OF ADDITIONAL HOUSING

The Project site is developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. The Project would remove all onsite uses to develop a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within nine buildings at the Project site's southern portion and along the western site boundary. When implemented, the Project would increase population in the City. The Project's forecast population growth of 1,088 persons is anticipated to increase the City's existing 2023 population to 60,897 persons, representing an approximately 1.8 percent increase in population; see **Table 4.10-7: Existing Plus Project Growth Projections**. Therefore, the Project would induce direct population growth through the construction of additional housing. The Project is a residential development, which would have minimal employees that may include management and maintenance staff during operation. It is unlikely that the minimal number of potential employees would indirectly induce the need for the construction of additional housing. Additionally, the Project does not propose to extend roads or other infrastructure, thus, would not indirectly induce population growth in the City. Although the Project would directly increase the City's population, this growth is not considered substantial. Therefore, although the Project would induce unplanned direct population growth in the City through new homes, this impact is considered less than significant.



5.0.1 REMOVE OBSTACLES TO POPULATION GROWTH OR REQUIRE THE CONSTRUCTION OF NEW OR EXPANDED FACILITIES THAT COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS

The Project would not remove obstacles to population growth through the construction or extension of major infrastructure facilities. The Project site is developed and in an urban area bordered by existing residential uses and roadways. Therefore, the area is already served by existing utilities and service systems (i.e., water, wastewater, solid waste, natural gas, and electricity), which would provide services to the Project. While minor modifications to the existing utilities are required, major infrastructure already exists in the area. The utility improvements that are being implemented are distribution lines that would serve the proposed onsite land uses. The Project does not propose improvements that would extend services to areas that currently are not served or provide additional capacity in these infrastructure improvements, thereby facilitating new offsite development. There are no properties adjacent to the Project site that would benefit by having the utilities extended.

5.0.1 ENCOURAGE AND FACILITATE OTHER ACTIVITIES THAT COULD SIGNIFICANTLY AFFECT THE ENVIRONMENT, EITHER INDIVIDUALLY OR CUMULATIVELY

Project implementation is anticipated to have a beneficial economic effect. The introduction of new housing and residents to this Project site could encourage the creation of new businesses and services and provide a new customer base to help existing businesses. **Section 4.1** through **Section 4.16** of this EIR address the specific and potential cumulative Project impacts.

5.4 MANDATORY FINDINGS OF SIGNIFICANCE

CEQA requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project. An EIR has been prepared for the Project, which fully addresses the Mandatory Findings of Significance, as described below.

5.0.1 DEGRADATION OF THE ENVIRONMENT AND POTENTIAL IMPACTS ON HABITAT OR WILDLIFE SPECIES, AND CALIFORNIA HISTORY OR PREHISTORY

Would 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?

Degradation of the Environment. State CEQA Guidelines §15065(a)(1) requires a finding of significance if a project “has the potential to substantially degrade the quality of the



environment.” In practice, this is the same standard as a significant effect on the environment, which is defined in State CEQA Guidelines §15382 as “a substantial or potentially adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”

As discussed throughout this EIR, the Project has the potential to degrade the environment’s quality/result in significant environmental impacts concerning construction noise that would not be reduced to less than significant, despite compliance with the established regulatory framework (i.e., local, state, and federal regulations), Project COA, and with mitigation incorporated. This EIR in its entirety addresses and discloses all known potential environmental effects associated with Project development, including direct, indirect, and cumulative impacts. A summary of all potential environmental impacts, level of significance, and mitigation measures is provided in **Section 1.0: Executive Summary**.

Impacts on Habitat or Species. State CEQA Guidelines §15065(a)(1) states that “A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: (1) The project has 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 an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.” Because the Project site is fully developed and devoid of any natural habitats, the Project would not have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal. As such, the Initial Study prepared for the Project found that the Project would have no impact or a less than significant impact to biological resources. Therefore, biological resources are not evaluated in this EIR.

Impacts on California History and Prehistory. **Section 4.2: Cultural Resources** analyzed the Project’s potential impacts to historic and prehistoric cultural resources. Analysis found no recorded historic resources on the Project site. Analysis found that the existing onsite structures are not historically significant resources pursuant to State CEQA Guidelines §15064.5. However, the archaeological assessment determined the Project site has a moderate sensitivity for containing historic period (non–Native American) archaeological resources, which could be discovered during construction. Although such a discovery is unlikely, any previously unidentified archaeological resources, if present, have the potential to be significant under CEQA.

Additionally, as determined in the Project’s preliminary geotechnical investigation, the Project site’s surface area consists of weakly consolidated alluvial sediments dating back to the late Pleistocene, which are of an age to preserve fossil resources and therefore the Project would also



have high paleontological potential. As such, mitigation proposed within these sections, **Section 4.2: Cultural Resources**, **Section 4.4: Geology, Soils, and Paleontological Resources**, and **Section 4.14: Tribal Cultural Resources**, identifies the retention of a professional archaeologist (**MM CUL-1**), Native American tribal representative (**MM TCR-1**), and paleontologist (**MM GEO-1**) to monitor any ground disturbing activities. **MM TCR-2** in **Section 4.2: Cultural Resources** identifies steps to be taken in the event of an inadvertent discovery of an archaeological resource. **MM TCR-3** in **Section 4.2: Cultural Resources** identifies steps to be taken in the event of an inadvertent discovery of human remains where the NAHC resource designates the Gabrieleno Band of Mission Indians-Kizh Nation the Most Likely Descendent (“MLD”). The mitigation presented in these sections further lowered the significance of the potential impacts to less than significant levels. Therefore, the Project would not eliminate important examples of the major periods of California history or prehistory.

5.0.1 SHORT-TERM VS. LONG-TERM GOALS

State CEQA Guidelines §15065(a)(2) states that “A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.” **Section 5.2: Significant Irreversible Environmental Changes**, of this document addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. As summarized in **Section 5.2: Significant Irreversible Environmental Changes**, Project implementation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the Project’s life. However, use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant. In addition, **Section 1.0: Executive Summary** identifies all significant and unavoidable impacts that could occur that would result in a short-term impact on the environment. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities. Lastly, **Section 5.3: Growth-Inducing Impacts of the Proposed Action**, identifies any long-term environmental impacts associated with economic and population growth that are associated with the Project. The Project would directly, but not indirectly, generate population growth in the City. However, the Project would not remove obstacles to population growth through the construction or extension of major infrastructure facilities.

5.0.1 CUMULATIVELY CONSIDERABLE IMPACTS

Would 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

State CEQA Guidelines §15065(a)(3) states that “A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the project has potential environmental effects that are individually limited but cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” As discussed throughout this EIR, the Project the Project could have impacts that are individually limited, but cumulatively considerable. This EIR in its entirety addresses and discloses all known potential cumulative environmental impacts. Cumulative impacts are addressed in **Section 4.1** through **Section 4.16**.

5.0.1 SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS

Would the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As required by State CEQA Guidelines §15065(a)(4), “A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.” Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This standard relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could directly or indirectly affect human beings would be possible in all of the CEQA issue areas identified in the Initial Study, those that could directly affect human beings are aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, land use and planning, public services and utilities, transportation, water resources, wildfire hazards, and climate change, all of which are addressed in the appropriate sections of this EIR and in the Initial Study; see Table of Contents for specific section numbers. The following topic area was determined to be significant and unavoidable with respect to adverse effects on human beings:

- **Construction Noise:** Project construction activities would result in a temporary significant unavoidable construction-related noise impact due to the increase in ambient noise levels and given the extended construction period, building height, and construction-related noise levels exceeding the City’s standard by more than 10 dBA despite **MM NOI-1** and **MM NOI-2**.



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An architectural rendering of a modern multi-story residential building. The building features a mix of light-colored panels and dark window frames. A central courtyard contains a swimming pool with a wooden deck, lounge chairs, and a small tree. The pool is enclosed by a glass railing. In the foreground, there are several rooftop terraces with wooden decking and some greenery. The overall scene is bright and clear, suggesting a sunny day.

6.0 ALTERNATIVES TO THE PROPOSED PROJECT



6.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under the California Environmental Quality Act (CEQA), the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) §21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding project alternatives is further provided in State CEQA Guidelines §15126.6(a), as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.

The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."¹ The State CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.²

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. State CEQA Guidelines §15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...

Beyond these factors, State CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. "If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."³ In addition, State CEQA Guidelines

¹ State CEQA Guidelines §15126.6(b).

² State CEQA Guidelines §15126.6(f).

³ State CEQA Guidelines §15126.6(e)(2).



§15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

6.1 PROJECT SUMMARY

The Normandie Crossing Specific Plan Project site is in the County of Los Angeles, approximately 12 miles southwest of downtown Los Angeles, in the southeast portion of the City of Gardena ("City"), at 16829, 16835, and 16907 South Normandie Avenue. The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west.

The Project proposes a 403-dwelling unit (DU) multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within nine buildings at the Project site's southern portion and along the western site boundary. The Project also proposes offsite sidewalk and railroad improvements. The offsite sidewalk improvements are proposed along the south side of 169th Street, west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. The offsite track and other railroad improvements are proposed on South Normandie Avenue along the Project site's eastern boundary, pursuant to California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines. To allow the proposed development, the Applicant is proposing the Normandie Crossing Specific Plan (NCSP) (SP #1-21), which would establish the site-specific zoning regulations and development standards for this area. The NCSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. In addition to requiring a Specific Plan, the Project requires various other approvals, including the following: General Plan/General Plan Map Amendment (GPA #3-21), Zone Change and Zone Map Amendment (ZC #4-21), Zoning Text Amendment (ZTA #6-21), Normandie Crossing Specific Plan (NCSP) (SP #1-21), Site Plan Review (SPR #11-21), Vesting Tentative Tract Map (TTM #4-21), Development Agreement (DA #2-21), and CPUC General Order 88-B Permit). A full project description is provided in **Section 2.0: Project Description**.

