

COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING

BRIDGE POINT SOUTH BAY II

PROJECT No. R2017-004820

CASE No. RPPL2017010467

6TH SCREENCHECK DRAFT INITIAL STUDY

Prepared for:

COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING
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SEPTEMBER 18, 2019

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Table of Contents	Page
Environmental Checklist Form	7
Environmental Factors Potentially Affected	39
Evaluation of Environmental Impacts	40
1. Aesthetics.....	41
2. Agriculture / Forest.....	48
3. Air Quality	50
4. Biological Resources	72
5. Cultural Resources	76
6. Energy.....	80
7. Geology and Soils.....	88
8. Greenhouse Gas Emissions.....	93
9. Hazards and Hazardous Materials	108
10. Hydrology and Water Quality.....	124
11. Land Use and Planning.....	132
12. Mineral Resources.....	134
13. Noise.....	135
14. Population and Housing.....	153
15. Public Services	155
16. Recreation.....	159
17. Transportation/Traffic	160
18. Tribal Cultural Resources	183
19. Utilities and Service Systems	186
20. Wildfire.....	193
21. Mandatory Findings of Significance	194

Appendices

Appendix A: Lighting Plan and Shadow Analysis

Appendix B: Air Quality, Greenhouse Gas, and Health Risk Assessment

Appendix C: Cultural Records Search and Historic Resources Assessment

Appendix D: Conceptual Grading Plan

Appendix E: Geotechnical and Infiltration Testing Reports

Appendix F: Phase I Environmental Site Assessment

Appendix G: Data Evaluation and Human Health Risk Assessment

Appendix H: U.S. EPA Settlement Agreement, Concurrence, and Public Responses

Appendix I: Soil Management Plan

Appendix J: Hydrology Study

Appendix K: Low Impact Development Plan and Stormwater Pollution Prevention Plan

Appendix L: Noise Impact Analysis

Appendix M: Traffic Impact Analysis

Tables

Table 1 – Approximate Construction Phasing, Duration and Activity Levels	10
Table 3-1 – SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance	51
Table 3-2 – SCAQMD Local Air Quality Thresholds of Significance	51
Table 3-3 – Construction-Related Regional Criteria Pollutant Emissions	54
Table 3-4 – Construction-Related Local Criteria Pollutant Emissions – Prior to Mitigation	56
Table 3-5 – Mitigated Construction-Related Local Criteria Pollutant Emissions.....	57
Table 3-6 – Operational Regional Criteria Pollutant Emissions	59
Table 3-7 – Operations-Related Local Criteria Pollutant Emissions	60
Table 3-8 – TAC Cancer Risks at Nearby Sensitive Receptors.....	68
Table 6-1 – Electricity Consumption in Los Angeles County 2007-2016	82
Table 6-2 – Natural Gas Consumption in Los Angeles County 2007-2016.....	83
Table 6-3 – Automotive Fuel Consumption in Los Angeles County 2007-2017.....	83
Table 6-4 – Energy Consumption	84
Table 8-1 – Project-Related Annual Greenhouse Gas Emissions.....	96
Table 8-2 – Project Compliance with Los Angeles County Climate Action Plan.....	98
Table 8-3 – Project Consistency with 2016-2040 RTP/SCS.....	105
Table 9-1 – Maximum Concentrations of Contaminants Detected in Soil and Regulatory Screening Levels	115
Table 9-2 – Maximum Concentrations of Contaminants Detected in Soil Gas and Regulatory Screening Levels	116
Table 9-3 – Environmental Database Search Results for Project Site.....	120
Table 13-1 – Worst-Case Mobile Construction Noise Levels at Nearest Receptors Prior to Mitigation.....	137
Table 13-2 – Mitigated Worst-Case Mobile Construction Noise Levels at Nearest Homes	138
Table 13-3 – Worst-Case Stationary Construction Noise Levels at Nearest Homes Prior to Mitigation	139
Table 13-4 – Mitigated Worst-Case Stationary Construction Noise Levels at Nearest Homes	139
Table 13-5 – Operational Noise Levels from Onsite Sources at the Nearby Homes, Assuming 1/3 of Truck Trips During Nighttime Hours.....	142
Table 13-6 – Operational Noise Levels from Onsite Sources at the Nearby Homes, Assuming 2/3 of Truck Trips During Nighttime Hours.....	145
Table 13-7 – Vibration Source Levels for Construction Equipment.....	146
Table 13-8 – Existing Year Project Traffic Noise Contributions	148
Table 13-9 – Cumulative Project Traffic Noise Contributions.....	148

Table 13-10 – Existing Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 1/3 Nighttime Truck Trips.....	150
Table 13-11 – Cumulative Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 1/3 Nighttime Truck Trips.....	150
Table 13-12 – Existing Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 2/3 Nighttime Truck Trips.....	151
Table 13-13 – Cumulative Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 2/3 Nighttime Truck Trips.....	151
Table 17-1 – Intersections and Freeway Facilities Level of Service Criteria.....	163
Table 17-2 – Project Trip Generation.....	165
Table 17-3 – Existing and Existing Plus Project Levels of Service (LA County).....	169
Table 17-4 – Existing and Existing Plus Project plus Cumulative Levels of Service (LA County)	170
Table 17-5 – Existing and Existing Plus Project Plus Cumulative with Improvements Levels of Service (LA County)	172
Table 17-6 – Existing and Existing Plus Project Levels of Service (LADOT).....	174
Table 17-7 – Cumulative and Cumulative Plus Project Levels of Service (LADOT)	174
Table 17-8 – Existing and Existing Plus Project Levels of Service (Carson)	175
Table 17-9 – Cumulative and Cumulative Plus Project Levels of Service (Carson).....	175
Table 17-10 – Existing and Existing Plus Project Levels of Service (Caltrans)	177
Table 17-11 – 2040 and 2040 Plus Project Intersection Levels of Service (Caltrans).....	178

Figures

Figure 1	Regional Location Map	15
Figure 2	Project Location Map	17
Figure 3	Aerial View of Site and Surroundings.....	19
Figure 4	Proposed Site Plan.....	21
Figure 5	Proposed Building Elevations.....	23
Figure 6	East Boundary Wall Specifications.....	25
Figure 7	Proposed Landscape Plan.....	27
Figure 8	Views of Site Interior.....	29
Figure 9	Views of Existing East Boundary Walls and Fencing.....	31
Figure 10	Views Toward Site from Surrounding Vantage Points.....	33
Figure 11	Views of Surrounding Land Uses to the East and West.....	35
Figure 12	Views of Surrounding Land Uses to the North and South.....	37
Figure 13	Operational Noise Impact Modeling Locations.....	143

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Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



Project title: “Bridge Point South Bay II”/ Project No. R2017-004820/ Case No. RPPL2017010467

Lead agency name and address: County of Los Angeles Department of Regional Planning, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Erica Gutierrez, 213-974-6483

Project sponsor’s name and address: Bridge Point South Bay II, LLC, 1334 Parkview Avenue, Suite 310, Manhattan Beach, CA 90266

Project location: 20850 Normandie Avenue, southeast corner of Normandie Avenue and Torrance Boulevard, in the unincorporated Los Angeles County community of West Carson. Please refer to Figure 1 – Regional Location Map, Figure 2 – Project Location Map, and Figure 3 – Aerial View of Site and Surroundings.

APN: 7438-020-013. *USGS Quad:* Torrance 7.5 Minute Quadrangle

Gross Acreage: 8.98 acres

General plan designation: IL-Light Industrial

Community/Area wide Plan designation: N/A

Zoning: Manufacturing-Industrial Planned (MPD)

Description of project: The project is a request for a Conditional Use Permit (CUP) to authorize the proposed redevelopment of an 8.98-acre industrial site with a new 203,877-square-foot concrete warehouse building, including approximately 10,000 square feet of ancillary office space, and various site improvements. The CUP is limited to the construction of the warehouse building, ancillary office, space, and exterior improvements, including a 10-foot tall east boundary wall, parking lot, and landscaping. This project is to construct a core and shell building without interior tenant improvements.¹ The buildings would be occupied by one or more tenants. On-site parking would comply with County requirements. Please refer to Figure 4 – Proposed Site Plan and to Figure 5 – Proposed Building Elevations.

The CUP would authorize a warehouse and distribution type of land use, that typically includes assembly, warehousing, and/or the distribution of finished or partially finished goods and materials. The project site is zoned Manufacturing-Industrial Planned Development which permits warehouse uses with a CUP. Residential uses are prohibited on the site by a U.S. Environmental Protection Agency (USEPA) settlement agreement as a result of the soil contamination on-site (originating off-site), described further below. The proposed warehouse building would be rectangular in shape, in a single level, with an average interior clear space from floor to ceiling of 32 feet, an average exterior height from finished grade-to-roof of approximately 44 feet, and a maximum height above finished grade of approximately 55 feet. At the rear (south side) of the building, there would be 21 truck loading bays that are 185 feet deep with 14 feet of vertical clearance.

¹ Interior tenant improvements are not part of the project and will require issuance of separate building permits consistent with building code requirements prior to the issuance of a certificate of occupancy.

The warehouse would not be a cold storage facility. The project is also not designed to function as a “high cube warehouse”, which would be characterized by different site plan features such as truck bays on at least two sides of the building and significant truck/trailer parking areas to increase truck through-put. The project’s proposed warehouse building has a truck loading bay on only one side limited to 21 docks, and truck/trailer parking would be limited to the row of parking spaces directly opposite the loading docks. Please see Project Design Features (PDFs) 17-1 and 17-2 in Section 17. Traffic, making these enforceable conditions of the project.

The warehouse building, site plan and operations have all been designed to minimize noise to adjacent uses. The truck loading bays are located at the rear (south side) of the building facing an adjacent industrial use. The east and west walls of the building structure would extend south along the edges of the full depth of the loading area, thus enclosing both sides of the loading dock area to screen truck loading activities from neighboring residential properties to the east and west. The loading and unloading activities, including use of forklifts, would be confined inside the warehouse building pursuant to PDF 13-3, and the truck trailers would directly line up and be nearly flush with the warehouse opening for each trailer, thus limiting the amount of interior noise which could be heard outside the building. Outdoor activities would be limited and include regular site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas, and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels.

Further reducing noise impacts, the building would be setback 74 feet from the east property line, 84 feet from the Torrance Boulevard sidewalk to the north, 98 feet from the south property line, and 11 feet from the Normandie Avenue sidewalk to the west. The closest truck loading bay would be setback 250 feet from the closest residence to the east, and farther from all other residences; as described above, the truck loading bays would be inset into the building, therefore the building itself would act as a noise barrier. Trucks would be limited to using the Normandie Avenue driveway (please see PDF 3-3 in Section 3. Air quality making this an enforceable condition of the project), and therefore would not pass closer on-site than 250 feet from the closest residence to the east. Additionally, PDF 13-2 would be implemented to prohibit use of back-up or reverse beepers by trucks on-site. A new, 10-foot high, pre-cast concrete wall, with decorative finishes on both sides, would be constructed along the entire east boundary to provide a noise barrier and visual screen for the homes adjacent to the east. Please refer to Figure 6 – East Boundary Wall Specifications.

Finally, no outdoor operations would be permitted within 74 feet of the eastern property line during night and early morning hours (hours to be determined), which means that no employee parking or driving would be permitted within the eastern drive aisle during these nighttime hours. Please see PDF 13-1 in Section 13. Noise, making this an enforceable condition of the project.

Additional site improvements would include 219 spaces of surface vehicle parking arranged along the northern, eastern and southern edges of the site, 11 short-term exterior bike racks in the northwestern corner area, 20 long-term bicycle parking spaces to be provided in the building interior, and 39,790 square feet of landscaping (10 percent of the project site).

Landscaping that includes trees, shrubs and groundcover would occur around the site perimeter, and along the outer walls of the building to add natural visual accents. There are no fruit-bearing species proposed in the project’s landscape palette. Landscape areas and materials are depicted on Figure 7, Proposed Landscape Plan. Trees would be planted along the proposed 10-foot tall eastern wall to provide an enhanced aesthetic experience and further visual screen. In addition to the 10-foot wall proposed along the eastern property line, an 8-foot-high tubular steel fence would be erected along the south property line that separates the site from the adjoining industrial use. In accordance with the County’s Code standards, a 30-inch masonry wall would be constructed within the landscape area along the northern edge of the site, from the northwestern corner to the easternmost driveway entrance on Torrance Boulevard. All proposed improvements are designed to comply with the applicable development standards for the MPD Zone.

Vehicular access to the site would be from a single driveway entrance on Normandie Avenue and two driveways along Torrance Boulevard. All truck traffic would be restricted to the Normandie Avenue driveway, to reduce potential noise and air quality impacts to homes immediately to the east. Passenger vehicles could arrive/depart the site via any of the three driveways. The Normandie Avenue driveway would be 40 feet wide to accommodate trucks entering or exiting at the same time. Upon entering the site at this Normandie Avenue driveway, trucks or passenger vehicles would continue east along a 40-foot-wide drive aisle lined with parking spaces and leading to the loading docks at the rear of the building. Trucks would maneuver in and out of the loading zone within 178 feet of clear space between the dock high doors and the automobile parking spaces along the southern edge of the site. The two driveways on Torrance Boulevard would be 30 feet wide, as these would be for access by passenger vehicles only. Vehicles entering/exiting the western driveway would be limited to right turns in and out only. Full turning access would be allowed at the eastern driveway. Automobiles entering the site from the western driveway on Torrance Boulevard driveways could turn right or left upon entering the site to find parking, traveling along a 30-foot-wide drive aisle between rows of parking spaces. Vehicles entering from the eastern driveway on Torrance Boulevard could turn right to find parking or continue south along a 40-foot-wide drive aisle to find parking along the east side of the building or along the southern edge of the site.