6.2 PROJECT OBJECTIVES

The proposed Project objectives presented below are, as outlined, in **Section 2.5: Goals and Objectives**.



1. Diversify the City of Gardena’s existing housing options, by providing a range of housing types and sizes, to serve the region’s growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.
2. Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish housing development that meets high standards of design and pursues environmental sustainability.
5. Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City’s Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.

6.3 PROJECT IMPACTS

6.3.1 PROJECT SIGNIFICANT AND UNAVOIDABLE IMPACTS

Per State CEQA Guidelines, only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. As discussed throughout **Section 4.0: Environmental Analysis**, there would be a significant and unavoidable Project impact related to construction noise. There would be no other significant and unavoidable Project impacts.

6.3.2 IMPACTS THAT CAN BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE

Impacts associated with the following topics would be significant without incorporation of mitigation measures, but would be reduced to a less-than-significant level with incorporation of the mitigation measures identified in the EIR:

- Cultural Resources – cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15065.5; disturb human remains.
- Geology and Soils (Paleontological Resources) – directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
- Hazards and Hazardous Materials – create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.
- Recreation – include recreational facilities which might have an adverse effect on the environment.
- Tribal Cultural Resources – cause a substantial adverse change in the significance of a tribal cultural resource.



- Utilities - result in the relocation or construction of new or expanded water, wastewater conveyance, stormwater drainage, electric power, and telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

6.4 PROJECT ALTERNATIVES

The analysis presented below compares the potential environmental impacts associated with the following alternatives to impacts from the proposed Project:

- “No Project/No Construction” Alternative;
- “No Project/Existing Land Use Designation” Alternative;
- “Reduced Density” Alternative.

Throughout the following analysis, the alternatives’ impacts are analyzed for each environmental issue area, as examined in **Sections 4.1: Air Quality** through **4.16: Aesthetics**. In this manner, each Alternative can be compared to the Project on an issue-by-issue basis. **Table 6-3: Comparison of Alternatives**, included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each Alternative’s impacts in relation to the Project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible. **Section 6.6: Environmentally Superior Alternative**, references the “environmentally superior” Alternative, as required by the State CEQA Guidelines.

6.4.1 “NO PROJECT” ALTERNATIVES

Under State CEQA Guidelines §15126.6(e), the specific Alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The “no project” analysis is required to discuss the existing conditions (at the time the Notice of Preparation is published), as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The discussion of the no project alternative usually proceeds along one of two lines. If the project is not a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Here, the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.



Therefore, two “no project” alternatives are analyzed below: the circumstance under which the Project does not proceed and the Project site remains in its existing state (the “No Project/No Construction” Alternative); and the circumstance under which the Project does not proceed, but the Project site is developed, based on current plans (i.e., Gardena General Plan (GGP) and Gardena Municipal Code Zoning Ordinance (GMC)) and consistent with available infrastructure and community services (what would reasonably be expected to occur in the foreseeable future, if the Project were not approved) (the “No Project/Existing Land Use Designation” Alternative).

6.4.2 “NO PROJECT/NO CONSTRUCTION” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Project site is within a fully urbanized area and is generally surrounded by single- and multi-family residential uses. As depicted in **Exhibit 2-2: Local Vicinity Map**, the Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. Approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. One of the buildings on Parcel 4 contains approximately 9,324 SF of industrial floor area that is in a dilapidated condition and is not occupiable, therefore, only 106,100 SF of industrial uses are currently operational. Additionally, the Project site includes a railroad spur from the adjacent UPRR northern track. The spur is associated with former onsite industrial operations but is no longer in use. **Table 2-1: Existing Onsite Land Uses**, summarizes the land uses that are present within the Project site and surrounding area.

The No Project/No Construction Alternative would retain the Project site in its current condition. With this Alternative, the Project site’s existing improvements would remain and the approximately 106,100 SF of industrial uses would continue to operate. None of the proposed Project improvements would be implemented. Further, the Project’s requested entitlement (i.e., General Plan/General Plan Map Amendment (GPA #3-21), Zone Change and Zone Map Amendment (ZC #4-21), Zoning Text Amendment (ZTA #6-21), Normandie Crossing Specific Plan (NCSP) (SP #1-21), Site Plan Review (SPR #11-21), Vesting Tentative Tract Map (TTM #4-21), Development Agreement (DA #2-21), and CPUC General Order 88-B Permit) would not be granted. The following discussion evaluates the potential environmental impacts associated with the No Project/No Construction Alternative, as compared to impacts from the proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

The Project’s short-term air quality impacts from demolition, grading, and construction activities would be less than significant. Under the No Project/No Construction Alternative because there would be no development, and no construction-related air pollutant emissions would be generated. This Alternative would also not expose sensitive receptors to substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework.



The Project's operational emissions would not exceed significance thresholds, thus would be less than significant. Similar to the proposed Project, with continuation of existing uses, there would be no emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. As with the proposed Project, operational impacts would be less than significant under this Alternative.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding air quality, because although the Project would not exceed short- or long-term air emissions thresholds, the existing conditions (this Alternative) would generate less criteria pollutants than the proposed Project.

Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to potentially discovered archaeological resources, with mitigation incorporated. Under this Alternative, these potential Project impacts would be avoided, as no ground disturbing activities would occur. This Alternative would also avoid the Project's potential for disturbing human remains, which is concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding cultural resources. Under this Alternative, there would be no potential for impacting resources since no ground disturbing activities would occur.

Energy

The Project would result in construction-related energy consumption from water, diesel fuel, and gasoline usage; see **Table 4.3-5: Project and Countywide Energy Consumption**. However, the Project would result in less than significant impacts concerning construction-related energy usage since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the No Project/No Construction Alternative, construction-related energy consumption would not occur because no development would occur. Therefore, the No Project/No Construction Alternative would have no impact concerning energy demand, whereas the Project would result in a less than significant impact.

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the No Project/No Construction Alternative, no change in existing operational electricity, natural gas, gasoline, or diesel fuel consumption would occur, as would occur with the proposed Project. Although this Alternative would generate less electric power demand than the Project (see **Table 4.15-8: Estimated Project Electric Power**



Demand), the existing use consists of industrial buildings initially constructed between 1952 and 1976, which are not operating under the latest CALGreen standards as would the Project. For this reason, and since the Project would not generate a natural gas demand, this Alternative is assumed to result in inefficient energy consumption.

The No Project/No Construction Alternative would result in greater impacts than the proposed Project regarding energy consumption because although no construction-related energy consumption would occur, this Alternative would not operate under the latest CALGreen standards, thus, is assumed to result in inefficient energy consumption and would continue to consume natural gas, whereas the Project would not consume any.

Geology, Soils, and Paleontological Resources

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. Since the No Project/No Construction Alternative would not involve construction, this Alternative would avoid the Project's potential for impacting unique paleontological resources. This Alternative would have no impact on paleontological resources, whereas the Project's impacts would be less than significant with mitigation incorporated.

The No Project/No Construction Alternative would result in less impacts than the proposed Project regarding paleontological resources. There would be no potential for impacting resources since no ground disturbing activities would occur.

Greenhouse Gas Emissions

The Project would result in less than significant construction-related greenhouse gas (GHG) emissions and direct and indirect operational GHG emissions, as concluded in **Section 4.5: Greenhouse Gas Emissions**. Direct operational emissions include GHG emissions from operational vehicular traffic, onsite combustion of natural gas, and landscaping equipment. Indirect operational emissions include GHG emissions from offsite generation of electrical power and the energy required to convey water to and wastewater from the Project site. Under the No Project/No Construction Alternative, there would be no construction activities or new development, thus there would be no short-term GHG emissions nor long-term direct and indirect operational GHG emissions. This Alternative would not generate additional GHG emissions, whereas the Project's GHG emissions would be less than significant.

The Project's construction emissions and increase in operational GHG emissions would not occur under the No Project/No Construction Alternative. Therefore, the No Project/No Construction Alternative would result in less impact than the proposed Project regarding GHG emissions.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant. These impacts would be avoided with the No Project/No Construction Alternative since no construction would occur. This Alternative would result in no impact concerning construction activities, whereas the Project's impact would be less than significant with mitigation incorporated.

The Project's operational-related impacts concerning tetrachloroethene (PCE) concentrations that exceed Department of Toxic Substance Control (DTSC) screening levels for residential applications, which was considered less than significant with mitigation incorporated, would be avoided with this Alternative, as no residential uses would be developed. However, under this Alternative, existing operations which consist of the use, storage, and transportation of hazardous materials associated with industrial uses, would continue. As discussed in **Section 4.6: Hazards and Hazardous Materials**, the existing industrial uses involved materials (e.g., paints and oils), which were found to be properly labeled and stored at the time of the assessment, and there were no signs of leaks, stains, or spills. Thus, the existing use was not considered a recognized environmental concern. This Alternative would result in less than significant operational impacts, as would the Project.

The No Project/No Construction Alternative would result in less impacts than the proposed Project regarding hazards and hazardous materials, since no construction or ground disturbing activities would occur, and no buildings or structures would be demolished.

Hydrology and Water Quality

The Project would result in less than significant short-term water quality impacts following compliance with National Pollutant Discharge Elimination System (NPDES) and GMC requirements. The No Project/No Construction Alternative would not result in short-term water quality impacts since no construction activities would occur. The Project's less than significant short-term water quality impacts would be avoided with this Alternative.

Following compliance with NPDES and GMC requirements, which include implementation of water quality best management practices (BMPs), the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. The last building permit on the Project site was issued in approximately 1987. Therefore, the No Project/No Construction Alternative would involve continued operations, which do not include water quality facilities compliant with current NPDES and GMC requirements. As such, this Alternative is assumed to result in potentially greater operational water quality impacts, than the Project.

The Project would not impede or redirect flood flows and would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. The No Project/No Construction



Alternative's long-term hydrology impacts would be greater than the proposed Project since the decrease in the existing peak flow rates that would occur with the proposed Project would not occur under this Alternative.