Truck access and interior loading and unloading activities would be permitted on-site 24 hours a day, seven days a week, however outdoor operations within 74 feet of the eastern property line would be prohibited from 11 p.m. to 6 a.m. As stated in the Traffic Impact Study, approximately 37 daily trucks are anticipated for the project. This would result in 74 daily truck trips (to and from the project site). In addition, approximately 283 passenger vehicle trips are estimated to be generated by on-site employees. As noted in the responses to 13. Noise, later in this Initial Study, it is estimated that approximately 2/3 of the 74 daily truck trips (approximately 49 trips split evenly between inbound and outbound trips) would occur during the day and 1/3 overnight (approximately 25 trips, split evenly between inbound and outbound trips). However, to provide a conservative analysis, the noise study also analyzed a scenario in which 2/3 of the daily truck trips occurred during the nighttime. Nighttime truck travel reduces both traffic and air quality impacts, since trucks can avoid idling for long periods of time in daytime traffic.

Outdoor lighting is proposed, consisting of building-mounted security lighting on the north, east, and west sides and two pole lights at the rear boundary area, to provide sufficient illumination for the adjacent parking and drive area, where the building-mounted fixtures do not provide sufficient lighting levels. New lighting is described further in the Aesthetics section of this Initial Study. No illuminated signs are proposed.

Grading is planned to be balanced on-site, with no import or export of soil materials, with an estimated earthwork volume of roughly 29,000 cubic yards (cy) of cut and 29,000 cy of fill. Additional details concerning removal, recompaction, and replacement of undocumented fill materials within the proposed building footprint are provided in the Geology and Soils section of this Initial Study. A Soil Management Plan (SMP) will be implemented to deal with potential soil contaminants that might be encountered during the earth work phase of construction, as discussed in the Hazards section of this Initial Study. Water service would be provided via two points of connection to the existing water main within the adjacent segment of Normandie Avenue, within the existing sidewalk area. Sewer service would be provided via a connection to an existing sewer main within Torrance Boulevard, approximately 200 feet west of the northeast property corner, approximately 45 feet from the existing curb. Storm runoff would be conveyed to an existing Los Angeles County underground storm drain structure located on the easterly side of the project site.

Construction is proposed to be completed in five phases, over approximately one year, as shown in Table 1. Some minor overlaps of phases one to three may occur, as determined by the responsible contractor, but each phase would begin, for the most part, immediately after the preceding phase. “Minor” overlaps consist of up to several days of concurrent activities between an ongoing main construction phase and limited initial elements of the next phase that may occur in or near the area of ongoing main construction activity or in a different part of the site. Construction of the East Boundary Wall that is part of the USEPA remedy is required to be accomplished first before other construction activities that disturb soil can begin. Phases 4 and 5, however, would likely involve more

extensive overlaps of several days to several weeks as this is typical for construction projects of this type. Emissions modeling conducted for this Initial Study has analyzed maximum daily emissions for each of these phases individually and when phases 3 to 5 are combined together, so that all potential peak daily emissions are accounted for.

An Initial Study is prepared pursuant to California Environmental Quality Act (CEQA) guidelines § 15063(d)(2) and is required to identify the project environmental setting. The project environmental setting includes a description of prior site uses. The environmental setting provides a baseline for analyzing impacts from the proposed project. As noted below in this Initial Study, the site has a long history of prior uses including most recently as a vehicle and equipment dispatch yard and temporary hazardous and non-hazardous waste storage facility with traffic, noise, air quality and greenhouse gas (GHG) emission impacts on the surrounding community. Because this Initial Study is intended to provide a conservative analysis of potential project impacts, the environmental analysis in this Initial Study very conservatively does not take credit for the prior site use, which was active until shortly before applications were filed for the project. For instance, the Traffic Impact Study and air quality analysis do not take credit for vehicle trips and emissions associated with the prior use, and the noise analysis does not use the prior use as the existing baseline. This means that the project impacts identified in this Initial Study are greater than would have otherwise resulted if the prior use had been used as the baseline condition for the project under CEQA.

Table 1 – Approximate Construction Phasing, Duration and Activity Levels

Construction Phase/Activities	Duration	Equipment	Average/Peak Daily Crew Size	Part of Site Affected
1: East Boundary Wall Construction	6 weeks	Excavators and graders for minor pavement demolition/removal and to prepare construction footprint, auger for wall footings, concrete trucks, hydraulic crane to set wall panels	Average: 4 Peak: 7	Eastern edge
2: Demolition. This includes demolition of existing buildings, pavement, landscaping, walls and fencing.	8 weeks	Excavators, graders, dozers, asphalt grinders, saw cutting equipment, concrete crushing equipment, loaders, scrapers, trenchers	Average: 10 Peak: 20	Entire site, but more activity in western part where buildings are located.
3: Grading	4 weeks	excavators, dozers, scrapers, tractors, backhoes, water trucks	Average: 15 Peak: 15	Warehouse footprint
4: Building Construction/Architectural Coatings	28 weeks	Concrete trucks, laser screed, concrete finishing equipment, crane, scissor lifts, trenchers, forklifts, tractors, loaders	Average: 40 Peak: 100	Entire site
5: Paving and Site Improvements (paving, utility connections, landscaping)	10 weeks	Excavators, trenchers, graders, blades, laser screed, concrete trucks	Average: 15 Peak: 35	Site perimeter and loading dock area

Surrounding land uses and setting: The project site has been developed with a variety of commercial and industrial land uses since the mid-1940s, after it was converted from an agricultural use. Past businesses conducted on-site included manufacturing of liquid coatings for the aerospace industry, a plastics company, a roofing company, and automotive services. It is currently vacant, with site improvements remaining from the most recent business operated by Ecology Industries, Inc. (ECI), which was engaged in temporary storage and transport of hazardous and non-hazardous waste materials. Existing site improvements include extensive paving, five one-story buildings built between 1946 and 1967, perimeter landscape planters, a former vehicle wash rack, and perimeter walls and fencing, on all sides. There is a Los Angeles County Flood Control District (LACFCD), 17-foot-wide, storm drain easement along the eastern boundary of the project site, where there is an underground, 12.5-foot-

high x 8-foot-wide, reinforced concrete box drainage structure that handles runoff from the site and surrounding areas.

The site is located within a fully urbanized, unincorporated area referred to in the Los Angeles County General Plan 2035 as West Carson, where there is a mixture of low-rise industrial, residential and commercial land uses and an array of urban infrastructure elements, including overhead power lines. The aesthetic character of this area is not coordinated or of any particular theme or style, and there is an inconsistent mixture of building forms, bulks, heights, materials, signage, and street elements. Normandie Avenue borders the west side of the site; this is a four-lane Secondary Highway. Torrance Boulevard borders the north side of the site; this is also a four-lane Secondary Highway. Land uses adjacent to the project site include:

- North: Fast food restaurant, mini-market, tire sales, duplexes, and a neighborhood of one-and two-story single-family homes, on the north side of Torrance Boulevard, directly opposite the project site.
- South: One- and two-story, multi-tenant light industrial uses of various types, generally with no outside storage.
- East: One-story single-family homes and open land containing a closed, former landfill site now owned by the County of Los Angeles.
- West: Two- and three-story single-family homes on the west side of Normandie Avenue, directly opposite the project site.

Please refer to Figure 8, for photographs of the site interior. Refer to Figure 9 for photographs of the existing walls and fencing along the east boundary of the site. Views toward the project site from surrounding public vantage points are shown in Figure 10. Views of surrounding land uses on all sides are provided in Figures 11 and 12.

Background Regarding Site Contamination

A variety of hazardous chemicals and waste materials have been found on-site in a number of environmental site investigations. Sources from past land uses include leaks from underground storage tanks (USTs) and other residues from the former liquid coating business, and auto repair activities and a clarifier unit associated with the former ECI company. Soil contamination consisting of volatile organic compounds (VOCs) was detected in the vicinity of the former USTs at the time they were removed and later remediated to the satisfaction of the Los Angeles Regional Water Quality Control Board in July 1996. Groundwater at the property is approximately 65 feet below ground surface and was not encountered in any subsurface investigations conducted during environmental site assessments at the project site. Part of a contaminated ground water plume associated with releases of toxic substances at the Montrose USEPA-designated Montrose and Del Amo Superfund sites to the north extends beneath the project site but at the noted depth will not be encountered during project construction activities. Contaminants detected in the groundwater included VOCs, pesticides, polynuclear aromatics, and metals.

An additional source of contamination found on-site came from stormwater runoff from the former Montrose Chemical Corporation plant, located approximately 0.35 mile to the north/northwest, upstream of the project site. The Montrose property is a listed federal Superfund Site that is managed by the USEPA. The Montrose site was operated from the 1940s through 1982, manufacturing pesticides, including dichlorodiphenyltrichloroethane (DDT). For years, during rainy conditions, stormwater containing residual concentrations of DDT flowed from the Montrose facility in a southerly direction through an unlined storm drain ditch that flowed through the east side of the project site. In the 1970s, this open ditch was replaced with a 12.5-foot-high and 8-foot-wide concrete culvert and covered with soil; this drain is approximately 25 feet below the current ground surface. Soil investigations conducted in 2006 and 2007 identified traces of DDT, VOCs and petroleum hydrocarbons in this area of the site. Since this contaminated part of the site is a result of runoff from the Montrose Superfund site, the project site is included within the Montrose Superfund site.

Environmental site investigations conducted at various times included collecting and testing soils and soil gas samples. Human Health Risk Assessments (HHRAs) were completed in 2006 and 2010, and a third HHRA was completed by Ardent in 2018 (see Appendix G of this Initial Study). All of these determined that the residual soil

contaminants do not represent a significant threat to construction workers or future on-site employees, provided the land is restricted to some form of industrial or commercial use through recordation of a covenant to be attached to the land title. The most recent HHRA has been reviewed and approved by the USEPA and the California Department of Toxic Substances Control (DTSC). Correspondence from both agencies concurring with the methods and findings of the latest HHRA is provided in Appendix G of this Initial Study.

Given the extensive history of businesses engaged in handling or generating hazardous materials and wastes on-site, as well as the many years of effort to contain and remediate the Montrose Superfund site, the USEPA and DTSC continue to provide oversight concerning the evaluations of contaminants at this project site, and to ensure that future site development does not exacerbate the scope or volatility of contamination or threaten to release harmful substances to the environment or adversely affect neighboring land uses. An agreement has been reached between the current site owner and both the USEPA and DTSC to allow redevelopment of this property, provided a land use covenant is recorded to restrict potential site uses to industrial or commercial (residential uses are prohibited), that no structures are to be built over the buried storm drain area where DDT contaminated soils occur, and that a new barrier wall be constructed along the east boundary line to provide added protection for adjacent single family homes. USEPA approved the SMP for the site on April 25, 2019.

Please refer to the more extensive discussion in Section 9. Hazards and Hazardous Materials, regarding the site's history of contamination issues, remediation efforts, and evaluation of environmental and human health risks, as well as proposed measures to ensure that project construction activities do not accidentally result in release of potential unknown soil contaminants.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, has consultation begun?

Correspondence was sent on February 1, 2018 by the Los Angeles County Department of Regional Planning (LACDRP) to the following Native American Tribes, providing notice that this project is under review and subject to CEQA, and requesting notification regarding any desire for consultation, pursuant to this section of the Public Resources Code.

- Gabrieleno Tongva-San Gabriel Band of Mission Indians
- Gabrieleño Band of Mission Indians-Kizh Nation

The Gabrieleño Band of Mission Indians-Kizh Nation requested formal consultation on February 13, 2018. The County initiated consultation on May 3, 2018. Please refer to Section 18. Tribal Cultural Resources for a discussion of the results of the consultation.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

<i>Public Agency</i>	<i>Permit or Document Required by</i>
Los Angeles Regional Water Quality Control Board	NPDES General Construction Permit
U.S. Environmental Protection Agency	Soil Management Plan Bonafide Buyer's Purchase Agreement Human Health Risk Assessment Land Use Covenant

Major projects in the area:*Project/ Case No.**Description and Status*

RPPL2016005442

4-story research building at Los Angeles Biomedical Research Institute. Approved February 19, 2017. Not constructed.

RPPL2017005734

8.5 Acre County Park. Approved August 28, 2017.

RPPL2017006348

Walgreens Pharmacy. Approved March 23, 2017.

RPPL2017006348

44 Apartments. Under review.

RPPL2017007979

Interior remodel and ADA site upgrades at Harbor-UCLA Medical Center. Approved July 17, 2017.