The Project's potential construction-related impacts to groundwater would be less than significant with mitigation incorporated. The Project would decrease potential impacts to groundwater resources, as compared to existing conditions, through a decrease in impervious surfaces and increase in infiltration of stormwater runoff. As with the Project, this Alternative's impacts concerning demand for groundwater supplies would be less than significant. Under the No Project/No Construction Alternative, less groundwater recharge would occur than with the Project due to the existing condition's larger impervious surface area and lesser infiltration rate.

The No Project/No Construction Alternative would result in greater impacts regarding hydrology and water quality, since no increase in infiltration of stormwater runoff or decrease in impervious surfaces would occur.

Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations to Specific Plan, and Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, a Zone Change and Zone Map Amendment, Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6: Agreements, Permits, and Approvals**. The No Project/No Construction Alternative would retain the Project site in its current condition – none of the existing land uses would be removed and the apartment building and townhomes would not be constructed. The No Project/No Construction Alternative would not require any discretionary permits/approvals.

The No Project/No Construction Alternative would result in less impact than the proposed Project concerning land use and planning because it would avoid the Project's proposed General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, Zoning Code Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others.

Noise

The Project's construction-related noise impacts would be significant and unavoidable despite implementation of mitigation concerning construction equipment and requiring a temporary noise barrier. The Project's construction-related vibration impacts would be less than significant with mitigation. Under the No Project/No Construction Alternative, no new land uses would be constructed. Therefore, this Alternative would avoid the Project's construction-related noise and vibration impacts.



Table 4.9-11: Composite Noise Impacts identifies the existing ambient noise levels (L_{eq}) and the Project's composite noise levels. As shown in **Table 4.9-11**, the composite noise level, which accounts for onsite Project-related noise sources such as mechanical equipment, parking facility, and outdoor uses, would be below the significance thresholds, resulting in a less than significant impact. Noise associated with industrial uses is generally considered higher than residential uses. Thus, under the No Project/No Construction Alternative, existing noise levels, which are likely higher than the proposed Project's, would continue. See **Section 4.9: Noise**, for existing noise levels surrounding the Project site.

The Project would result in less than significant impacts from operational off-site traffic noise sources. Under this Alternative, mobile-source noise associated with trucks from the existing industrial uses, would continue. The No Project/No Construction Alternative could generate greater mobile source noise than the Project since this Alternative involves truck traffic.

The No Project/No Construction Alternative would result in less impacts than the proposed Project regarding noise. Although the Project's increase in offsite roadway traffic noise would be negligible and the operational noise would be less than existing conditions, the Project's construction-related noise impacts would be significant and unavoidable and would be avoided under the No Project/No Construction Alternative.

Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7: Existing Plus Project Growth Forecast**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. Under the No Project/No Construction Alternative, the Project site would remain in its present condition, - no housing would be developed, and no population growth would occur. Unlike the proposed Project, this Alternative would not induce unplanned population growth. Like the Project, this Alternative would not displace existing housing.

The 2021-2029 (6th Cycle) Housing Element Update (HEU) identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6: City of Gardena RHNA Allocation**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation. Under this Alternative, no DUs would be constructed, thus, this Alternative would not be in furtherance of meeting the City's RHNA allocation. However, Housing Elements include a housing buffer in the sites inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's exclusion of housing would not preclude the City from meeting their RHNA obligation.



The No Project/No Construction Alternative would result in greater impacts than the proposed Project regarding housing and population because this Alternative would not be in furtherance of the City meeting its 6th Cycle RHNA allocation.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact. The No Project/No Construction Alternative would retain the existing land uses, with no increase in population or demand for these services and facilities.

The Project is forecast to generate a student population growth of approximately 151 students at the Los Angeles Unified School District (LAUSD), which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The No Project/No Construction Alternative would retain the existing land uses, with no increase in student population or demand for school facilities.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding public services, since increases in demands for police, fire, medical, schools, and library services would not occur, although neither would require construction of new or physically altered facilities.

Recreation

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but it would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Because the No Project/No Construction Alternative does not involve residential uses, this Alternative would not increase the use of existing facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project does propose onsite open space and recreational amenities, which would result in a less than significant physical effect on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would be avoided with this Alternative, as no recreational uses would be developed.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding recreational facilities since increases in demand for recreational facilities and construction of new facilities would not occur under this Alternative.



Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The No Project/No Construction Alternative would retain the existing land uses and would also not conflict with a program, plan, ordinance, or policy addressing the circulation system.

The Project is located within a low vehicle miles traveled (VMT) generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. Under the No Project/No Construction Alternative, the existing industrial use would continue to operate and is assumed to involve fewer cars and light trucks, but more heavy-duty trucks, than the Project. Because VMT refers to the amount and distance of automobile (cars and light trucks) travel and does not include heavy-duty truck travel, this Alternative is anticipated to generate less VMT than the Project, although the Project would result in a less than significant impact.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary Project construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. The No Project/No Construction Alternative would not result in any construction activities; thus, emergency access would remain unchanged.

The No Project/No Construction Alternative would result in less impact than the Project regarding VMT. Under this Alternative, fewer VMT would be generated.

Tribal Cultural Resources

The Project would result in less than significant potential impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. Under this Alternative, these potential Project impacts would be avoided, as no ground disturbing activities would occur.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding tribal cultural resources. There would be no potential for impacting tribal cultural resources under this Alternative since no ground disturbing activities would occur.

Utilities and Service Systems

As shown in Table 4.15-7: Estimated Project Wastewater Generation, Table 4.15-8: Estimated Project Electric Power Demand, and Table 4.15-9: Estimated Project Water Demand, Project operations would increase wastewater generation, and electricity and water demand compared to the existing industrial land uses. However, the Project would decrease solid waste generation,



as industrial uses have higher solid waste generation rates than residential.⁴ The Project would require construction of new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. Notwithstanding, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of these facilities. Under this Alternative, no utility and service system facilities would be constructed, therefore, the Project's environmental effects associated with construction of proposed utilities and service systems would be avoided.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding utilities and service systems since the Project's environmental effects associated with construction of utilities and service systems would be avoided.

Aesthetics

Under this Alternative, the site's visual character/quality would not be altered, as the proposed apartment building and townhomes would not be developed, and the existing land use would not be removed. The existing landscape, including the blighted industrial buildings and associated onsite parking, would not be removed, or replaced with the proposed multi-family residential structures. A portion of one existing building is dilapidated, and the property is inadequately maintained and devoid of landscaping. Although the existing uses conform to the current land use, the subject property is surrounded by single- and multi-family residential development, and the property is an eyesore in the neighborhood. The lighting associated with the existing use would continue. Removal of the existing buildings and replacement with the multi-family residential structure that would occur with the Project, would not occur under this Alternative. The Project's generation of light and glare, which was concluded to be a less than significant impact, would not occur with this Alternative, but the existing industrial lighting would continue.

The No Project/No Construction Alternative would result in more impact than the proposed Project regarding aesthetics because the site's existing light and glare would remain under this Alternative and the existing dilapidated structure and industrial uses would remain adjacent to residential uses.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/No Construction Alternative would not meet any of the Project objectives, as identified above.

6.4.3 "NO PROJECT/EXISTING LAND USE DESIGNATION" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

This Alternative consists of a "No Project" condition whereby the Project site is redeveloped pursuant to the existing General Plan land use designation. **Table 2-2: Existing Land Use**

⁴ California Department of Resources Recycling and Recovery (CalRecycle). (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>, accessed July 2023.



Designations and Zoning identifies the GGP land use designations for the Project site and indicates the Project site is designated Industrial, which provides for a wide range of industries, technology-related uses and supporting facilities, and business parks. Additionally, the GGP assigns a High Density 30 Overlay to the northern approximately 1.4 acres of the Project site. Based on the existing Industrial land use designation, the Project site’s maximum development capacity is approximately 228,690 SF of industrial floor area; see **Table 4.8-2: Existing General Plan Land Use Designations**. It is noted, although the High Density 30 Overlay on the Project site’s northerly 1.4 acres would allow development of residential uses, only industrial uses would be allowed on the site’s southerly portion. Also, because no roadway or other buffer would exist between these two areas, this Alternative assumes no residential development on the Project site. Therefore, this Alternative assumes demolishing the existing 115,424 SF of industrial uses and in their place constructing up to 228,690 SF of industrial uses. Given that the Industrial land use designation is intended for a wide range of industrial uses, and since the Project site is surrounded by residential uses, this Alternative assumes development of an industrial business park, which could include any uses permitted within the Industrial zone; see GMC §18.36.020. Because the proposed access driveways under this Alternative are unknown, it is unknown whether it, like the Project, would require offsite railroad improvements pursuant to California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines.

Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative compares development under the Project and the No Project/Existing Land Use Designation Alternative.

Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative

Description	Apartment Building (DU) ¹	Townhomes (DU) ¹	Density (DU/AC) ¹	Floor Area (SF) ¹
Proposed Project	328	75	77	429,000 (Residential)
No Project/Existing Land Use Designation Alternative				228,690 (Industrial)
<i>Difference</i>	-328	-75		-200,310
<i>% Difference</i>	-100%	-100%		-47%

Note:
 1. DU = dwelling units; AC = acre; SF = square feet.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

The Project’s short-term air quality impacts from demolition, grading, and construction activities would be less than significant. The No Project/Existing Land Use Designation Alternative proposes approximately half as much floor area as the Project; thus, this analysis assumes this Alternative would result in less construction emissions as presented in **Table 4.1-5: Construction Air Pollutant Emissions**. Like the Project, this Alternative would not expose sensitive receptors to



substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework.