Reviewing Agencies:*Responsible Agencies*☐ None

Regional Water Quality Control Board:

☒ Los Angeles Region☐ Lahontan Region☐ Coastal Commission☐ Army Corps of Engineers☒ U.S. EPA*Special Reviewing Agencies*☐ None☐ Santa Monica Mountains Conservancy☐ National Parks☐ National Forest☐ Edwards Air Force Base☐ Resource Conservation District of Santa Monica Mountains Area☒ California Department of Toxic Substances Control*Regional Significance*☒ None☐ SCAG Criteria☐ Air Quality☐ Water Resources☐ Santa Monica Mtns. Area☐*Trustee Agencies*☒ None☐ State Dept. of Fish and Wildlife☐ State Dept. of Parks and Recreation☐ State Lands Commission☐ University of California (Natural Land and Water Reserves System)*County Reviewing Agencies*☒ Department of Public Works☒ Fire Department

-Planning Division

- Land Development Unit

- Health Hazmat

☒ Sanitation District☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)☐ Sheriff Department☐ Parks and Recreation☐ Subdivision Committee☐

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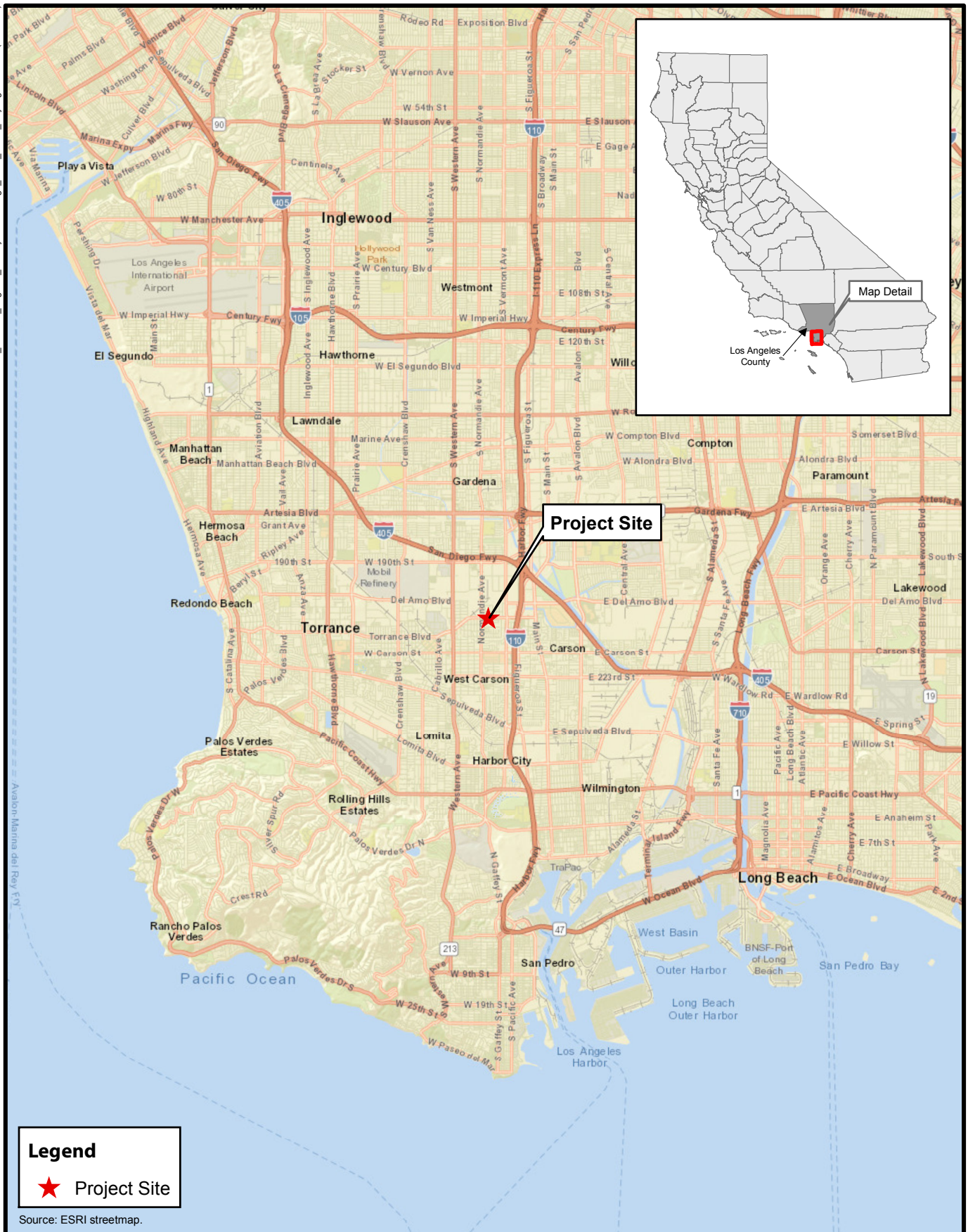


FIGURE 1
Regional Location Map

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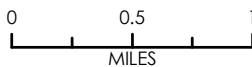
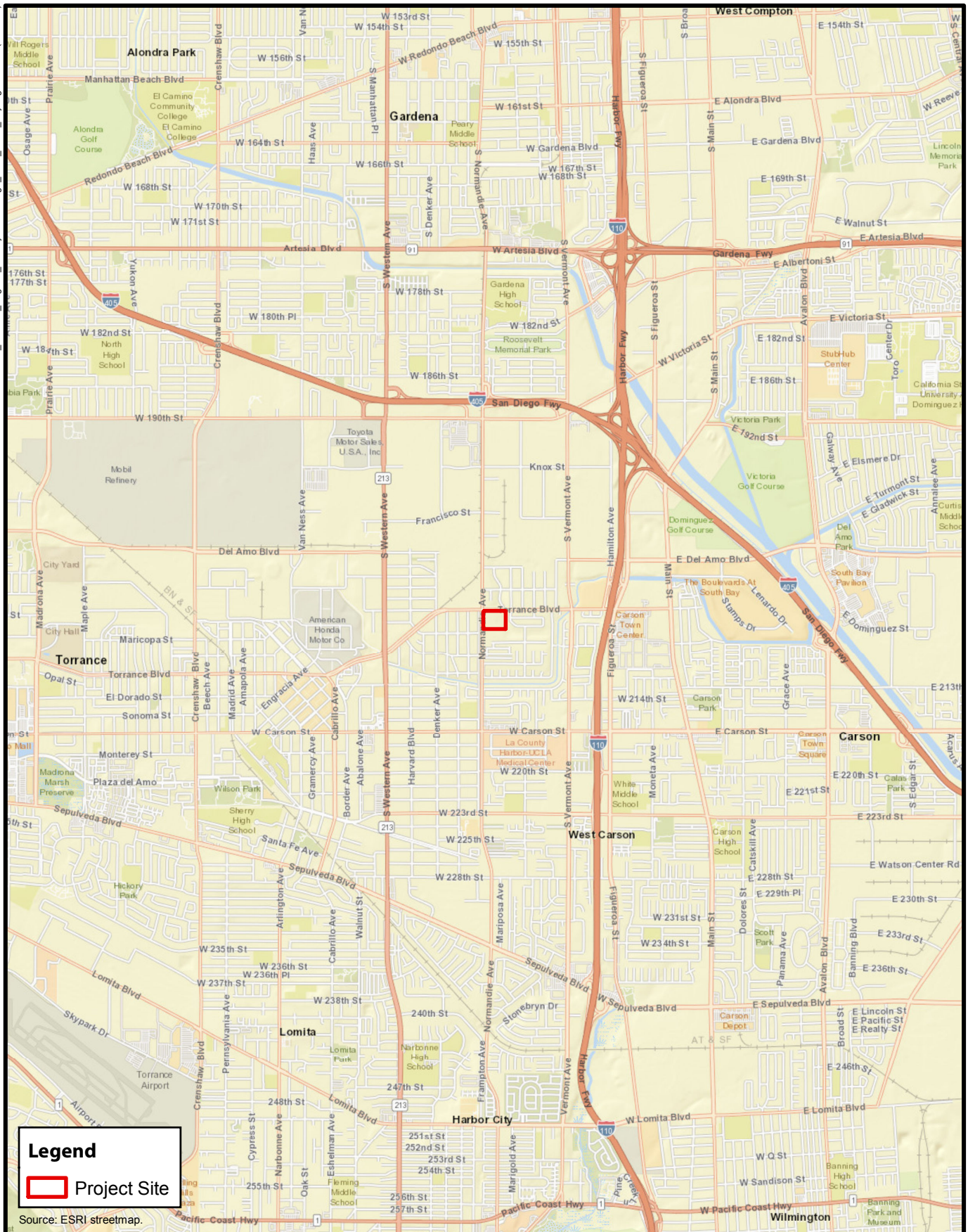


FIGURE 2
Project Location Map

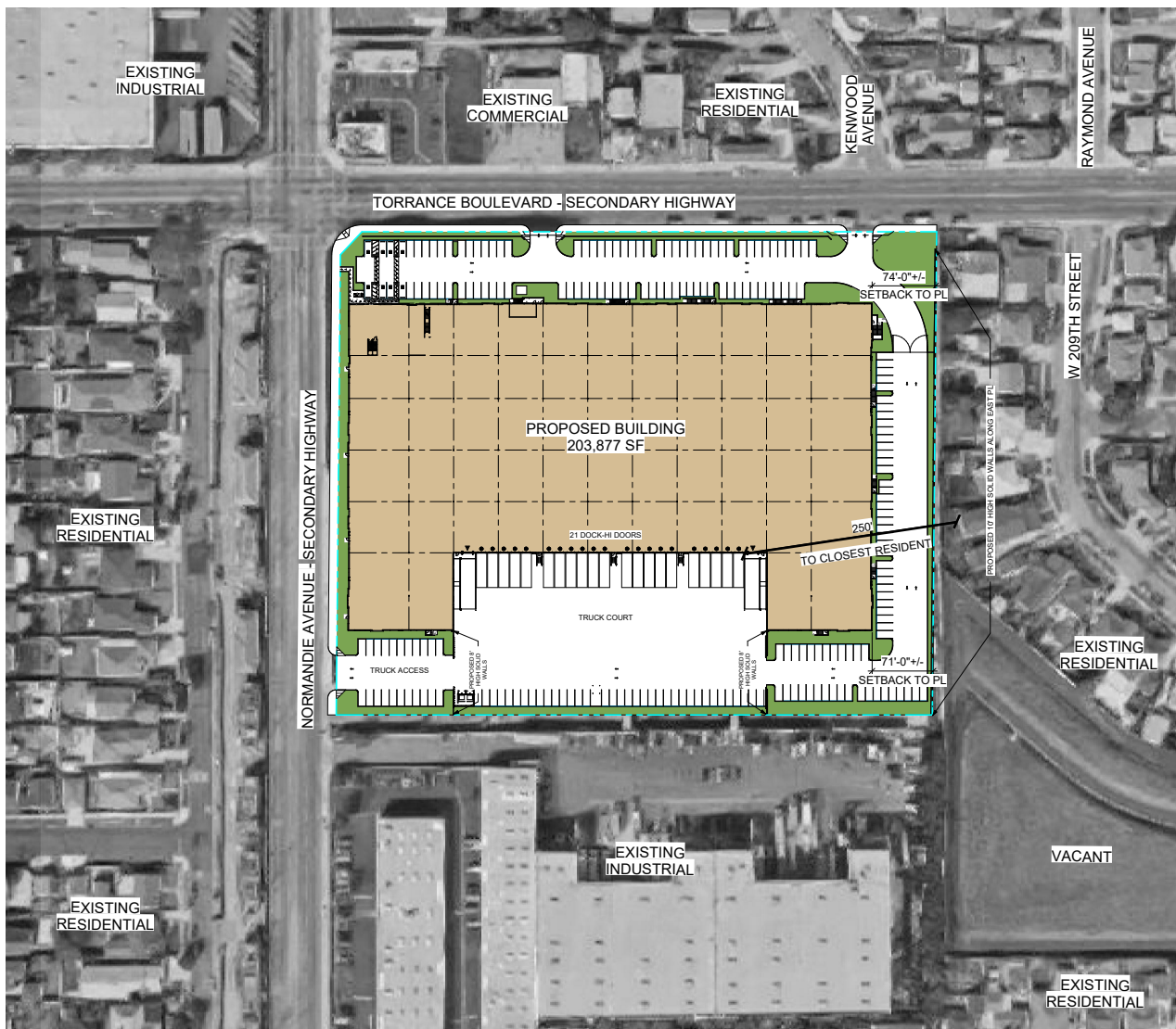
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Feet

FIGURE 3
Aerial View of Site and Surroundings

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Source: Herdman Architecture and Design, July 2019



Not To Scale

FIGURE 4
Proposed Site Plan

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NORTH ELEVATION



SOUTH ELEVATION



WEST ELEVATION



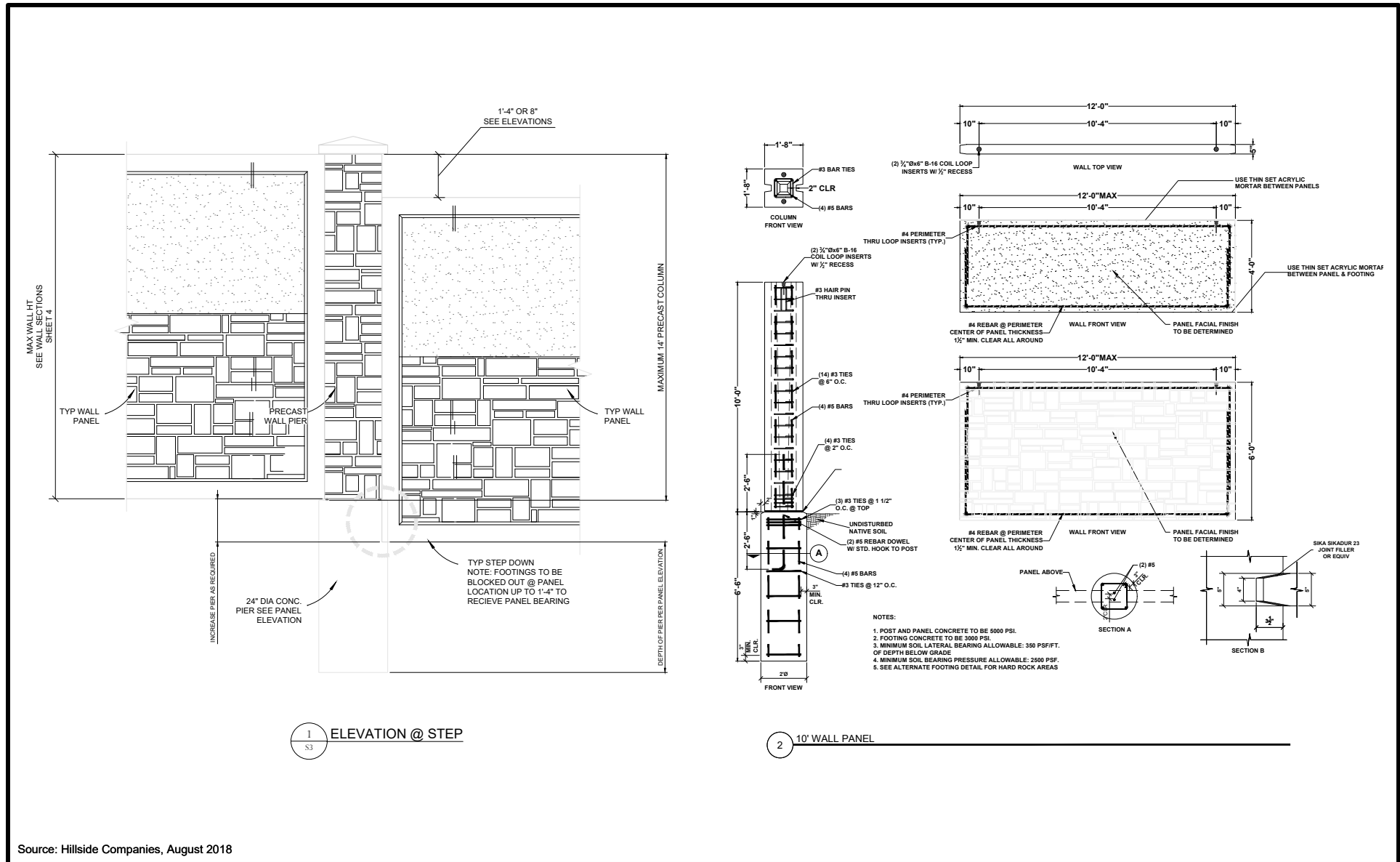
EAST ELEVATION

Source: Herdman Architecture and Design, August 2018

Not To Scale

FIGURE 5
Proposed Building Elevations

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Source: Hillside Companies, August 2018