As shown in **Table 4.1-6: Operational Air Pollutant Emissions**, the Project's operational criteria pollutant emissions would be below the SCAQMD's mass daily significance thresholds resulting in a less than significant air quality impact. As also shown in **Table 4.1-6**, the approximately 106,100 SF of existing industrial land uses also generate emissions well below the SCAQMD's mass daily significance thresholds. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational criteria pollutant emissions would be approximately double the existing emissions shown in **Table 4.1-6** but would still be below the SCAQMD's mass daily significance threshold, and significantly less than the proposed Project's operational criteria pollutant emissions. Thus, under the No Project/Existing Land Use Designation Alternative, there would be less emissions than with the Project. As with the proposed Project, this Alternative's operational air quality emissions would be less than significant.

The No Project/Existing Land Use Designation Alternative would result in less impact than the proposed Project regarding air quality because although the Project would not exceed short- or long-term air emissions thresholds, this Alternative would generate less criteria pollutants than the proposed Project.

Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated. Also, the Project's potential to disturb as yet undiscovered human remains is concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated. The No Project/Alternative Land Use Designation Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur, with mitigation incorporated under this Alternative.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding cultural resources. Under this Alternative, ground disturbing activities would occur within a similar footprint as the Project.

Energy

As shown in **Table 4.3-5: Project and Countywide Energy Consumption**, the Project would result in construction-related energy consumption from water, diesel fuel, and gasoline usage. However, the Project would result in less than significant impacts concerning construction-related energy consumption since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the No Project/Existing Land Use Designation Alternative, construction-related energy consumption would be less than the Project, given this Alternative proposes approximately half as much floor



area as the Project. However, both the Project and this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction, resulting in a less than significant impact concerning energy.

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use; see **Table 4.3-5**. The Project would be subject to compliance with applicable energy standards; therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the No Project/Existing Land Use Designation Alternative, operational energy consumption would be less than the Project, given this Alternative would involve approximately half as much floor area as the Project. As also shown in **Table 4.3-5**, the approximately 106,100 SF of existing industrial land uses consume a nominal amount of total energy consumption in the County. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational energy consumption would be approximately double the energy consumption shown in **Table 4.3-5**, but would still be nominal, and significantly less than the proposed Project's operational energy consumption. The Project would not generate a natural gas demand and it is unknown whether this Alternative would do so. Notwithstanding, both the Project and this Alternative would operate under the latest CALGreen standards, and would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations, resulting in a less than significant impact concerning energy.

Geology, Soils, and Paleontological Resources

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. Since the No Project/Existing Land Use Alternative would also involve demolition and ground disturbing construction activities, similar impacts would occur with mitigation incorporated.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding paleontological resources. Under this Alternative, ground disturbing activities would occur within a similar footprint as the Project.

Greenhouse Gas Emissions

The Project would result in less than significant construction-related GHG emissions and direct and indirect operational GHG emissions, as concluded in **Section 4.5**. Under the No Project/Existing Land Use Designation Alternative, less construction-related GHG emissions would occur than with the Project because this Alternative proposes approximately half the floor area.

As shown in **Table 4.5-3: Summary of Operational GHG Emissions**, the approximately 106,100 SF of existing industrial land uses would generate GHG emissions well below the proposed



Project's emissions. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational GHG emissions would be approximately double the existing GHG emissions shown in **Table 4.5-3** but would still be approximately half of the Project's operational GHG emissions. Thus, under the No Project/Existing Land Use Designation Alternative, there would be approximately half the GHG emissions as the proposed Project. Like the proposed Project, this Alternative's operational GHG emissions would be less than significant.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant. The No Project/Existing Land Use Designation Alternative would also involve construction activities, thus this Alternative, like the Project, would result in a less than significant impact with mitigation incorporated.

The Project's operational-related impacts concerning PCE concentrations that exceed DTSC screening levels for residential applications, which was considered less than significant with mitigation incorporated, would be avoided with this Alternative, as no residential uses would be developed. However, under this Alternative, it is unknown whether mitigation would be required for PCE concentrations that exceed DTSC screening levels for industrial business park applications. Project operations would involve the use of typical hazardous materials/chemicals associated with residential uses, whereas this Alternative could involve transport, handling, storage, and disposal of hazardous substances associated with industrial business park uses. As such, although operations under this Alternative must adhere to federal, state, and local regulations, an industrial use is considered to have greater potential for accidental upset or accident conditions concerning hazardous materials.

The No Project/Existing Land Use Designation Alternative would result in greater impacts than the Project regarding hazards and hazardous materials because it proposes an industrial business park use with greater potential for accidental upset or accident conditions concerning hazardous materials, as compared to the Project which proposes residential uses.

Hydrology and Water Quality

Like the Project, the No Project/Existing Land Use Designation Alternative construction activities would result in less than significant short-term water quality impacts following compliance with NPDES and GMC requirements. However, this Alternative's impacts would be less than the Project's since the Alternative proposes approximately half the floor area.



Following compliance with NPDES and GMC requirements, which include implementation of water quality BMPs, the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Similarly, the No Project/Existing Land Use Designation Alternative would result in less than significant operational water quality impacts following compliance with current NPDES and GMC requirements. As such, this Alternative is assumed to result in similar operational water quality impacts as the Project.

The Project would not impede or redirect flood flows and would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. This Alternative is also anticipated to decrease the site's impervious surface coverage, although to a lesser degree than the Project given industrial business parks are not required to provide minimum open space areas, as are residential uses. Like the Project, this Alternative would not impede or redirect flood flows or modify peak flow rates, since a no net increase in flows would be expected. Also, similar to the Project, this Alternative would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems.

The Project's potential construction-related impacts to groundwater would be less than significant with mitigation incorporated. The Project would decrease potential impacts to groundwater resources through a decrease in impervious surfaces and increase in infiltration of stormwater runoff. As with the Project, this Alternative's impacts concerning demand for groundwater supplies would be less than significant. The No Project/Existing Land Use Designation Alternative proposes approximately half as much floor area as the Project. Assuming more area devoted to the industrial business park and impervious surfaces, this Alternative would have more impervious surfaces compared to the Project, given industrial business parks are not required to provide minimum open space areas, and therefore less groundwater infiltration. Under the No Project/Existing Land Use Designation Alternative, less groundwater recharge would occur than with the Project.

The No Project/Existing Land Use Designation Alternative would result in greater impacts than the proposed Project regarding hydrology and water quality, since less infiltration of stormwater runoff or decrease in impervious surfaces would occur under this Alternative.

Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations with Specific Plan, and the Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, Zoning Text Amendment, and



Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6: Agreements, Permits and Approvals**. The No Project/Existing Land Use Designation Alternative would not change the Project site's existing land uses designations or zoning but would demolish the existing onsite land uses and construct 228,690 SF of industrial business park land uses. The No Project/Existing Land Use Designation Alternative would likely require fewer discretionary permits/approvals than the Project, depending on the proposed Site Plan.

The No Project/Existing Land Use Designation Alternative would result in less impact than the proposed Project concerning land use and planning because it would avoid the Project's proposed General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP).

Noise

The Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning construction equipment and a temporary noise barrier, based on exceedance of noise standards, the proposed building height (seven stories), and extended construction period. The Project's construction-related vibration impacts would be less than significant with mitigation. Although the No Project/Existing Land Use Designation Alternative's construction activities would occur over a shorter time period and involve less building height and approximately half the floor area as the Project, this Alternative's construction activities would take place within a similar footprint and distance from sensitive receptors, and thus are likely to exceed noise standards. Therefore, like the Project, this Alternative is anticipated to result in a significant and unavoidable construction noise impact.

As shown in **Table 4.9-11**, the Project's composite stationary source noise level would be below the significance thresholds, resulting in a less than significant impact. Noise associated with industrial business park uses is generally considered higher than residential uses. Noise-producing equipment typical of industrial business park uses includes rooftop mechanical ventilation units, truck deliveries, truck loading/unloading, trash compactors, forklifts, and generators. The cumulative noise level from industrial business park equipment would vary at the property line depending on the location and orientation of the equipment, the amount of each type of equipment, and the size of each type of equipment. Thus, under the No Project/Existing Land Use Alternative, the operational noise levels would likely be higher than the Project's, although this Alternative would also be subject to compliance with the City's noise standards.

The Project would result in less than significant impacts from mobile noise sources. This Alternative would also be anticipated to result in less than significant impacts from mobile noise sources, as it is not anticipated to double existing traffic levels. However, given this Alternative would involve an industrial business park, which would likely involve truck traffic, greater mobile source noise impacts could occur as this Alternative than the Project.



Like the Project, the No Project/Existing Land Use Designation Alternative would result in a significant unavoidable construction noise impact, therefore, this Alternative would result in similar impacts as the proposed Project regarding construction noise and vibration. However, this Alternative would result in greater operational impacts than the proposed Project.

Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. Under the No Project/Existing Land Use Designation Alternative, approximately 228,690 SF of industrial business park uses would be constructed, no housing would be developed, and no population growth would occur. Unlike the proposed Project, this Alternative would not induce unplanned population growth. Like the Project, this Alternative would not displace existing housing. Since the No Project/Existing Land Use Designation Alternative assumes development consistent with the GGP, as presented in **Table 6-1**, it would not exceed the growth forecasts from the relevant planning documents. Therefore, as with the Project, this Alternative would result in less than significant impacts regarding unplanned population growth.

The 6th Cycle HEU identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation. Under this Alternative, no DUs would be constructed, thus, this Alternative would not be in furtherance of meeting the City's RHNA allocation. However, Housing Elements include a housing buffer in the sites inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's exclusion of housing would not preclude the City from meeting their RHNA obligation and the City would be able to make the findings required under Government Code §65863.

The No Project/Existing Land Use Designation Alternative would result in greater impacts than the proposed Project regarding population and housing because this Alternative would not be in furtherance of the City meeting its 6th Cycle RHNA allocation.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact. Like the proposed Project, the No Project/Existing Land Use



Designation Alternative would generate an incremental increase in demand for fire and police protection, but none for library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, like the Project, this Alternative would not require construction of new or physically altered fire and police protection facilities, resulting in a less than significant impact.

The Project is forecast to generate a student population growth of approximately 151 students at the LAUSD, which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The No Project/Existing Land Use Designation Alternative would involve an industrial business park, with no increase in student population or demand for school facilities.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding public services. Incremental increases in demands for public services would occur, but like the Project, this Alternative would not result in the need for construction of new or physically altered facilities.

Recreation

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but it would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Because the No Project/Existing Land Use Designation Alternative does not involve residential uses, this Alternative would not increase the use of existing facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project proposes onsite open space and recreational amenities, which would result in a less than significant physical effects on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would be avoided with this Alternative, as no recreational uses would be developed. The No Project/Existing Land Use Designation Alternative would result in less impact than the proposed Project regarding recreational facilities since increases in demand for recreational facilities and construction of new facilities would not occur under this Alternative.

Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The No Project/Existing Land Use Designation Alternative would be subject to compliance with the applicable programs, plans, ordinances, or policies, thus, is also not anticipated to result in a conflict in this regard.



The Project is located within a low VMT generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. Under the No Project/Existing Land Use Designation Alternative, the industrial business park would operate on the Project site, which is assumed to involve fewer cars and light trucks, but more heavy-duty trucks, than the Project. Because VMT refers only to the amount and distance of automobile (cars and light trucks) travel and does not include heavy-duty truck travel, this Alternative is anticipated to generate less VMT than the Project, although the Project would result in a less than significant impact.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary Project construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. Because the proposed access driveways under the No Project/Existing Land Use Designation Alternative are unknown, it is unknown whether it, like the Project, would require traffic lane, parking lane and/or sidewalk closures. It is also unknown whether UPRR improvements would be required under this Alternative. If this Alternative required the partial or full closure of streets or sidewalks, it would be required to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access.

Although the Project's transportation impacts would be less than significant, the No Project/Existing Land Use Designation Alternative would result in less impact than the Project regarding VMT because under this Alternative, fewer VMT would be generated.

Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. The No Project/Alternative Land Use Designation Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur, with mitigation incorporated.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding tribal cultural resources similar ground disturbing activities would occur within the same footprint as the Project.

Utilities and Service Systems

As shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9** Project operations would increase wastewater generation, electricity demand, and water demand as compared to existing conditions. However, the Project would decrease solid waste generation, as industrial uses have higher solid waste generation rates than residential. The Project would require construction of



new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. Notwithstanding, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed utilities and service systems. Under the No Project/Existing Land Use Designation Alternative, operations would increase wastewater generation, electricity demand, water demand, and solid waste generation compared to the existing industrial land uses, however, to a lesser degree than the Project since residential land uses typically generate greater demand. As also shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9**, the approximately 106,100 SF of existing industrial land uses' wastewater generation, electricity demand, water demand, and solid waste generation is far less than the proposed Project's. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational wastewater generation, electricity demand, water demand, and solid waste generation would be approximately double the generations/demands under existing conditions, but significantly less than the proposed Project's generations/demands. Notwithstanding, with mitigation incorporated, this Alternative would also result in less than significant environmental effects associated with construction of utilities and service systems given the area's built out conditions.

The No Project/Existing Land Use Designation Alternative would result in less demands concerning utilities and service systems than the Project, but similar impacts concerning environmental effects associated with construction of the proposed utilities and service systems.

Aesthetics

The Project proposes an apartment building approximately 90 feet tall and nine townhome buildings approximately 40 feet tall, as measured from the finished floor (i.e., the level of the finished floor on the ground level) of the roof's highest point. This Alternative assumes redevelopment of the existing blighted industrial use; the existing 106,100SF industrial use and associated surface parking would be removed and replaced with a 228,690 SF industrial business park development. With this Alternative, the degree of visual alteration would be less than the Project since this Alternative proposes a land use similar in scale and mass to existing conditions, and approximately half as much floor area as the Project. Further, per GMC § 18.32.050, this Alternative would not propose structures exceeding 35 feet since the site is within 100 feet of a zone R-1 and R-2 zone. Although this Alternative would involve less change from existing conditions concerning scale and mass, the Project would introduce residential uses, which would be more compatible with the surrounding residential uses.

The existing urbanized area is comprised primarily of residential land uses. The Project would not result in a significant source of light or glare. This Alternative would introduce new sources of light and glare as well, but to a lesser degree than with the Project since this Alternative involves approximately half as much floor area of development. Although both the Project and this



Alternative would not cause a significant source of light or glare, this Alternative would result in less impact than the Project.

Therefore, this Alternative would result in less impacts as the proposed Project regarding aesthetics/light and glare.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/Existing Land Use Designation Alternative would not meet any of the Project objectives, as identified above.

6.4.4 “REDUCED DENSITY” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The “Reduced Density” Alternative assumes development of the Project site similar to the proposed Project. The townhomes would remain unchanged; however, for purposes of this Alternative, the apartment building would be reduced to 192 DUs (from 328) and the building height would be reduced to five stories (from seven stories). This Alternative proposes a total of 267 DU, or approximately 34 percent fewer DU than the Project, and would reduce the density to 51 DU/AC. However, with fewer units, the Applicant would not be able to provide the affordable housing. It is assumed that the access driveways would be the same under this Alternative, thus, similarly to the Project, this Alternative would require offsite railroad improvements pursuant to CPUC standards and UPRR guidelines. **Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative** compares development under the Project and the Reduced Density Alternative.

Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative

Description	Apartment Building (DU) ¹	Townhomes (DU) ¹	Density (DU/AC)	Height of Building (Stories)	Floor Area (SF)
Proposed Project	328	75	77	7	429,000
Reduced Density Alternative	192	75	51	5	253,110
<i>Subtotal Difference</i>	-136	-0			
<i>Total Difference</i>	-136			-2	-175,890
<i>% Difference</i>	-34%				-41%

Note: DU = dwelling units; and AC = acre.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

The Project’s short-term air quality impacts from demolition, grading, and construction activities would be less than significant. The Reduced Density Alternative proposes approximately 34 percent fewer DU than the Project and less floor area (approximately 253,110 SF compared to



approximately 429,000 SF), thus, proportionately fewer construction emissions as presented in **Table 4.1-5** would occur. This Alternative would also not expose sensitive receptors to substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework.

As shown in **Table 4.1-6**, the Project's operational criteria pollutant emissions would be below the SCAQMD's mass daily significance thresholds and would result in a less than significant air quality impact. Under the Reduced Density Alternative, proportionately less operational emissions would occur compared to the Project, as there would be fewer DUs developed. Therefore, like the Project, less than significant operational emissions would occur.

The Reduced Density Alternative would result in less impacts than the proposed Project regarding air quality. Less short-term construction emissions and long-term operational emissions would occur than the Project, as fewer DU would be developed.

Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated. The Project's potential to disturb as yet undiscovered human remains was concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated. The Reduced Density Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur, with mitigation incorporated.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding cultural resources since the ground disturbing activities would occur within a similar footprint.

Energy

As shown in **Table 4.3-5**, the Project would result in construction-related energy consumption from water, diesel fuel, and gasoline usage. However, the Project would result in less than significant impacts concerning construction-related energy consumption since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the Reduced Density Alternative, less construction-related energy consumption would occur, given this Alternative proposes approximately 34 percent fewer DU. Further, this Alternative would also be subject to compliance with Title 24 requirements. Like the Project, this Alternative's construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy.

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use; see **Table 4.3-5**. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant



impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the Reduced Density Alternative, operational energy consumption would be proportionately less as the Project, as fewer DU would be developed, but this Alternative would also operate under the latest CALGreen standards. Like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations, resulting in a less than significant impact concerning energy.

The Reduced Density Alternative would result in less energy consumption than the proposed Project. Notwithstanding, like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in less than significant impacts concerning energy.

Geology, Soils, and Paleontological Resources

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. Since the Reduced Density Alternative would involve demolition and ground disturbing construction activities in a similar footprint, similar impacts would occur as the Project, with mitigation incorporated.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding paleontological resources. Under this Alternative, ground disturbing activities would occur within a similar footprint as the Project.

Greenhouse Gas Emissions

The Project would result in less than significant construction-related GHG emissions and direct and indirect operational GHG emissions, as explained in **Section 4.5**. Under the Reduced Density Alternative, less construction-related GHG emissions would occur than with the Project because fewer DU would be constructed.

The Reduced Density Alternative would result in less GHG emissions than the proposed Project since fewer DU would be developed. Notwithstanding, like the Project, GHG emissions would not exceed significance thresholds, thus would be less than significant under this Alternative.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant. The Reduced Density Alternative would also involve construction activities, thus this Alternative, like the Project, would result in a less than significant impact with mitigation incorporated.



The Project's operational-related impacts concerning PCE concentrations that exceed DTSC screening levels for residential applications, which was considered less than significant with mitigation incorporated, would be similar with this Alternative, as residential uses are also proposed.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding hazards and hazardous materials, because like the Project, this Alternative proposes development of residential uses within a similar footprint.

Hydrology and Water Quality

Like the Project, the Reduced Density Alternative construction activities would result in less than significant short-term water quality impacts following compliance with NPDES and GMC requirements. However, this Alternative's impacts would be less than the Project's since this Alternative proposes less floor area.

Following compliance with NPDES and GMC requirements, which include implementation of water quality BMPs, the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Similarly, the Reduced Density Alternative would result in less than significant operational water quality impacts following compliance with current NPDES and GMC requirements. As such, this Alternative is assumed to result in similar operational water quality impacts as the Project.