Not To Scale

FIGURE 6
East Boundary Wall Specifications

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Debris pile near northeast corner of site



Paved surfaces covering majority of the project site



Existing buildings and front gate

Source: Michael Baker International, July 2018

FIGURE 8
Views of Site Interior

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Source: Michael Baker International, July 2018

FIGURE 9
Views of East Boundary Walls and Fencing

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Northern boundary of the site from across Torrance Boulevard showing slatted chain link fence, landscape screen, and two on-site buildings



Western boundary of the site from across Normandie Avenue showing landscape screen and overhead powerlines

View of the site from northwest corner of Normandie Avenue and Torrance Boulevard

Source: Michael Baker International, July 2018

FIGURE 10
Views Toward Site from Surrounding Vantage Points

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County-owned open space east of the project site



Single-family residential properties east of the project site



Residential uses west of the project site



Source: Michael Baker International, July 2018

FIGURE 11
Views of Surrounding Land Uses to the East and West

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Commercial uses to the north



Warehouse to the northwest



Industrial uses to the south



Single- and multi-family homes to the north



Source: Michael Baker International, January and July 2018

FIGURE 12

Views of Surrounding Land Uses to the North and South

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture/Forest | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Services |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings
of Significance |

DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

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

Signature (Prepared by)

Erica J. Juty

Date

9/19/19

Signature (Approved by)

Nooshin Pajdar

Date

9/19/19

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.
- 8) Climate Change Impacts: When determining whether a project's impacts are significant, the analysis should consider, when relevant, the effects of future climate change on : 1) worsening hazardous conditions that pose risks to the project's inhabitants and structures (e.g., floods and wildfires), and 2) worsening the project's impacts on the environment (e.g., impacts on special status species and public health).

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Be visible from or obstruct views from a regional riding or hiking trail?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) ***No Impact.*** The project site is located in a fully urbanized area, where there is a range of generally low-scale building massing associated with a variety of residential and non-residential land uses and extensive urban infrastructure improvements. The surrounding land uses include operational commercial and industrial uses to the south and northwest; single-story commercial and retail uses directly north of the project site; and residential uses to the west, east, and north, including multi-family residential buildings (a duplex and triplex) located on Torrance Boulevard.

The single-story commercial uses north of the project site include a hamburger restaurant, liquor store, on demand marijuana dispensary, and an automotive tire repair store. Further north of Torrance Boulevard along the west side of Normandie Avenue, there is a liquor store, a church, a plumbing repair service, and an automotive repair shop, all of which have buildings that were constructed between 1930 and 1960. Each of these businesses has one- or two-story-high, street-side signage of varying materials and shapes visible from Normandie Avenue. Several of these signs are illuminated.

To the north of the project site, west of Normandie Avenue, there are five warehouse buildings with rectangular and box-shaped buildings surrounded by impervious surfaces (e.g., loading bays, drive aisles, and parking areas). The warehouse building at the immediate northwest corner of Torrance Boulevard and Normandie Avenue, constructed in the 1960s, is over 275,000 square feet in size and is similar in height to the proposed development. North of this building, also located on Normandie Avenue, is a 2018-vintage, 510,000-square-foot single industrial building. Three additional warehouse buildings of varying size and age are located between Normandie Avenue and Denker Avenue. All land uses north of the site from Del Amo Boulevard to Interstate 405 are industrial or commercial in nature.

The single-family residential neighborhood to the east is characterized by one- and two-story, post-war traditional and ranch style, detached homes, constructed in the 1950s and 1960s. An exception is the home

immediately adjacent to the northeast corner of the project site, which was constructed in 1990. The residential neighborhood north of Torrance Boulevard is generally characterized by one- and two-story post-war traditional, detached homes, constructed in the 1950s and 1960s; however, residences along South Kenwood Avenue were constructed in the 1930s and 1940s. Many of the parcels on South Kenwood Avenue, north of Torrance Boulevard, are multi-family, with multiple detached, residential structures on one lot. This neighborhood also contains two multi-family residential buildings along Torrance Boulevard. The residential neighborhood to the west and southwest of the project site is mostly characterized by one- and two-story single-family detached homes, constructed in the 1940s and 1950s; however, two- and three-story, Spanish-style homes were recently constructed (2017) on the former railroad right-of-way between South Normandie Avenue and Normandie Avenue, immediately west of the project site. See Figures 10 and 11 for photos showing the visual character surrounding the project site.

The visual environment surrounding the project site is fully urbanized, with varying building sizes and varying architectural styles. There are no natural scenic elements anywhere in this area, such as a ridgeline, hills, stands of trees, or an expanse of natural open space or some other prominent natural or cultural features that provide a focal point of interest from the surrounding area. There are no scenic elements of the built environment in the surrounding area, such as historic structures or districts, parks, views of major city skylines, or substantial concentrations of open space and landscaping. The topography of the surrounding urban area is relatively flat; thus, the proposed development would only be visible from the land uses immediately surrounding the site and from motor vehicles traveling toward the site along Normandie Avenue and Torrance Boulevard. Additionally, the existing uses on the project site do not have characteristics of an anthropogenic scenic vista (such as extensive landscaping, historic architecture, or historic structures), nor would the proposed development likely disrupt the view of such an anthropogenic scenic vista given the absence of any visual features that comprise what might be considered to be a scenic vista. See Figure 9 for photos of the site from surrounding vantage points and Figure 11 showing photos of nearby industrial uses. Given these circumstances, the proposed project would have no impact on a scenic vista.

- b) **No Impact.** There are no public riding or hiking trails along the adjacent or more distant segments of Normandie Avenue or Torrance Boulevard. The closest County trail to this project site is the Los Angeles River Trail, which is approximately 5.5 miles east of the project site. Compton Creek bike trail is approximately 5.1 miles east of the project site. The proposed project would not be visible from these trails given the distance, the flat topography of the area, and existing urban development obstructing the view. The proposed project would have no effect on any views from these trails.
- c) **No Impact.** As discussed in the response to a), above, there are no natural or cultural scenic resources on or within the vicinity of the project site, which is a fully urbanized part of the Los Angeles metropolitan area, with a mixture of building forms and land uses, overhead power lines, and a host of urban infrastructure elements that comprise the visual landscape. Please refer to the response to topic 5a), which indicates that a review of the County General Plan and a records search at the South Central Coastal Information Center determined that there are no known historic resources on or near the project site. Neither Torrance Boulevard nor Normandie Avenue is part of the state highway network, and neither are designated in the County of Los Angeles General Plan as some kind of a scenic corridor. The closest officially designated state scenic highway is part of the Angeles Crest Scenic Byway, State Highway 2, from near La Canada-Flintridge north to the San Bernardino County line. This state scenic highway is approximately 25 miles from the project site. State Route 110, Arroyo Seco Historic Parkway, between milepost 25.7 and 31.9 in Los Angeles, is approximately 17 miles from the project site. State Highway 1 between Ximeno Avenue in Long Beach to San Juan Capistrano, which is approximately 9.5 miles from the project site, is listed as an eligible state scenic highway that is not officially designated. The proposed project would not be visible from any of these state highways, given the long distances from the project site. With an absence of any scenic resources on or near the site and the considerable distances from the

nearest designated State scenic highways, this project would have no impacts on any scenic resources or on any views from a scenic highway.

- d) ***Less Than Significant Impact.*** With a mixture of building forms and intensities, varying states of property maintenance, a plethora of overhead utility poles and signs, major streets, and a mixture of land uses, there is no coherent or coordinated “visual character” in the project vicinity. Currently, the project site is an inactive remnant of a prior hazardous materials transfer business that operated here for a number of years. There are five non-descript, single-story buildings on the western side of the site, which total approximately 22,300 square feet of building area and are surrounded by approximately 275,000 square feet of paved area. There is an uncovered debris pile on the project site along the northeast side, but this is not directly visible from Torrance Boulevard, due to on-site visual screening created by slatted chain link fencing, and dense landscaping at the top of the slope. The vast majority of the site interior consists of open pavement surfaces, where there was formerly a variety of outdoor storage and regular truck traffic and parking. In general, the existing buildings and impervious surfaces within the project site are not suitable for occupancy. The existing buildings are characterized by broken windows, crumbling load docks, and heavily damaged interior areas. The project site’s paved area has deep cracks where vegetation has taken root. See Figure 8 for photos of the site interior, including existing buildings in disrepair, the debris pile on the northeast portion of the site, as well as the paved surfaces in the interior of the site.

The project site interior is almost entirely obstructed from views by neighboring low-rise residential and commercial land uses and the adjacent streets because of the presence of perimeter walls, slatted chain link fencing, and dense landscaping. See Figure 10 for photos of the site from surrounding vantage points, which show the slatted chain link fencing on the north side of the site, as well as the dense landscaping and perimeter walls on the north and the west frontages. Several single-family homes located on the western side of Normandie Avenue have a second story and, in a few cases, a third-story element with windows that provide views of the interior of the project site. See Figure 11 for photos of the residential uses west of the project site. For the most part, therefore, the project site is not visually prominent from the adjacent streets and surrounding land uses, although it is a fairly large property. Strings of overhead utility poles and electrical lines exist along the eastern, southern, and western site perimeter and there are a few poles on the Torrance Boulevard frontage. See Figures 9, 10, and 12 for photos showing the utility poles and overhead electrical lines along the eastern, southern, and western site perimeters.

From the west, the on-site buildings are largely hidden from view from Normandie Avenue by a dense landscape screen, as well as a solid brick wall covered with climbing vegetation approximately 7.5-foot- to 8-foot-high located between the driveways on Normandie Avenue. There is a line of olive trees in part of the landscape area along Normandie Avenue. The Normandie Avenue frontage from the northern driveway to the Torrance Boulevard intersection is characterized by a dense vegetation hedge in front of an 8-foot-slatted chain link fence. The hedge does not shade the sidewalk along Normandie Avenue. The hedge, brick walls, and fencing are exhibiting signs of lack of maintenance. See Figure 10 for photos of the Normandie Avenue frontage.

Views into the site from the north (across Torrance Boulevard) are blocked by on-site visual obstructions created by the slatted chain link fencing, a dense landscaping hedge at the top of the slope, and one of the on-site buildings that backs up to the street, near the corner of Normandie Avenue. The landscape screen extends approximately 500 feet along the site’s Torrance Boulevard frontage. The top of a one-story, domed roof structure is somewhat visible above the hedge screen. The remaining Torrance Boulevard frontage in the northeast corner of the site is approximately 130 feet of slatted, 8-foot-tall chain link fencing. The Torrance Boulevard frontage of the project site includes a solid concrete wall, 2.2 feet tall and approximately 50 feet long at the northwestern corner of the site. See Figure 10 for photos of the project site from the north, across Torrance Boulevard.

Six single-family residential properties abut the project site to the east, all but one of which have useable yard space facing the site. Along the eastern edge of the site, views into the site from the adjacent homes are mostly screened by a damaged block wall and fencing along the eastern edge of the site, as well as mature landscape elements on adjacent properties. This eastern wall has a mix of sections of 4.5-foot- to 8-foot-tall block walls, 7-foot-tall slatted chain link fence, and 9-foot-tall chain link fence. The damaged sections of wall provide visual openings into the site. See Figure 9 for photos of the east boundary walls and fencing.

Open land with a low grassy groundcover and a paved road are adjacent to the southeastern edge of the site; this is County-owned land and a former landfill site. See Figure 11 for a photo of that land. To the south is an industrial site, separated from the project site by a block wall, which contains large, white-colored, two-story tilt-up concrete structures and truck parking areas that are not readily visible from the local section of Normandie Avenue. To the northwest of the project site, beyond the intersection of Normandie Avenue and Torrance Boulevard, there is a large concrete building housing a warehouse/distribution facility with outdoor cargo loading areas that is highly visible from the streets. See Figure 12 for photos of the industrial uses to the south, as well as the warehouse to the northwest of the project site.

The proposed project would demolish and remove all existing site improvements and redevelop the site with a single-level, tilt-up concrete structure, totaling 203,877 square feet, along with approximately 39,790 square feet of new landscaping. See Figure 5 for detailed elevations of the proposed building. The building would have an interior clear space from floor-to-ceiling of approximately 32 feet. The complete structure, from floor to roof, would have an average height of approximately 44 feet above the finished ground level, with heights ranging from a minimum of 39 feet, 4 inches above finished grade to a maximum height of approximately 55 feet above finished grade in the northeastern corner, due to approximately 15 feet of elevation change between the northwest corner and the northeast corner of the lot. The building would rise nearly 50 feet above the ground elevations of the residential properties to the east, 74 feet away from the property line. The building height and bulk on the site would thus increase compared to existing conditions; however, the proposed building would comply with all of the County's development standards pertaining to building height, setbacks, and landscape coverage.

On the eastern side, next to several single-family residential properties with side or rear yards abutting the project site, the building would be set back approximately 74 feet from that eastern boundary and a 9-foot-wide landscape strip would be constructed along the east edge wall to provide additional visual screening for those homes. Pursuant to a prior agreement with the USEPA, the project includes construction of a new east edge wall comprised of 10-foot-high pre-cast concrete panels to be constructed as the first phase of the proposed project. The new wall would be articulated with patterns on both sides, for more visual interest. See Figure 6 for the east wall design options. The landscaping along this eastern wall would include ground cover, as well as Chinese Flame Trees and Afghan Pines.

On the western side, the building would be set back 11 feet from Normandie Avenue, with a minimum 10-foot-deep landscape buffer consisting of ground cover, Camphor trees, Chinese Flame trees, and Crape Myrtle trees, as well as an 8-foot-high concrete screen wall on the southwest side of the site, between the proposed building and the southern site boundary. This wall houses a 40-foot-long swinging metal gate shielding the loading zone from Normandie Avenue. On the northern side, the building would be set back 84 feet from Torrance Boulevard with a minimum 10-foot-deep landscape buffer consisting of ground cover, Carrotwood trees and Chinese Flame trees, as well as a 30-inch-high masonry wall along the north frontage. The south edge along the existing block wall would have a landscape buffer of groundcover and Carrotwood trees, and a wrought iron fence would be built next to that wall. A broader landscape area would be created at the northeastern corner of the site, providing a larger visual separation between the

proposed building and the adjacent homes. See Figure 4 for delineation of the landscaped areas, proposed building setbacks, and locations of masonry and block walls.

The parking spaces serving the project would be located on the north, east, and south sides of the building, as well as up against the landscaping buffers at the north and south edges of the site. The landscaping would include a mix of the above-mentioned tree species and ground cover against the proposed building in the parking areas, which contributes to an estimated 17,000 total square feet of shading in the parking area when considering shade that would be provided by trees in the landscaping buffers on the north and south side of the site. There are no fruit-bearing species proposed in the project's landscape palette. The locations of the parking spaces, the drive aisles, and the loading zone are shown in Figure 4. Please refer to Figure 7, which illustrates the proposed landscape elements that would contribute to an improvement in the visual character and quality of the site, compared to existing conditions.

The combination of the building setbacks from the site boundaries, together with the perimeter landscaping and walls, would reduce the visibility of the building bulk on the site from neighboring uses, as well as from Torrance Boulevard and Normandie Avenue and would act to soften the views of the facade. In addition, the building elevations facing Torrance Boulevard and Normandie Avenue would be articulated with scoring of flat surfaces and horizontal color bands. Each corner of the building would be finished in a storefront style, with extensive glazing, adding more visual interest. Please refer to Figure 5, which illustrates the architectural features of the proposed building.

Overall, the proposed project would represent an improvement in the visual character of the site and, with substantial improvements to perimeter landscaping and walls, would improve the visual screening for neighboring homes to the east. The project's impact, therefore, would be less than significant.

- e) ***Less than Significant Impact.*** Several pole-mounted lighting fixtures remain in the site interior from the previous land use; however, they are not functional and there are no other existing outdoor lighting sources on the project site. The area is highly urbanized and therefore already impacted by night lighting from street lights, exterior security lights within existing industrial uses to the south and northwest and commercial uses to the north, as well as by outdoor lighting in nearby residential neighborhoods, vehicle headlights on Torrance Boulevard and Normandie Avenue, traffic lights, and lighted commercial signage.

Since no night construction is proposed, there would be no night lighting impacts associated with the construction phases.

The proposed project would include two pole-mounted light fixtures on the south side of the project site. These pole-mounted light fixtures are Type 3 super saver LED with a cool or neutral white output, mounted at 29-feet high, with a rear-mounted shield to prevent light intrusion into the adjacent driveway and parking area within the neighboring industrial development. The proposed building would have 19 building-mounted light fixtures (six on the north side, five on the east side, and eight on the south side), to provide visibility and safe illumination levels for employees and truckers who are active after daylight hours. These building-mounted light fixtures are proposed as Type 3 super saver LED with a cool or neutral white output and would be mounted 32 feet high on the building side.

A preliminary photometric study was prepared as part of the project plans submitted to the County, to determine outdoor lighting levels across the site (see Appendix A of this Initial Study). This study shows that the site perimeter would receive very low amounts of light as a result of the proposed light fixtures (generally, less than 1 LUMEN). The proposed east boundary wall and the proposed landscaping along that edge of the site would help screen out any illumination from the proposed lighting fixtures to be mounted on the east side of the warehouse building. At a distance of 74 feet from the east property line, and the relatively low illumination level of those fixtures, the photometric study indicates very low lighting levels would reach the east property line. There are no building- or pole-mounted light fixtures on the

western side of the building, so the single-family homes to the west of the project site would not experience additional light or glare as a result of this proposed project.

Surrounding land uses are subject to existing night lighting from commercial and industrial buildings near the project site, and from vehicle headlights transiting the busy intersection of Normandie Avenue and Torrance Boulevard. The majority of the proposed project's building elevations would be made of concrete, with some glazing at the entrances and on the building sides; therefore, there would be little or no light reflection from building surfaces. The truck doors on the south side of the building are to be pre-finished by the manufacturer in white and would not be expected to cause any glare. Since traffic patterns along Torrance Boulevard and along Normandie Avenue are parallel to the adjacent land uses, headlights from the project's added vehicular traffic would not shine toward those land uses. Vehicles exiting the site from Torrance Boulevard would do so at locations where there are no homes directly across the street; thus, headlights would not shine onto any homes when exiting the site driveways on Torrance Boulevard. Vehicles exiting onto Normandie would do so from an existing driveway, that faces single family homes on the west side of the street. The headlights would be lower than the approximately 8-foot-high wall located along the east side of that residential development and would not shine into any windows or yards of those homes.

The only shadow-sensitive adjacent land uses are the six single-family residences on the eastern side, where there are rear yards that abut the project site. The proposed building is set back approximately 74 feet from the east property boundary and would be separated from the homes by a new 10-foot-high, concrete screening wall. The industrial use to the south and the commercial uses on the opposite (north) side of Torrance Boulevard are not considered to be "shadow sensitive" land uses. The homes in the community to the north, accessed by Kenwood Street, are approximately 164 feet away from the proposed project building and thus are too far away to be affected by any shadows cast by the proposed project building. The shadow impacts of this proposed development would be most intense in the winter months, when the sun angles are lower, resulting in longer shadows cast by the building.

While the City of Los Angeles' thresholds concerning shadow impacts have not been adopted by the County of Los Angeles, in the absence of any guidance in the County's thresholds, they are considered to be an appropriate framework for assessing this project's impacts. The City of Los Angeles CEQA Thresholds Guide states that a significant impact related to shadows would occur in the winter (between late October and early April) if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time. Under these thresholds, a significant impact related to shadows would occur in the summer (between early April and late October) if shadow-sensitive uses would be shaded by project-related structures for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time.

To assess the shadow impacts of the proposed warehouse structure, an analysis of the shadow footprints cast by the building on the winter and summer solstices was completed and is provided in Appendix A of this Initial Study. Results are as follows.

In the winter months, the building shadow would begin to shade five of the single-family homes (shadow-sensitive uses) to the east of the project site for approximately two hours starting at approximately 2:00 p.m. This minimal time is less than would be considered a significant impact under the City of Los Angeles CEQA Threshold Guide. Based on the short time the five homes are impacted (one hour between the hours of 9:00 am and 3:00 pm), the project would have a less-than-significant shadow impact in winter.

In the summer months, the building shadow does not leave the footprint of the site during the day and does not cast a shadow on the adjacent shadow-sensitive uses. Since the proposed development would not cast a shadow on shadow-sensitive uses, the shadow impact in summer is less than significant.

The shadow analysis determined that the proposed building would not cast any shadows to the west that would extend beyond the Normandie Avenue traffic lanes. Given these circumstances, the project would not result in adverse shadow impacts.

References:

Herdman Architecture +Design, *Site Plan – Bridge Point South Bay II, Normandie Avenue and Torrance Boulevard, Unincorporated Los Angeles County, California*. February 2018.

County of Los Angeles Department of Parks and Recreation. <https://trails.lacounty.gov/>, accessed July 2018.

South Coast Information Center – California Historical Resources Information System, *Records Search File No.: 19198.5192*. July 24, 2018.

Gregg Electric, Incorporated. *Site Lighting Plan*. Updated August 1, 2018.

Gregg Electric, Incorporated. *Exterior Lighting Elevations*. Updated August 1, 2018.

Herdman Architecture + Design, *Proposed Elevations – Bridge Point South Bay II, Normandie Avenue and Torrance Boulevard, Unincorporated Los Angeles County, California*. January 2018.

Herdman Architecture + Design. *Shadow Exhibit Winter 10am, 2pm & Summer 10am, 2pm*. August 1, 2018.

Hunter Landscape, *Conceptual Landscape Plan Torrance and Normandie, Los Angeles County, California*. October 2017.

Thienes Engineering Inc., *Existing Building / Wall Height for Bridge Point South Bay II*. Updated July 24, 2018.

Los Angeles Magazine. 2012. *100 Years of L.A. Houses*. February 2012. Pg. 96.

Los Angeles County Office of the Assessor. *Property Assessment Information System*. <http://maps.assessor.lacounty.gov>. Accessed October 11, 2018.

2. AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) **No Impact.** The Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data that are used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. The project site is not located within any FMMP designation map.

The project site is currently developed with vacant buildings, extensive pavement, and landscaping along the two street frontages. No farmland, agricultural uses, or related operations occur within the project site or surrounding area. See Figure 7 for views of site interior and Figures 10 and 11 for views of land uses

surrounding the project site. Therefore, the project would not convert Farmland to non-agricultural use, and no impact would occur.

- b) **No Impact.** As shown in Figure 5.2-7, Proposed Agricultural Resource Areas, in Chapter 9, Conservation and Natural Resources Element of the 2035 Los Angeles County General Plan, the proposed project site is not located in an area that is designated as an “Agricultural Resource Area.” As stated above, the project site is zoned MPD and has a General Plan Land Use Designation of Industrial - Light Industrial (IL). Neither of these existing zoning classifications supports agricultural or farming uses, except for limited private horticultural activities or a greenhouse. The project site has been developed with a variety of commercial and industrial land uses since approximately 1940 and is located in a fully developed area comprised of a mix of residential, commercial, and industrial land uses and a full array of urban infrastructure. This property is not encumbered by a Williamson Act contract or any other sort of deed or land use restrictions intended to preserve or foster agricultural uses. The proposed project would have no impact involving a conflict with zoning for agricultural use.
- c) **No Impact.** The project site has been developed with a variety of commercial and industrial land uses since approximately 1940, none of which contained any forestland or timberland. As noted above, the subject property is zoned MPD, which is intended to foster and control development of a range of IL uses and has no applicability to any kind of forest land or timberland. Therefore, there would be no impact involving a conflict with zoning for forest land or timberland.
- d) **No Impact.** The project site has been previously disturbed and developed with a variety of commercial and industrial land uses and does not contain any forestland. Therefore, the project would not cause the conversion of forest land to non-forest use, and no impact would occur.
- e) **No Impact.** The site is located in an urbanized area and does not contain any agricultural uses, Farmland, forest land, or timberland resources. As a result, the proposed warehouse/distribution project would not cause the conversion of Farmland to non-agricultural use or forest land to non-forest use, and no impact would occur.

References:

General Plan Agricultural Resource Areas Policy Map Figure 9.5 http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-5_agricultural_resource_policy.pdf

Classification of agricultural lands within the FMMP, see GP DEIR pg. 5.2-2:
http://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

Vista Environmental prepared an Air Quality, Greenhouse Gas, and Health Risk Impact Analysis (report) for the proposed project in October 2018. The results of that analysis are summarized in response to the impact thresholds below. The report can be found in this IS/MND as Appendix B.

- a) ***Less Than Significant Impact.*** The project site is in a portion of unincorporated Los Angeles County that is within the South Coast Air Basin (SCAB), which is bound by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and by the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded; in 2015, the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) were exceeded on one or more days in the SCAB for ozone (O₂), inhalable particulates (particulate matter \leq 10 microns, PM₁₀), and ultra-fine particulates (particulate matter \leq 2.5 microns, PM_{2.5}) at most monitoring locations. No areas of the SCAB exceeded federal or state standards for nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), sulfates, or lead (Pb). Because of the violations of the CAAQS, the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source pollutants; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to comply with federal and state air quality standards.

The SCAQMD CEQA Handbook (1993) states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." For the purpose of this analysis, the proposed project is considered to be a "significant project", but it does not require a general plan amendment or zone change, as the proposed warehouse/distribution facility is consistent with the County's land use policies and zoning standards. Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- Whether the 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 timely attainment of air quality standards or the interim emission reductions specified in the AQMP; and
- Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both criteria are evaluated below:

Criterion 1 - Increase in the Frequency or Severity of Violations?

For the purposes of this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table 3-1.

Table 3-1 – SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance

	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO _x	PM ₁₀	PM _{2.5}
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

Source: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

Table 3-2 shows the SCAQMD local air quality thresholds for NO₂, PM₁₀ and PM_{2.5} for both construction and operational activities.