The Project would not impede or redirect flood flows and would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. This Alternative would also decrease the site's impervious surface coverage similar to the Project, as this Alternative proposes a similar site plan but only five stories of apartments, rather than seven. Like the Project, this Alternative would not impede or redirect flood flows or modify peak flow rates, since a no net increase of flows would be expected. Also, similar to the Project, this Alternative would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. The Project's potential construction-related impacts to groundwater would be less than significant with mitigation incorporated. The Project would decrease potential impacts to groundwater resources through a decrease in impervious surfaces and increase in infiltration of stormwater runoff. Given similar development footprints and impervious surfaces, this Alternative would also result in less than significant impacts with mitigation incorporated. As with the Project, this Alternative's impacts concerning demand for groundwater supplies would be less than significant. The Reduced Density Alternative would have a similar footprint as the Project and would therefore have a similarly sized area devoted to pervious surfaces, and therefore increased levels of groundwater infiltration. The Reduced Density Alternative would result in similar impacts as the proposed Project regarding hydrology and water quality, since the same reductions to runoff, impervious surface, and improvements to water quality during operations would occur.



Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations with Specific Plan, and Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, and Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6**. The Reduced Density Alternative assumes similar entitlements and development as the Project; however, this Alternative proposes 136 fewer DU, as indicated in **Table 6-2**. Comparatively, this Alternative proposes approximately 34 percent fewer DU. The Project was concluded to be consistent with the GGP policies and plans and GMC standards. This Alternative would similarly be consistent with GGP policies and plans and GMC standards. The Reduced Density Alternative's impacts involving land use consistency would be similar to the Project, as the same land use type would be developed.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding land use and planning. The same use would occur on the Project site and be similarly consistent with the GGP policies and plans and GMC standards.

Noise

The Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning construction equipment and a temporary noise barrier, based on exceedance of noise standards, the proposed building height (seven stories), and extended construction period. The Project's construction-related vibration impacts would be less than significant with mitigation. Although the Reduced Density Alternative's construction activities would occur over a shorter time period, involve less building height, and approximately 41 percent fewer square feet, construction activities would take place within a similar footprint and distance from sensitive receptors, and thus will also exceed noise standards. Therefore, like the Project, this Alternative would still result in a significant unavoidable impact concerning construction noise, but to a slightly lesser degree than the Project.

As shown in **Table 4.9-11**, the Project's composite stationary source noise level would be below the significance thresholds, resulting in a less than significant impact. The Reduced Density Alternative would have similar noise sources as the Project, but slightly less impacts would occur since this Alternative proposes 34 percent fewer DU.

The Project would result in less than significant impacts from mobile noise sources. This Alternative would also be anticipated to result in less than significant impacts from mobile noise sources, however, proportionately less than the Project as this Alternative would generate fewer trips. The Reduced Density Alternative would result in slightly less impacts than the proposed



Project regarding noise, given less construction and operational noise would occur compared to the Project, although the Project's significant unavoidable construction impacts would also occur under this Alternative.

Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. Under this Alternative, population growth would be approximately 34 percent less, as 136 fewer DUs would be constructed. And due to economies of scale, this Alternative would not be able to provide any affordable units. As with the proposed Project, this Alternative would induce unplanned population growth, but it would not be significant. Like the Project, this Alternative would not displace existing housing.

The 2021-2029 Housing Element Update identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation.

Under this Alternative, 136 fewer DUs would be constructed, and no affordable housing units would be provided. Thus, this Alternative would be in furtherance of meeting the City's RHNA allocation, however, to a lesser degree than the Project. However, Housing Elements include a housing buffer in the site inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's provision of fewer housing units and no affordable units would not preclude the City from meeting their RHNA obligation and the findings under Government Code §65863 can be made.

The Reduced Density Alternative would result in greater impacts than the proposed Project regarding population and housing, as this Alternative would be in furtherance of the City's efforts to meet the 6th Cycle RHNA allocation, but to a much lesser degree than the Project given this Alternative would provide fewer above-market rate units and exclude the affordable units.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact. Like the proposed Project, this Alternative would incrementally increase demands on fire and police protection services, and library facilities, but to a lesser degree than the Project given fewer DUs would be developed. Notwithstanding, neither this



Alternative nor the Project would result in a significant impact concerning fire and police protection services, or library facilities as neither would result in an adverse physical impact associated with the provision of new or physically altered facilities.

The Project is forecast to generate a student population growth of approximately 151 students at the LAUSD, which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The Reduced Density Alternative would involve approximately 34 percent fewer DU, with proportionately less student population increase and demand for school facilities as the Project. Like the Project, payment of school impact fees would fully mitigate potential impacts and no physical impacts concerning school facilities would occur.

The Reduced Density Alternative would result in less demand for public services, as the Project since fewer DUs would be constructed. But, like the Project, would not result in an adverse physical impact associated with the provision of new or physically altered facilities.

Recreation

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but it would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Under the Reduced Density Alternative, fewer DUs would be developed, but it would also incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, although to a lesser degree than the Project. Neither the Alternative nor the proposed Project would result in an adverse physical impact associated with the construction or expansion of recreational facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project proposes onsite open space and recreational amenities, which would result in a less than significant physical effects on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would occur also with this Alternative, as recreational uses would also be developed.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding recreational facilities, although slightly less demand for recreational facilities would occur. Like the Project, less than significant physical effects on the environment would occur with mitigation incorporated from open space and recreational amenities.

Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Reduced Density Alternative proposes a similar residential development; therefore, it would also not



conflict with a program, plan, ordinance, or policy addressing the circulation system and would result in less than significant impacts.

The Project is located within a low VMT generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. This Alternative is on the same site, thus, would also be screened from further VMT, resulting in a less than significant impact concerning VMT.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. The Reduced Density Alternative would involve similar construction activities and it would be required to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access, similar to the Project. Assuming similar traffic management measures are implemented as a part of this Alternative's construction, less than significant impacts would also occur.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding transportation. This Alternative would also be within a Low VTM generating area and would minimize potential circulation impacts through traffic management measures.

Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. The Reduced Density Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur with mitigation incorporated.

The Reduced Density Alternative would be result in similar impacts as the proposed Project regarding tribal cultural resources. Under this Alternative, ground disturbing activities would occur within the same footprint as the Project.

Utilities and Service Systems

As shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9**, Project operations would increase wastewater generation, electricity demand, and water demand, but would decrease solid waste generation. Thus, the Project would require construction of new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. Notwithstanding, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed utilities and service systems. The Reduced Density Alternative would result in an overall increase in wastewater generation,



electricity demand, and water demand, but proportionately less than the Project since this Alternative would propose 34 percent fewer DUs.

The Reduced Density Alternative would result in less demands concerning utilities and service systems than the Project, but similar impacts concerning environmental effects associated with construction of the proposed utilities and service systems.

Aesthetics

The Project proposes a 403-unit apartment building and 75 townhomes. The maximum height of the apartment building and townhomes would be seven stories and three stories, respectively. Under this Alternative, the site's visual character/quality would be altered similar to the Project since the existing industrial use would be removed and replaced with residential uses (a 192 DU apartment building and 75 townhomes). With this Alternative, the apartment building would be only five stories, thus, shorter than the Project.

The Project would not result in a significant source of light or glare. This Alternative proposes 136 fewer DU, thus aesthetic impacts from light and glare would be proportionately less under this Alternative compared to the Project. As with the Project, this Alternative would result in less than significant light and glare impacts.

The Reduced Density Alternative would result in less impacts than the proposed Project regarding aesthetics/light and glare. This Alternative proposes fewer DUs and fewer stories, thus, proportionately less visual alteration would occur than the Project. Like the Project, impacts would be less than significant under this Alternative.

ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Density Alternative would fulfill most of the Project objectives but would not provide as much housing and would fail to provide any affordable housing. This Alternative would not provide as much diversity for Gardena's existing multi-family housing options, but would still support the expanding technology and creative sector with newly constructed high-quality housing opportunities, cluster urban residential development near technology firms and large employment centers, establish housing development that meets high standards of design and pursues environmental sustainability, and redevelop a blighted site while increasing tax revenues to the City and supporting the City's above-market rate RHNA goals. However, because this Alternative proposes 136 fewer DUs (41 percent fewer apartments, 34 percent fewer overall DU) than the Project, this Alternative would not accomplish these objectives to the same degree as the Project. In addition, the tax revenues to the City would be proportionately reduced and the City's RHNA goals would be supported to a lesser degree. This Alternative would not avoid the Project's unavoidable significant impact of construction-related noise impacts but would slightly lessen the construction noise impact given a reduced construction period and reduced building height.



6.5 ALTERNATIVES CONSIDERED, BUT REJECTED

In accordance with State CEQA Guidelines §15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

In addition to the three alternatives analyzed above, an "Avoid Construction Noise Impact" Alternative was considered but rejected. The "Avoid Construction Noise Impact" Alternative would reduce the Project size and density to avoid the Project's significant unavoidable construction noise impact.

To avoid the Project's significant and unavoidable construction-related noise impact, analysts considered noise during construction phases and whether these noise levels could be reduced by reducing the development footprint under the Avoid Noise Impact Alternative. As indicated in **Table 4.9-6: Estimated Construction Noise Levels**, the Project's estimated construction noise levels would exceed the City's significance thresholds at all noise-sensitive receptor locations except R3 despite incorporation of mitigation achieving an approximately 12-dBA attenuation (i.e., noise reduction). Further, the City's significance thresholds are exceeded for all noise-sensitive receptor locations except R3 during every phase of construction, including demolition. Accordingly, unless demolition is avoided (and the existing structures remain), no modification of the Project would avoid the Project's significant unavoidable construction noise impacts. Therefore, the Avoid Construction Noise Impact Alternative was rejected because, to avoid the Project's significant unavoidable construction noise impact, demolition would have to be completely avoided. Thus, it would not be practical and would not accomplish the Project's objectives.

An "Alternative Site" Alternative was also considered but rejected given that the Applicant does not have interest in any alternative site within the City that is currently not already being developed.

6.6 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

According to State CEQA Guidelines §15126.6(e)(2), "*No Project*" Alternative, "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." **Table 6-3** summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project). As indicated in **Table 6-3**, the environmentally superior Alternative is the No Project/No Construction Alternative. Among the other Alternatives, the Reduced Density Alternative is the environmentally superior Alternative. As shown in **Table 6-3**, it would result in similar or less impacts for all resources areas except population and housing, for which it would result in greater impacts than the Project. However, this Alternative would not eliminate the only unavoidable



significant impact of construction noise and would not achieve the objectives to the same degree as the proposed Project.