Table 3-2 – SCAQMD Local Air Quality Thresholds of Significance

Activity	Allowable Emissions (pounds/day) ¹			
	NOx	CO	PM ₁₀	PM _{2.5}
Construction	91	664	5	3
Operation	91	664	1	1

Notes:

¹ The nearest sensitive receptors are single-family homes located adjacent to the east side of the project site. According to SCAQMD Methodology, all receptors closer than 25 meters are based on the 25-meter threshold.

Source: Calculated from SCAQMD's Mass Rate Look-up Tables for 1 acre in Air Monitoring Area 3, Coastal Southwest Los Angeles County.

Construction activities would generate a variety of air pollutant emissions, including exhaust from combustion-powered machinery, trucks and passenger vehicles, fugitive dust from demolition, grading and construction activities, and release of VOCs associated with painting and coatings applied to the warehouse building and in the laying of asphalt in parking and drive areas. A quantitative analysis of construction period emissions was prepared, based on the construction phases and range of equipment and durations described in Table 1, presented in the Environmental Checklist Form section of this Initial Study.

Based on the air quality modeling analysis contained in the technical air quality study prepared for this Initial Study (see Appendix B of this Initial Study) and summarized in Table 3-3 later in this section, short-term regional construction air emissions would not result in significant impacts based on SCAQMD thresholds of significance. The short-term construction period unmitigated emissions would exceed SCAQMD's Local Significance Thresholds (LST) for particulate matter (PM₁₀) during the demolition phase, as identified in Table 3-4. However, to reduce those temporary dust emissions to below the LST, Mitigation Measure 3-1 will be imposed to require watering of any construction activity that generates dust, at least three times a day, along with other measures that would reduce dust emissions, such as covering soil stockpiles, sweeping adjacent street segments where vehicles have left dust behind, and ceasing activities during high winds, which reduces short-term construction LST impacts to less than significant levels.

Over the long-term, the ongoing operation of the proposed project would generate air pollutant emissions that are less than significant on a local or regional basis as they would be below SCAQMD local thresholds of significance. The analysis for long-term regional and local air quality impacts (as indicated in Tables 3-5 and 3-6) show that the project's operational pollutant concentrations would not exceed the air quality standards. Therefore, a less-than-significant impact would occur, and no mitigation would be required.

Thus, based on the information provided above, the proposed project would not result in an increase in the frequency or severity of existing air quality violations, would not contribute to new violations, or delay timely attainment of air quality standards or interim emissions reductions identified in the AQMP. It is noted that the analysis of long range emissions for the proposed project was conservative, in that it does not assume substantial reductions in pollutants from future regulatory actions that are expected to be applied to the manufacture of newer trucks over time. The project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The AQMP is developed through use of the planning forecasts provided in the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Federal Transportation Improvement Project (FTIP). The RTP/SCS is a major planning document for the regional transportation network and land use patterns within Southern California. The RTP/SCS is a long-range plan that is required by federal and state law and is updated every four years. The FTIP provides long-range planning for future transportation improvement projects that are constructed in Southern California with state and/or federal funds. Local governments are required to align their local general plans with these regional plans, and this includes participating in the growth forecasts developed for the RTP/SCS to reflect the land use assumptions in the local general plans. See discussion below, Greenhouse Gas Emissions, for a discussion of the project's consistency with the RTP/SCS. For this project, the Los Angeles County General Plan's Land Use Plan underlies the assumptions concerning growth and associated air pollutant emissions that are represented in the AQMP.

The proposed project is currently designated as IL in the General Plan and is zoned Manufacturing Industrial Planned Development (MPD). The proposed warehouse/distribution project is consistent with the current land use designation and would not require a General Plan Amendment or zone change. As such, the proposed project is not anticipated to affect the AQMP long range emissions forecasts for the project area and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project would not result in an inconsistency with or impede implementation of the SCAQMD AQMP. It is also noted that the proposed project would not conflict with the main emissions reduction strategies of the AQMP, with regard to increased controls on stationary sources, improved transportation emissions technologies, or capital improvements to facilitate increased passenger vehicle occupancies or increased use of public transit. All of those strategies are outside of the scope of this project. It is noted that as drayage trucks and passenger vehicles are gradually replaced over time with newer, cleaner operating models, that the levels of exhaust emissions associated with the project's traffic would decline over time. It is further noted that PDF 3-4 requires forklifts and street sweepers to be non-diesel, powered by alternative fuels, electrical batteries or other non-diesel fuels that do not result in diesel particulate emissions.

- b) ***Less Than Significant Impact with Mitigation Incorporated.*** The proposed project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. The following section calculates the potential air emissions associated with the peak construction activities, which would be when warehouse construction/architectural coatings, plus paving and other site improvement activities occur concurrently, along with typical daily operations of the proposed project and compares the emissions to the SCAQMD standards.

Construction Emissions

The California Emissions Estimator Model (CalEEMod) was used to calculate the construction-related regional emissions from the proposed project. This includes exhaust emissions from construction crew vehicles, dump trucks, bulldozers and other combustion-powered equipment, particulate matter generated during demolition, grading, and other ground disturbing activities, and gaseous compounds generated during application of paints and coatings to the warehouse structure and from asphalt and concrete paving. The input parameters utilized in this analysis are detailed in the Air Quality Study prepared for this IS/MND. The worst-case summer or winter daily construction-related criteria pollutant emissions from the proposed project for each phase of construction activities are shown below in Table 3-3; the CalEEMod daily printouts are shown in Appendix B of the Air Quality Study. Please note that the CalEEMod calculations are based on the description of the approximate construction phasing, duration and activity levels identified in Table 1, in the "description of project" subsection, in the first part of this Initial Study. Since it is possible that building construction/architectural coatings and paving and site improvement phases could overlap for short periods of time, Table 3-3 also shows the hypothetical "worst-case scenario" of complete overlap of all criteria pollutant emissions from those last two phases of construction.

Table 3-3 shows that none of the analyzed criteria pollutants, whether gaseous or particulate matter, would exceed the regional emissions thresholds during construction of the east boundary wall, demolition of buildings and other site improvements, grading and site preparation, or the combined emissions from potential temporary overlap of building construction/ architectural coatings, and paving/site improvements phases. The combined emission from those activities would represent the peak level of potential construction emissions. Therefore, a less-than-significant regional air quality impact would occur from construction of the proposed project. Please note that the calculations summarized in Table 3-3 are based on standard construction practices and also account for the dust-reducing benefits of twice daily watering of uncovered ground surfaces.

Construction-Related Regional Impacts

CalEEMod was used to calculate the construction-related regional emissions from the proposed project. This includes exhaust emissions from construction crew vehicles, dump trucks, bulldozers and other combustion-powered equipment, particulate matter generated during demolition, grading, and other ground disturbing activities, and gaseous compounds generated during application of paints and coatings to the warehouse structure and from asphalt and concrete paving. The input parameters utilized in this analysis are detailed in the Air Quality Study prepared for in this IS/MND. The worst-case summer or winter daily construction-related criteria pollutant emissions from the proposed project for each phase of construction activities are shown below in Table 3-3; the CalEEMod daily printouts are shown in Appendix B of the Air Quality Study. Since it is possible that building construction/architectural coating and paving/site improvement phases may overlap for periods of time, Table 3-3 also shows the hypothetical “worst-case scenario” of complete overlap of all combined criteria pollutant emissions from those last two phases of construction.

Table 3-3 – Construction-Related Regional Criteria Pollutant Emissions

Phase	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
1. East Boundary Wall Construction	1.67	21.32	10.58	0.04	0.96	0.72
2. Demolition	4.26	57.32	27.59	0.10	9.73	3.12
3. Grading	2.69	29.11	17.20	0.03	4.56	2.86
4. Building Construction/Architectural Coatings	33.60	30.37	29.45	.06	3.87	2.05
5. Paving and Site Improvements	1.72	15.30	15.38	0.02	0.99	0.81
Combined Building Construction/Architectural Coatings Plus Paving/Site Improvements	35.32	45.67	44.83	0.08	4.86	2.86
Highest Emission Levels, Any Phase or Combination of Phases	35.32	57.32	44.83	0.10	9.73	3.12
SCQAMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes:

¹ Demolition and grading emission based on standard construction practices in adherence with fugitive dust suppression requirements from SCAQMD Rule 403, i.e. watering uncovered ground areas twice a day.

² On-site emissions calculated for each phase from equipment not operated on public roads.

³ Off-site emissions calculated for each phase from passenger vehicles and trucks operating on public roads.

⁴ Paving/Site Improvements includes paving of parking and driveways, installation of landscaping and irrigation system, utility connections

Source: VISTA Environmental, October 2018.

As shown in Table 3-3, demolition phase activities would generate the highest level of NO_x and large particulate emissions of any of the individual construction phases, based on the type of equipment required, higher number of truck haul trips and worker trips, and the impacts that would occur across the entire site, versus portions of the site that would be affected by the other construction phases. Because there would be over 13,545 tons of waste materials generated during demolition that would need to be hauled away, this phase would generate the highest amount of truck trips, estimated at approximately 67 per day, for a total of nearly 1,340 truck trips over the four-week demolition phase. Grading emissions would be lower than demolition emissions because this phase is concentrated within the warehouse building footprint area rather than the entire site. Both of these phases would generate dust emissions from ground disturbance,

as well as gaseous emissions from the exhaust of a variety of diesel and gasoline-powered construction machinery and vehicles.

As noted in the project description, the proposed project would balance grading evenly on-site, with no import or export of soil material. As such, there would be no haul truck trips associated with the actual excavation. Modeling of construction phase air emissions did account for other types of haul trips. For example, for construction of the new east boundary wall, 20 concrete vendor truck trips were analyzed, along with 10 daily worker trips. For the demolition phase, 1,339 haul truck trips were assumed to transport 13,546 tons of waste building materials from the site, over the entire four-week demolition phase. In addition, there would be approximately 15 worker trips and 6 water truck trips per day. During the grading phase, 15 worker trips and 6 daily truck trips were assumed for water trucks arriving/departing the site. During the warehouse construction and architectural coating phase, it was assumed that there would be up to 58 vendor truck trips and 150 worker trips per day. In the final paving and site improvements phase, the modeling assumed 15 worker trips per day.

Table 3-3 shows that none of the analyzed criteria pollutants generated during construction, whether gaseous or particulate matter, would exceed the regional emissions thresholds during construction of the east boundary wall, demolition of buildings and other site improvements, grading, building construction/architectural coatings and paving/site preparation, or the combined emissions from potential temporary overlap of the last two phases. The combined emission from those last two phases would represent the peak level of potential construction emissions. Therefore, a less-than-significant regional air quality impact would occur from construction of the proposed project. Please note that the calculations summarized in Table 3-3 are based on standard construction practices and also account for the dust-reducing benefits of watering of uncovered ground surfaces twice a day.

Construction-Related Local Impacts

Construction-related air emissions may have the potential to exceed the state and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the SCAB.

The local air quality emissions from construction were analyzed through utilizing the methodology described in *Localized Significance Threshold Methodology* (LST Methodology), prepared by SCAQMD, revised October 2009. The LST Methodology found the primary criteria pollutant emissions of concern are NO_x, CO, PM₁₀, and PM_{2.5}. The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The Look-Up Tables include site acreage sizes of 1-acre, 2-acres and 5-acres. The *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, prepared by SCAQMD (2015), provides guidance on how to determine the appropriate site acreage size to utilize for a project. The Fact Sheet details the site acreage should be based on the maximum number of acres disturbed on the peak day of construction that is calculated on the construction equipment list utilized in the CalEEMod model, where crawler tractors, graders, and rubber tired dozers are all assumed to disturb 0.5 acre in an 8-hour day and scrapers are assumed to disturb 1.0 acre in an 8-hour day. Accordingly, each phase of construction was screened using the SCAQMD's Mass Rate LST Look-up Tables for a one-acre site, to determine whether a detailed analysis of local air quality impacts was required.

Table 3-4 shows the on-site emissions from CalEEMod for the different construction phases and the calculated localized emissions thresholds that were detailed in Table 3-2, above. Since it is possible that building construction, paving, and architectural coating phases could overlap to an extent, Table 3-4 also shows the combined local criteria pollutant emissions from these concurrent construction activities.

Table 3-4 – Construction-Related Local Criteria Pollutant Emissions – Prior to Mitigation

Phase	Pollutant Emissions (pounds/day) ¹			
	NO _x	CO	PM ₁₀	PM _{2.5}
1. East Boundary Wall Construction	19.2	9.60	0.73	0.65
2. Demolition ²	38.47	22.75	8.50	2.72
3. Grading ²	28.45	16.40	4.38	2.81
4. Building Construction/Architectural Coatings	23.86	20.31	1.72	1.44
5. Paving/Site Improvements ³	15.25	14.75	0.84	0.77
Combined Building Construction, Paving, Gravel Installation and Architectural Coatings	39.10	35.06	2.57	2.20
SCAQMD Thresholds for 25 meters (82 feet)⁴	91	664	5	3
Exceeds Threshold? ⁵	No	No	Yes	No

Notes:

¹The pollutant emissions in each row include 100% of the on-site emissions (off-road equipment and fugitive dust) and 1/8 of the off-site emissions (on road trucks and worker vehicles), to account for the on-road emissions that occur within 1/4 mile of the project site.

²Demolition and grading based on standard construction practices in adherence with minimum fugitive dust suppression requirements from SCAQMD Rule 403 (i.e., water uncovered ground areas twice a day).

³Includes paving of parking and loading areas and drive aisles, plus installation of landscaping, utility connections

⁴ The nearest sensitive receptor is a single-family home located adjacent to the east side of the project site, approximately 15 feet (4.6 meters) from the east property line. According to SCAQMD Methodology, all receptors closer than 25 meters from the project site boundary are based on the 25-meter threshold.

⁵ Highest daily emissions from each phase, plus combined emissions from last two phases were compared to SCAQMD daily thresholds

Source: VISTA Environmental, October 2018. Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for one acre in Air Monitoring Area 3, Coastal Southwest Los Angeles County.

The data in Table 3-4 shows the only exceedance of the localized thresholds, would be from PM₁₀ emissions during demolition activities. This would be considered a significant impact. Since the exceedance of the PM₁₀ LST is due to dust emissions, Mitigation Measure 3-1 will be imposed to require application of additional dust suppression measures identified by SCAQMD Rule 403, including watering all disturbed areas three times a day, applying chemical stabilizers on inactive areas, suspending grading activities when winds exceed 25 miles per hour, utilizing street sweepers at least once a day on adjacent streets to remove any dirt dropped by construction vehicles, and to schedule construction activities in accordance with special circumstance based SCAQMD directives. As discussed in the response to threshold b), in Section 9-Hazards, pursuant to SCAQMD Rule 1466, dust generation will be monitored and reported throughout the construction program. Table 3-5 demonstrates the benefits of Mitigation Measure 3-1, which reduces particulate emissions to below the applicable SCAQMD's recommended LST thresholds, resulting in a less than significant impact.

Mitigation Measure 3-1: The construction contractor shall:

- Water a minimum of three times daily to control dust during any activities that generate dust,
- Apply chemical soil stabilizers on inactive areas (i.e., disturbed areas within the site that are unused for four consecutive days) during grading operations,
- Suspend grading operations when wind speeds exceed 25 miles per hour,
- At least once a day during ground-disturbing activities, operate PM₁₀-efficient street sweepers or roadway-washing trucks on adjacent roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving or bringing materials, and
- Schedule construction activities in accordance with specific SCAQMD directives.

Table 3-5 – Mitigated Construction-Related Local Criteria Pollutant Emissions

Phase	Pollutant Emissions (pounds/day) ¹			
	NO _x	CO	PM ₁₀	PM _{2.5}
1. East Boundary Wall Construction	19.26	9.60	0.73	0.65
2. Demolition ²	38.47	22.75	4.91	2.17
3. Grading ²	28.45	16.40	2.76	1.98
4. Building Construction/Architectural Coatings	23.86	20.31	1.72	1.44
5. Paving/Site Improvements ³	15.25	14.75	0.84	0.77
Combined Building Construction/Architectural Coatings Plus, Paving/Site Improvements	39.10	35.06	2.57	2.20
SCAQMD Thresholds for 25 meters (82 feet)⁴	91	664	5	3
Exceeds Threshold? ⁵	No	No	No	No

Notes:

¹ The pollutant emissions in each row include 100% of the on-site emissions (off-road equipment and fugitive dust) and 1/8 of the off-site emissions (on road trucks and worker vehicles), to account for the on-road emissions that occur within 1/4 mile of the project site.

² Demolition and Grading emissions based on adherence to implementation of Mitigation Measure 3-1.

³ Includes paving of parking and loading areas and drive aisles, plus installation of landscaping, utility connections

⁴ The nearest sensitive receptor is a single-family home located adjacent to the east side of the project site, approximately 15 feet (4.6 meters) from the east property line. According to SCAQMD Methodology, all receptors closer than 25 meters from a project site boundary are based on the 25-meter threshold.

⁵ Highest daily emissions from each phase, plus combined emissions from last two phases were compared to SCAQMD daily thresholds. Demolition and Grading activities will not occur concurrently.

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for one acre in Air Monitoring Area 3, Coastal Southwest Los Angeles County.

Operational Emissions

The ongoing operation of the proposed project would result in a long-term increase in air quality emissions. Sources of operational emissions include “area sources” (i.e., the application of architectural coatings, which are assumed to be 10 percent of the paintable space per year and consumer products, energy consumption, on-road traffic exhausts, and possibly a small amount of emissions from on-site mobile equipment powered by combustion engines). The primary source of project-related emissions is attributed to the increase in exhaust emissions from the project's trucks and passenger vehicles and through operational emissions from the ongoing daily activities by the warehouse/distribution businesses occupying the project site. As noted in the Project Description in the beginning of this Initial Study, the proposed 203,877-square-foot building would support warehouse and distribution businesses that could operate 24 hours a day, 7 days a week. As described in the Project Description, the warehouse would not be a cold storage warehouse and would not function as a high-cube warehouse. Warehouse operations would include arrivals and departures of trucks and passenger vehicles, activities at 21 truck loading bays, and occasional site maintenance and trash pick-up. No outdoor storage or other outdoor activities are proposed, nor any industrial processes that could produce air emissions as a by-product. There could be one or multiple tenants and the numbers of employees could vary, depending on the ultimate types of tenants. Total traffic generation for this analysis is based on the estimated daily trip generation of 357 daily trips (283 passenger vehicles and 74 truck trips) identified in the Traffic Impact Study prepared for this project, which is discussed in detail in Section 17. As noted below, CalEEMod was used to estimate operational emissions, including separate inputs related to passenger vehicles trips and truck trips but one set of output for mobile sources. Conservatively, the analysis of criteria pollutants during operations does not take credit for PDF 3-4, which prohibits onsite forklifts and other off-road equipment during operations (i.e., non-construction) from being powered by diesel fuel.

San Pedro Bay Ports Clean Air Action Plan

Given the project site's very close proximity to the Port of Los Angeles and the Port of Long Beach (the "Ports"), it is anticipated that many of the trucks utilizing the Project's warehouse facility will be driving to or from the Ports. As described below, the Ports have adopted strict emission standards for trucks accessing the Ports, therefore the trucks going to and from the Project's warehouse will include some of the cleanest trucks commercially available today.

Both Ports are governed by the San Pedro Bay Ports Clean Air Action Plan which establishes regulations for reducing air pollution emissions from cargo movement in and around the Ports. Since the adoption of the original Clean Air Action Plan in 2006, diesel particulate emissions from mobile sources in and around the Ports are down 87%.

A fundamental component of the Clean Air Action Plan is the Clean Truck Program, which applies to all trucks accessing the Ports. The Clean Truck Program was updated in 2017 with new emissions standards for trucks that are allowed to enter the Ports. Those truck regulations, which went into effect in 2018, require that new trucks entering the Ports' Truck Registry must have a 2014 engine model year or newer. Trucks with 2014 model year engines provide the current cleanest engine emissions level coupled with on-board diagnostics to assist in maintaining that level. The Clean Truck Program also requires that, beginning in early 2020, following promulgation of California's near-zero-emission heavy-duty engine standard, all heavy-duty trucks will be charged a fee to enter the Ports' terminals, with exemptions for trucks that are certified to meet this near-zero standard or better. Under the previous Clean Trucks Program, which imposed a fee on older trucks, roughly 90% of the trucks were replaced within three years with cleaner models while 10% chose to pay the fee in the short term. Thus, the assessment of the truck fee could result in a significant turnover to near-zero-emissions trucks in the near-term. The Ports project that by 2024, as a result of the truck rate starting in 2020 and the 2023 requirement for any new trucks entering the service, near-zero-emission trucks could comprise roughly 70% to 90% of the Ports' truck fleet. To support the goal of ultimately transitioning to a zero-emission truck fleet in 2035, the truck fee implemented initially in 2020 will gradually be modified so that by 2035 it will only provide exemptions for trucks that are certified by the state to meet zero-emissions specifications.

As a result, trucks going between the project site and the Ports will be required to meet strict emission standards not normally applicable to trucks. Additionally, warehouses in close proximity to the Ports – such as the Project site – are also environmentally beneficial by reducing the number of miles trucks have to travel from the Ports to unload cargo for local destinations.

The following section analyzes the potential long-term air quality impacts resulting from the ongoing operations of the proposed project. No credits have been applied for potential emissions reductions resulting from the Clean Truck Program described above.

Operations-Related Regional Criteria Pollutant Analysis

The operations-related criteria air quality impacts created by the proposed project have been calculated with CalEEMod; and analyzed by Vista Environmental and includes several input parameters that are detailed in Appendix B -Air Quality, Greenhouse Gas, and Health Risk Assessment of this IS/MND. The worst-case summer or winter VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} daily emissions created from the proposed project's long-term operations have been calculated and are summarized below in Table 3-6. The CalEEMod daily emissions printouts are provided in Appendices B and C of the Air Quality Study.

Table 3-6 – Operational Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area Sources ¹	4.62	0.00	0.02	0.00	0.00	0.00
Energy Usage ²	0.02	0.22	0.18	0.00	0.02	0.02
Mobile Sources ³	1.29	20.39	13.46	0.08	3.68	1.10
Off-Road Equipment ⁴	0.48	4.28	3.58	0.00	0.33	0.31
Total Emissions	6.41	24.89	17.24	0.08	4.03	1.43
SCQAMD Operational Thresholds	55	55	550	150	150	55
Exceeds Threshold?	NO	NO	NO	NO	NO	NO

Notes:

¹ Area sources consist of emissions from consumer products, architectural coatings applied during routine building maintenance (assumed to be 10% of total paintable area per year), and landscaping equipment.

² Energy usage consist of emissions from natural gas usage (excluding hearths), per CalEEMod default settings, even though the project does not propose to install natural gas service. Factors based on surveys of consumer energy consumption conducted by the California Energy Commission. It should be noted that CalEEMod version that was developed in coordination with the SCAQMD only accounts for the on-site electricity usage for the GHG emissions analysis and not the criteria pollutant analysis, since the majority of the electricity utilized in the SCAB is generated outside of the SCAB and therefore would not impact the basin's air quality.

³ Mobile sources consist of emissions from on-road passenger vehicles and trucks and road dust.

⁴ Off-road equipment consists of emissions from possible diesel forklifts utilized on-site (conservative hypothetical estimate, since PDF 3-4 would prohibit use of diesel-powered off-road mobile equipment).

Source: Calculated from CalEEMod Version 2016.3.2.

The data in Table 3-6 shows that none of the analyzed criteria pollutants NO_x, CO, PM₁₀, and PM_{2.5}) would exceed the regional emissions thresholds. Therefore, regional air quality impacts would be less than significant from operation of the proposed project.

Operations-Related Local Air Quality Impacts

Project-related air emissions may have the potential to exceed the state and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the SCAB. The proposed project has been analyzed for the potential local CO emission impacts from the project-generated trucks and passenger vehicle trips and from the potential local air quality impacts from on-site operations and for potential LST impacts during operations. The following analyzes the vehicular CO emissions and local LST impacts from on-site operations.

Local CO Hot Spot Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the state and federal CO standards of 20 parts per million (ppm) over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the air basin and in the state have steadily declined. In 2007, the air basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the four of the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation

of CO standards.² Since the intersections impacted by the proposed project are much smaller and carry much less traffic than what was analyzed by the SCAQMD, no local CO hot spots are anticipated to be created from the proposed project, and no CO hot spot modeling was performed. Therefore, a less-than-significant long-term air quality impact due to CO concentrations would occur with the ongoing use of the proposed project.

Local Criteria Pollutant Impacts from On-site Operations

Project-related air emissions from on-site sources such as architectural coatings applied during routine building maintenance (assumed to be 10% of total paintable area per year), landscaping equipment, consumer products, and potential on-site usage of natural gas appliances³ could create emissions that exceed the state and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the air basin.

The local air quality emissions from on-site operations were analyzed using the SCAQMD's Mass Rate LST Look-up Tables and the methodology described in LST Methodology. Table 3-7 shows the on-site emissions from CalEEMod that includes area sources, energy usage, and vehicles operating in the immediate vicinity of the project site and the calculated emissions thresholds.

Table 3-7 – Operations-Related Local Criteria Pollutant Emissions

On-site Emission Source	Pollutant Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area Sources	0.00	0.02	0.00	0.00
Energy Usage	0.22	0.18	0.02	0.02
On-site Vehicle Emissions ¹	2.82	1.80	0.50	0.15
Off-Road Equipment ²	4.28	3.58	0.33	0.31
Total Emissions	7.05	5.46	0.81	0.47
SCAQMD LST Thresholds for 25 meters (82 feet)³	197	1,796	4	2
Exceeds Threshold?	NO	NO	NO	NO

Notes:

¹ On-site vehicle emissions based on 1/8 of the gross vehicular emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the project site.

² Emissions from off-road equipment were calculated assuming diesel forklifts utilized on-site. PDF 3-4 will prohibit any diesel-powered off-road equipment and require that all such equipment be powered by batteries or non-diesel fuels (e.g., propane) that do not result in diesel emissions.

³ The nearest sensitive receptors are single-family homes located adjacent to the east side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 5 acres in Air Monitoring Area 3, Coastal Southwest Los Angeles County.

² The four intersections analyzed by the SCAQMD were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning and LOS F in the evening peak hour.

³ The proposed project does not include connections to natural gas service; however, future tenants may elect to make such a connection and this potential emission source was included in the modeling. Also, the proposed project does not include any emergency power generators; therefore, no emissions were modeled from that source.

The project-generated emission levels shown in Table 3-7 indicate that the fully developed and operational project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} LST thresholds of significance discussed above. Therefore, the proposed project would create a less-than-significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

c) *Less Than Significant Impact.*

The SCAB is out of attainment for ozone, PM₁₀, and PM_{2.5}. In accordance with CEQA Guidelines Section 15130(b), this analysis of cumulative impacts incorporates a three-tiered approach to assess cumulative air quality impacts.

- Consistency with the SCAQMD project-specific thresholds for construction and operations;
- Project consistency with existing air quality plans; and
- Assessment of the cumulative effects of the pollutants.

Consistency with Project-Specific Thresholds

Construction-Related Impacts

As previously discussed, the project site is in the SCAB, which is currently designated by the USEPA for federal standards as a non-attainment area for ozone and PM_{2.5} and by the California Air Resources Board (CARB) for state standards as a non-attainment area for ozone, PM₁₀, and PM_{2.5}. The regional ozone, PM₁₀, and PM_{2.5} emissions associated with construction of the proposed project are presented in Table 3-3 above and show that less than significant regional emissions of VOC and NO_x (ozone precursors), PM₁₀, and PM_{2.5} would occur during construction of the proposed project. Therefore, a less-than-significant cumulative impact would occur from construction of the proposed project. It is also noted that there are no other proposed projects in the project vicinity and thus no other potential sources of construction period impacts that could combine with the project's temporary local construction emissions.