Table 6-3: Comparison of Alternatives

Sections	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density
Air Quality	∨	∨	∨
Cultural Resources	∨	=	=
Energy	⤴	∨	∨
Paleontological Resources	∨	=	=
Greenhouse Gas Emissions	∨	∨	∨
Hazards & Hazardous Materials	∨	⤴	=
Hydrology & Water Quality	⤴	⤴	=
Land Use & Planning	∨	∨	=
Noise*	∨	⤴ **	∨ **
Population & Housing	⤴	⤴	⤴
Public Services	∨	=	∨
Recreation	∨	∨	=
Transportation	∨	∨	=
Tribal Cultural Resources	∨	=	=
Utilities & Service Systems	∨	=	=
Aesthetics	⤴	∨	∨
<p>⤴ Indicates an impact that is greater than the proposed Project (environmentally inferior). ∨ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). ** Impact would still be significant and unavoidable.</p>			



Table 6-4: Alternatives Ability to Meet Project Objectives

Would the Alternative:	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density
Diversify the City of Gardena’s existing housing options, by providing a range of housing types and sizes, to serve the region’s growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies?	No	No	Yes – but to a lesser degree
Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work?	No	No	Yes – but to a lesser degree
Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles?	No	No	Yes – but to a lesser degree
Establish housing development that meets high standards of design and pursues environmental sustainability?	No	No	Yes
Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City’s Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.	No	No	Partially, it would not provide affordable housing.



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An architectural rendering of a modern, multi-story apartment building. The building features a mix of light-colored facades and dark window frames. A central courtyard contains a rectangular swimming pool with a wooden deck, surrounded by lounge chairs and a glass safety fence. The pool area is enclosed by a dark metal railing. In the foreground, there are several rooftop terraces with wooden decking and some greenery. The overall scene is bright and clear, suggesting a sunny day.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT



7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA provides that an EIR shall focus on a project's significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. The environmental topics dismissed in an Initial Study (Environmental Checklist) as clearly not significant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the Environmental Checklist findings is subsequently received.

California Public Resources Code (PRC) §21100 (c) states that an EIR shall contain a statement briefly indicating the reasons that a project's various possible significant effects were determined not to be significant and were, therefore, not discussed in detail in the Draft EIR (PRC §21000 et. seq.). State CEQA Guidelines §15128 adds, "Such a statement may be contained in an attached copy of an Initial Study (Environmental Checklist)" (14 CCR 15000 et. seq.). The environmental topics included in the Initial Study (Environmental Checklist) prepared with the Notice of Preparation (NOP) included a determination of potential impact significance. The Draft EIR further evaluates all of the Project's possible significant effects in accordance with the State CEQA Guidelines. Where the Initial Study (Environmental Checklist) determined the Project would have a "less than significant impact" or "no impact," these threshold issues have not been addressed in the EIR, except to be listed in this section. The Initial Study (Environmental Checklist) thresholds are provided below followed by an explanation supported by cited information sources of all "no impact" and "less than significant impact" responses. The sequence and numbering of the below thresholds are consistent with the sequence and numbering provided in the Initial Study (Environmental Checklist); see **Appendix 1.0-1: Initial Study, Notice of Preparation, and Comments Letters**.

7.1 AESTHETICS

7.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. No such conditions exist on or near the Project site. Additionally, the GGP does not specifically address scenic vistas. Therefore, the Project would not have an adverse effect on a scenic vista.

7.1b Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. The area surrounding the Project site is predominately developed, with no natural landforms or scenic features present. There are no State- or County-designated scenic highways



in the Project site vicinity.¹ Therefore, the Project would not damage scenic resources within a State scenic highway.

7.2 AGRICULTURE AND FORESTRY RESOURCES

- 7.2a *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- 7.2b *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- 7.2c *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?*
- 7.2d *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- 7.2e *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

No Impact. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the City.² Further, the Project site is not the subject of a Williamson Act Contract.³ The Project site is zoned M-1, M-2, and HO-4.⁴ No agricultural, forest land, or timberland zoning exists in the City. Therefore, the Project would result in no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning.

The Project site is fully developed with approximately 106,100 SF of industrial land uses. No farmland, forest land, or timberland exist in the City. Therefore, the Project would not result in the conversion or loss of Farmland, forest land or timberland.

¹ California Department of Transportation. (2019). *California State Scenic Highway System Map*. Retrieved from <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

² California Department of Conservation. (2016). *California Important Farmland Finder*. Retrieved from <https://maps.conservation.ca.gov/dlrp/ciff/>.

³ California Department of Conservation. (2016). *Williamson Act/Land Conservation Act*. Retrieved from <http://www.conservation.ca.gov/dlrp/lca>.

⁴ City of Gardena. (2020). *Zoning Map*. Gardena, CA: City of Gardena Planning Division. Retrieved from https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zoning_2020.pdf.



7.3 BIOLOGICAL RESOURCES

- 7.3a *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- 7.3b *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- 7.3c *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. The Project site is fully developed with approximately 106,100 SF of industrial land uses. No natural habitats are present on-site, with only landscaping (i.e., ornamental vegetation) present. The Project site is bordered by single- and multi-family residential uses. No natural habitats are present within these adjacent areas, with only landscaping (i.e., ornamental vegetation) present. Based on review of the existing and adjacent site conditions, no candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands are present on or adjacent to the Project site. The nearest wetlands to the Project site are the Gardena Willows Wetland Preserve, which is approximately 0.5 mile from the Project site, at 1202 West 170th Street in the City of Gardena. Therefore, the Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands.

- 7.3d *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Less Than Significant Impact. Corridors are linear linkages between two or more habitat patches, which provide for wildlife movement and dispersal. The Project site is fully developed and contains no natural habitats, with only minimal landscaping. The Project site is also bounded by single- and multi- family residential uses on all sides. No natural habitats are present on these adjacent areas, and only landscaping (i.e., ornamental vegetation) is present.

The Dominguez Channel is located 0.4 mile south of the Project site. There are no established wildlife movement corridors that traverse this segment of the Dominguez Channel.⁵ Because this drainage is concrete lined, its habitat values in this urban area are low. The Channel does not necessarily include habitat capable of supporting all requirements of a species, but it could be

⁵ Environmental Sciences Associates, *LA County Flood Control District Enhanced Watershed Management Programs Draft Program Environmental Impact Report*, January 2015.



used for wildlife movement. However, because Project construction activities would occur entirely within Project site boundaries and would be restricted to daytime hours, in accordance with the GMC, the Project's potential impacts concerning interference with an established wildlife movement would be less than significant.

As previously noted, the Project site is fully developed and contains only ornamental vegetation, no natural habitats, with only landscaping. The on-site vegetation and trees could provide suitable nesting habitat for birds. The Project would clear and grade the Project site including the vegetation with the potential to support nesting migratory birds. The Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF) are intended to protect migratory birds. 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 CFGF extends protection to non-migratory birds identified as resident game birds (CFGF §3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGF §3503). To address potential impacts to migratory birds from construction activities during the nesting season, the Project would be subject to compliance with GMC §18.42.210E: Migratory Bird Protection,⁶ which includes provisions concerning construction activities both within and outside the nesting season to avoid effects to migratory birds. Therefore, following compliance with the relevant regulatory framework (MBTA, CFGF, and GMC §18.42.210E), the Project's potential impacts to nesting migratory birds would be mitigated to a less than significant level.

7.3e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. GMC §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 in the City. The Project would be developed on private property and no tree trimming or tree removal within any of the City's streets or public places would occur as a result of Project construction. Therefore, the Project would not conflict with GMC §13.60.080.

7.3f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. 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

⁶ City of Gardena, California, Municipal Code Ordinance No. 1848. Retrieved from <https://cityofgardena.org/wp-content/uploads/2023/03/ORD-NO-1848-Establishment-of-Housing-Overlays-and-Development-Standards.pdf>.



state habitat conservation plan. Therefore, the Project would not result in conflicts with such plans. No impact would occur.

7.4 GEOLOGY AND SOILS

7.4ai Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. 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 (AP) 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). The Project site is not located within an Alquist-Priolo Earthquake Fault Zone.⁷ Additionally, the potential for surface fault rupture at the Project site during the design life of onsite structures is considered low.⁸ The Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. Therefore, no impact would occur in this regard.

7.4aii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The City is located between several active fault zones including the Newport-Inglewood-Rose Canyon Fault Zone, Palos Verdes Fault, and Compton Blind Thrust Fault.⁹ The zoned fault nearest the Project site is the Newport-Inglewood Fault Zone, located approximately 0.6 miles to the west. The Project site is in an area of high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The region has experienced shaking from several earthquakes recorded back to 1812. The nearest large historic earthquake is the 1994 Northridge Earthquake, with an epicenter approximately 33.6 miles northwest of the Project site.¹⁰ Historic earthquakes with magnitudes of greater than or equal to 6.0 and have been epicentered within approximately 30 miles of the Project site.

⁷ California Department of Conservation. (2015). Earthquake Zones of Required Investigation Inglewood Quadrangle. Retrieved from http://gmw.consrv.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf.

⁸ Hamilton & Associates. (2022). *Preliminary Geotechnical Investigation*. page 8.

⁹ *Ibid.*, page 7-6.

¹⁰ Southern California Earthquake Data Center. (2019). Significant Earthquakes and Faults. Retrieved from <https://scedc.caltech.edu/significant/index.html>.



The faults described above could cause moderate to intense ground shaking during the Project's lifetime. Additionally, the Project site has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. Therefore, Project implementation could expose people and structures to potential adverse effects involving 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. Regulatory controls to address potential seismic hazards would be imposed on the Project through the permitting process. Pursuant to GMC Chapter 15.04: General Building Provisions, the City has adopted the 2022 California Building Standards Code (CBSC), subject to certain amendments and changes, including those that address seismic resistance. CBSC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the most recently published CBSC (as amended by GMC Chapter 15.04), which specifies design requirements to mitigate the effects of potential earthquake hazards. Moreover, the Gardena Building Services Division will review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's¹¹ recommendations for Project design and construction, including concerning seismic design parameters. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Preliminary Geotechnical Investigation's recommendations, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant.

7.4a.iii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving 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. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The State's Seismic Hazards Maps¹² do not classify the Project site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. Additionally, onsite soils consist predominantly of very stiff fine-grained soils (clays and silts), with one layer of borderline stiff to very stiff fine-grained soil, and occasional layers or lenses of dense sands. Deeper soils are mostly

¹¹ Hamilton & Associates. (2022). *Preliminary Geotechnical Investigation*; Appendix 4.4-1: Preliminary Geotechnical Investigation.

¹² California Department of Conservation. Seismic Hazard Zones, Map Data Viewer. Retrieved from [Maps and Data \(ca.gov\)](https://mapsanddata.ca.gov/).



very stiff fine-grained soils with dense to very dense sand layers or lenses. Liquefaction potential of these soil types is characteristically nil to low.¹³ Analysis was also performed to evaluate potential seismically induced settlement of onsite earth materials during a seismic event, considering historic high groundwater depth of approximately 15 feet below existing grade. Results of the liquefaction analysis further support that liquefaction potential at the site is considered nil to low;¹⁴ see Appendix B of **Appendix 1.0-1**. Therefore, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving liquefaction would be less than significant. Further, as discussed in Response 4.7aii, the Gardena Building Services Division will review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's recommendations for Project design and construction.

7.4aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving 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 California Geological Survey's Earthquake Zones of Required Investigation Inglewood Quadrangle Map, the Project site does not lie in a landslide hazard zone.¹⁵ Since the site is relatively flat and not within a landslide hazard zone, no potential for earthquake-induced land sliding would occur. Therefore, the Project would not directly or indirectly cause potential adverse effects involving landslides. No impact would occur in this regard.

7.4b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project site is relatively flat, and its geology is composed of fill materials and native alluvial soils. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with the GMC §8.70.110.B.1: Development Construction, erosion and siltation control measures and the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit); see also Response 4.9a. GMC §8.70.110.B.1 specifies that no Grading Permit shall be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board. Following compliance with the established regulatory framework (i.e., the GMC and Construction General Permit), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant.

¹³ Hamilton & Associates. (2022). *Preliminary Geotechnical Investigation*; **Appendix 4.4-1**.

¹⁴ Ibid.

¹⁵ Ibid.



- 7.4c *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- 7.4d *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact. The Project site would not be subject to seismically induced liquefaction or lateral spreading (see Response 4.7aⁱⁱⁱ) or landslides (see Response 4.7a^{iv}). The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's recommendations, including those concerning expansive soils. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Preliminary Geotechnical Investigation's recommendations, the Project would not create substantial direct or indirect risks to life or property concerning expansive soils. Therefore, impacts would be less than significant in this regard.

- 7.4e *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. Sewers would be available for disposal of Project-generated wastewater; see Responses 4.19aⁱⁱ and 4.19aⁱⁱⁱ. The Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur in this regard.

7.5 HAZARDS AND HAZARDOUS MATERIALS

- 7.5a *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less Than Significant Impact. Project construction would involve the routine transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. Examples of such activities include fueling and servicing construction equipment and applying paints and other coatings.

The Project proposes a residential development, which is not anticipated to involve the routine transport, use, or disposal of large quantities of hazardous materials that could create a significant hazard to the public or environment. The maintenance materials would be stored, handled, and disposed of in accordance with applicable regulations and the City's programs to control and safely dispose of hazardous materials and wastes. Specifically, the City's Hazardous Materials Release Response Plans and Inventory Program requires the owner or operator of any business that handles or stores hazardous materials equal to or above the reportable quantities to submit a Hazardous Materials Inventory and Contingency Plan. Compliance with these regulations would ensure that all hazardous wastes would be properly handled, recycled, treated, stored, and disposed.



Therefore, following compliance with standard City practices and federal and State regulations, the Project would result in a less than significant impact concerning its potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

7.5c 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 school nearest the Project site, Peary Middle School, is at 1415 West Gardena Boulevard, City of Gardena, which is approximately 0.4 mile north of the Project site. Therefore, the Project site is more than 0.25 mile from this existing school. Notwithstanding, the routine transport, use, and disposal of hazardous materials during Project construction would be subject to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure Project construction activities would not create a significant hazard to nearby schools.

Additionally, the Project does not propose any uses which could generate hazardous emissions or involve the handling of hazardous materials, substances, or waste in significant quantities that could impact surrounding schools. The types of hazardous materials that would be routinely handled during Project operations would be limited to household cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. The routine transport, use, and disposal of hazardous materials during operations would be subject to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure Project operations would not create a significant hazard to nearby schools.

7.5d Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks (USTs) having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.¹⁶ Therefore, the Project would result in no impact in this regard.

¹⁶ California Department of Toxic Substances Control. *Department of Toxic Substances Control EnviroStor*. Retrieved from: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&report_title=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29, accessed November 2023.



7.5e *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field (“Airport”), approximately 3.4 miles to the northwest. This Airport is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. No impact would occur in this regard.

7.5f *Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. The Project Site is located in an urbanized area where adequate circulation and access are provided to facilitate emergency response. The Gardena Public Safety Plan ¹⁷ outlines emergency response actions in the event of a large-scale disaster, such as a hazardous materials emergency. Further, while Project construction would likely require traffic lane, parking lane, and/or sidewalk closures, it would not require the complete closure of any public or private street. The Project would implement PDF TR-1 (see **Section 4.13: Transportation**), which requires a Construction Traffic Management Plan, approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. Further, Project construction would be subject to compliance with the following Public Safety Plan Policies:

- **PS 1.7: Development Review.** Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.
- **PS 2.2: Building and Fire Codes.** Require that all buildings and facilities within Gardena comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards.
- **PS 2.7: New Development.** Require adequate fire protection services, fire protection plans, and emergency vehicle access for new development. Locate, design, and construct new development to minimize the risk of structural loss from fires.
- **PS 3.1: California Building Code.** Require compliance with seismic safety standards in the California Building Code, as adopted and amended.

¹⁷ City of Gardena. (2022). Public Safety Plan. Retrieved from https://cityofgardena.org/wp-content/uploads/2022/04/Gardena_Public-Safety-Element_FINAL-FOR-ADOPTION.pdf.



Therefore, following compliance with City policies, as specified above, the Project's potential impacts concerning impairing implementation of or physically interfering with an emergency response plan or related policies would be less than significant.

4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project site is in a fully urbanized area, and it is not adjacent to any wildland. Therefore, the Project would not expose people or structures to a risk involving wildland fires. No impact would occur in this regard.

7.6 HYDROLOGY AND WATER QUALITY

7.6d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map (FIRM) indicates the Project Site is within Zone X, which depicts areas determined to be outside of the 0.2-1.0% (500-year) annual chance floodplain.¹⁸

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, which can occur in response to ground shaking. The Project site is approximately eight miles east of the Pacific Ocean and there are no nearby bodies of standing water. Therefore, the Project site is not within a tsunami or seiche zone.

The Project proposes a residential development that would involve the use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. The Project is not within a flood hazard, tsunami, or seiche zone. Therefore, no risk of release of pollutants due to Project inundation by these hazards would occur.

7.7 LAND USE AND PLANNING

7.7a Would the project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The Project proposes residential infill development. The Project replaces the existing industrial use and does not propose any new roadways or other physical barriers. Given its nature and scope, the Project would not physically divide an established community. No impact would occur in this regard.

¹⁸ Federal Emergency Management Agency. (April 2019). *FEMA Flood Map Service Center*. Retrieved from <https://msc.fema.gov/portal/search?AddressQuery=1515%20W%20178th%20St%2C%20Gardena%2C%20CA%2090248#searchresultsanchor>.



7.8 MINERAL RESOURCES

7.8a *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

7.8b *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

No Impact. The 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.¹⁹ The Project site is located in Mineral Resource Zone-1 (MRZ-1). Areas designated MRZ-1 are noted to have adequate information that no significant²⁰ mineral deposits are present, or it is judged that little likelihood exists for their presence.²¹ Further, the GGP does not identify the Project site as a locally important mineral resource recovery site. Therefore, the proposed Project would have no impact concerning mineral resources.

7.9 NOISE

7.9c *Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?*

No Impact. The Project site is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field ("Airport"), approximately 3.4 miles to the northwest. This Airport is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. Therefore, the Project would not expose people residing or working in the Project area to excessive airstrip- or airport-related noise levels. No impact would occur in this regard.

7.10 POPULATION AND HOUSING

7.10a *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The Project would remove the existing onsite industrial uses and, in their place, construct residential uses. The Project would not displace existing housing or people or require construction of replacement housing elsewhere. Therefore, no impact would occur in this regard.

¹⁹ California Department of Conservation. (2018). *California Statutes and Regulations for the California Geological Survey*. Sacramento, CA: California Geological Survey.

²⁰ Note that use of the term "significant" in this context is used in the MRZ definitions of zones to describe economic value of mineral resources and does not refer to a level of impact under CEQA.

²¹ California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps. Special Report 143, Plate 4-1*. Retrieved from <http://maps.conservation.ca.gov/cgs/informationwarehouse/>.



7.11 WILDFIRE

- 7.11a *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- 7.11b *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- 7.11c *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- 7.11d *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No Impact. The Project site is in a local responsibility area and classified as Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ).²² Because the Project is not located in or near a State responsibility area or lands classified as VHFHZ, the Project would result in no impact concerning wildfire.

²² CalFire. (September 2011). *Los Angeles County FHSZ Map*. Retrieved from <https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf>.



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8.0 LIST OF PREPARERS





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