Operational-Related Impacts

In accordance with SCAQMD methodology, projects that do not exceed SCAQMD's recommended significance thresholds or can be mitigated to less-than-significant levels at a project level do not contribute a cumulatively considerable level of emissions on a regional basis. The regional ozone, PM₁₀, and PM_{2.5} emissions created from the ongoing operations of the proposed project are shown in Table 3-6 and identify that operation of the proposed project would result in less than significant regional emissions of VOC and NO_x (ozone precursors), PM₁₀, and PM_{2.5}. As such, project operations would create a less-than-significant cumulative impact on air quality in the SCAB.

Consistency with Air Quality Plans

As discussed under item a), the project site is currently designated as IL in the General Plan and is zoned MPD. The proposed warehouse/distribution project is consistent with the County's land use policies and development standards and would not require a General Plan Amendment or zone change. Since the long-range emissions forecasts in the AQMP are based on growth envisioned in the RTP/SCS, which is informed by local general plans including the Los Angeles County General Plan, the proposed project would not result in an exceedance of the AQMP assumptions regarding growth or emissions for the project area and is found to be consistent with the AQMP for the SCAB.

Cumulative Impacts

The SCAB is designated as nonattainment for ozone, PM₁₀, and PM_{2.5}, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (elderly, children, and the sick). Therefore, when the concentrations of those pollutants exceed the standard, it is likely that some sensitive individuals in the population would experience health effects. The regional analysis detailed in threshold b) found that the proposed project would not exceed the SCAQMD regional significance thresholds for VOC and NO_x (ozone precursors), PM₁₀, and PM_{2.5}. It is not practical or feasible to attempt a region-wide quantitative assessment of all potential new pollution sources, at any given point in time, to determine the precise quantitative contribution of an individual land use project as an element of the total combined emissions from hundreds of proposed new development, infrastructure, community facilities, etc. that are occurring throughout the air basin. Therefore, the SCAQMD thresholds were established as indicators of a cumulatively considerable contribution to an existing or potential violation of health-based air quality standards.⁴ In accordance with SCAQMD methodology, projects that do not exceed SCAQMD's recommended significance thresholds or can be mitigated to less-than-significant levels at a project level do not contribute a cumulatively considerable level of emissions on a regional basis. As previously discussed in the response to item b), the project's emissions would be below all SCAQMD regional thresholds for the non-attainment pollutants; therefore, the proposed project would not result in a cumulatively considerable contribution of these pollutant emissions within the SCAB either during construction or operation of the project. Moreover, the proposed project would not result in exceedances of the SCAQMD's LST standards during construction or operations.

Among the key objectives of the regional AQMP is the achievement of attainment status for those criteria pollutants for which the region is currently out of attainment. The various pollution control strategies set forth in the AQMP are designed to reduce regional emissions of those pollutants over time, with ongoing regional growth as forecast in the SCS/RTP. The AQMP control strategies take into account population growth and economic development within the region, including new land development projects, such as the proposed project, with the purpose of reducing regional emissions to achieve attainment status for the four criteria pollutants that are currently in a non-attainment status.

- d) ***Less Than Significant Impact with Mitigation Incorporated.*** The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed project, which may expose sensitive receptors to substantial concentrations, have been calculated for both construction and operations and are detailed in Tables 3-4 and 3-6 above, which show that the proposed project emissions are below the SCAQMD LST thresholds and local impacts will be less than significant.

Construction-Related Sensitive Receptor Impacts

Construction of the proposed project may expose sensitive receptors to substantial localized criteria pollutant concentrations and from TAC emissions created from on-site construction equipment, which are described below.

⁴ SCAQMD "uses the same significance thresholds for project specific and cumulative impacts." "Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same." SCAQMD, 2003, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, p. D-3. Available here: <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2> and on the SCAQMD's CEQA Air Quality Analysis Handbook website under the heading "Cumulative Impacts Emission Analysis" (see here: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>).

Local Criteria Pollutant LST Impacts from Construction

Analysis of local air quality impacts from construction of the proposed project indicated that the construction of the proposed project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} LST thresholds of significance with mitigation incorporated (see Table 3-3). Therefore, construction of the proposed project would create a less-than-significant construction-related localized air quality impact and no additional mitigation would be required. It is also noted that there are no other proposed projects in the project vicinity and thus no other potential sources of construction period impacts that could combine with the project's temporary local construction emissions.

Toxic Air Contaminants Health Risk Impacts from Construction

The greatest potential for TAC emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." "Individual cancer risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes and requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment and by January 2023 no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets, which become more stringent each year between years 2014 and 2023.

Given the short duration of the construction schedule, no significant short-term TAC impacts are anticipated to occur during construction of the proposed project. Nonetheless, the project has committed to PDF 3-1 and PDF 3-2, which require use of Tier 4 construction equipment and trucks with a 2010 model year or newer, as follows:

Project Design Feature 3-1. Off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 4 off-road emission standards. A copy of each unit's certified tier specification shall be available for inspection by the County at the time of mobilization of each applicable unit of equipment.

Project Design Feature 3-2. All diesel-fueled trucks accessing the project site during construction shall meet the USEPA / California Air Resource Board truck engine standard for Model Year 2010 or better. In the event that 2010 model year or newer diesel haul trucks cannot be obtained, use trucks that meet EPA 2007 model year NO_x requirements, at a minimum.

Use of Tier 4 equipment will substantially reduce DPM emissions during construction compared to using earlier engines. Given the short duration of the construction schedule, along with the application of PDF 3-1 and PDF 3-2, construction of the proposed project would result in a less-than-significant exposure of sensitive receptors to TACs and health risks from construction activities would be less than significant.

Operations-Related Sensitive Receptor Impacts

The ongoing operations of the proposed project may expose sensitive receptors to substantial pollutant concentrations of local CO emission impacts from the project-generated trucks and passenger vehicle trips, to potential local air quality impacts from criteria pollutants resulting from on-site operations, and to health risks from onsite TACs emissions. The following analyzes the vehicular CO emissions, local criteria pollutant impacts from on-site operations, and health risks from onsite TAC emissions.

Local CO Hot Spot Impacts from Project-Generated Vehicle Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. As discussed under item b) above, no local CO hot spots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the proposed project. Therefore, operation of the proposed project would result in a less-than-significant exposure of off-site sensitive receptors to substantial pollutant concentrations associated with the project's traffic emissions.

Local Criteria Pollutant LST Impacts from On-site Operations

The local air quality impacts from the operation of the proposed project would occur from on-site sources such as architectural coatings during routine building maintenances (assumed to be 10 percent of total paintable area per year), landscaping equipment, consumer products, and on-site usage of natural gas appliances. As previously discussed, the operation of the proposed project would not exceed the local NO_x, CO, PM₁₀, and PM_{2.5} LST thresholds of significance. Therefore, the ongoing operations of the proposed project would not result in a significant impact on local air quality and no mitigation would be required.

Operations-Related Toxic Air Contaminant Health Risk Impacts

The proposed project would consist of the development of a warehouse facility and related parking facilities. Operation of the proposed project would generate diesel emissions, which are known sources of TACs, from truck traffic and delivery trucks, and from any diesel-powered off-road equipment, such as forklifts and parking lot sweepers. DPM is the primary source of TACs from project operations. Health risks from TACs are two-fold. First, TACs are classified as carcinogens by the State of California. Second, short-term acute and long-term chronic exposure to TACs can cause adverse health effects to the respiratory system.

Health Risk Modeling Methods and Assumptions

The project's TAC emissions were quantitatively assessed to evaluate the potential for significant health risks affecting neighboring sensitive receptors, including the single-family homes to the east, north, and south of the project site. This analysis is based on the recommended methodology described in *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel idling Emissions for CEQA Air Quality Analysis* (SCAQMD HRA Guidance), prepared by SCAQMD, 2003 and *Air Toxics Hot Spots Program Risk Assessment Guidelines* (OEHHA Guidelines), prepared by Office of Environmental Health Hazard, February 2015, and *Risk Assessment Procedures for Rules 1401, 1401.1 and 212* (SCAQMD Risk Assessment Procedures), prepared by SCAQMD, September 1, 2017. The AERMOD View Version 9.7.0 Model was used for all dispersion modeling. AERMOD is the SCAQMD-recommended air dispersion model that is commonly used within the SCAB.

Important issues that affect the dispersion modeling include the following: 1) Model Selection, 2) Source Treatment, 3) Meteorological Data, and 4) Receptor Grid. Key dispersion modeling options selected included the regulatory default options and urban modeling option for Los Angeles County. Meteorological data from the SCAQMD's Hawthorne Airport monitoring site was selected for this modeling application since this is the nearest monitoring site with meteorological data available to the project site. Five full years of sequential meteorological data were collected at the Hawthorne Station by the SCAQMD for 2012, 2013, 2014, 2015, and 2016. The SCAQMD processed the data for input to the model.

The nearest sensitive receptors that may be impacted by the proposed project are the single-family homes located adjacent to the eastern side of the project site, single-family homes located approximately 70 feet west of the project site on the west side of Normandie Avenue, and multi-family homes and single-family homes located as near as 110 feet north of the project site on the north side of Torrance Boulevard. Discrete receptors were placed at 10 representative nearby homes immediately north, east and west of the project site. Moreover, to conservatively evaluate potential health risks beyond the 10 representative homes, potential receptors were evaluated out to 500 meters (1,640 feet) using a grid receptor system, as shown on Figure 3.⁵

Project-Related Truck Emissions

According to the Traffic Impact Analysis, the proposed warehouse would generate 74 truck trips per day (37 truck deliveries per day). The 74 total truck trips per day would consist of 13 two-axle truck trips, 17 three-axle truck trips, and 44 trips by trucks with four or more axles. The project-related truck emissions have been analyzed separately for truck travel and truck idling that utilized emission rates from the EMFAC model. Although the project will not be a cold storage warehouse, in order to provide a conservative analysis based on the potential that some diesel transport refrigeration units (TRUs) may utilize the project site even though the project will not be a cold storage warehouse, it was assumed that 20 percent of all truck trips to the proposed warehouse would have operational TRU units. Truck emissions were analyzed based on the restriction of site access by trucks via the Normandie Avenue driveway only in accordance with PDF 3-3.

Project Design Feature 3-3. Trucks during project operations shall be limited to using the Normandie Avenue driveway.

EMFAC Model

The truck travel and truck idling emission rates were obtained from the EMFAC2014 model Version 1.0.7. The EMFAC2014 model is the latest emissions inventory model released by CARB that calculates motor vehicle emissions from vehicles operating on roads in California. The EMFAC2014 includes the latest data on California's car and truck fleets and travel activity and also reflects the emissions reductions associated with CARB's recent rulemaking, including on-road diesel fleet rules, Advanced Clean Car Standards, and the Smartway/Phase I Heavy-Duty Vehicle GHG Regulations.

The EMFAC model was run for calendar years 2019 through 2049. The EMFAC model run was based on the SCAB portion of Los Angeles County and modeled the Truck 1 and Truck 2 vehicle categories in the EMFAC model. The Truck 1 category covers all truck classifications between 8,500 and 14,000 pounds and was utilized to analyze the 2-axle truck trips. The Truck 2 category covers all truck classifications over 14,000 pounds and was utilized to analyze the 3-axle and 4+-axle truck trips. Since vehicle emission factors are dependent on vehicle speed, emission factors were obtained for 10 and 35 miles per hour and idling rates.

⁵ Please refer to Figure 3, AERMOD Model Sources and Receptor Placement and Table R of Appendix B of this Initial Study.

Truck Travel

The onsite diesel truck travel was modeled based on restricting the truck access to the Normandie Avenue driveway pursuant to PDF 3-3, to and from the loading area. Offsite truck travel was modeled for Normandie Avenue north and south of Torrance Boulevard and south of the proposed driveway in the southwest corner of the project site. According to the Traffic Impact Analysis, the project-related truck traffic entering and exiting the site would be distributed along the local roadways as follows: on Normandie Avenue, 5 percent would arrive/depart from/to the south and 95 percent would arrive/depart from/to the north to enter/exit the project's Normandie Avenue driveway. Off-site truck travel was also modeled for Torrance Boulevard west and east of the Normandie Avenue and east of the proposed driveway in the northeast corner of the project site. According to the Traffic Impact Analysis, of the total project-related truck traffic, 90 percent would arrive/depart via Torrance Boulevard, with 5 percent arriving/departing from west of Normandie Avenue and 85 percent from east of Normandie Avenue.

The emission rates utilized in the AERMOD model were calculated by converting the emissions created for one truck to grams per second and then calculating the time it takes to travel the road length and multiplying this time by the number of truck trips per day and then dividing by 24 hours. The diesel truck line volume source truck routes were modeled with a six-foot exhaust release height and 12-foot width for the on-site driveways and a 40-foot roadway width on Normandie Avenue and Torrance Boulevard.

Onsite Truck Idling

The on-site diesel truck idling emissions were modeled as a point source located in the center of the loading area on the south side of the proposed warehouse. The analysis was based on each truck delivery idling on the project site for 15 minutes or 5 minutes for arriving to the loading area, 5 minutes for leaving the loading area, and 5 minutes for idling at the loading area. The 5-minute period is based on Section 2485 of the California Code of Regulations that limits commercial truck idling to 5 minutes at any location. The emission factors used for the truck idling point source was based on the EMFAC2014 idling emission rates.

Transport Refrigeration Units

Although the project will not be a cold storage warehouse, in order to provide a conservative analysis based on the potential that some diesel TRUs may utilize the project site even though the project will not be a cold storage warehouse, it was assumed that 20 percent of all truck trips to the proposed warehouse would have operational TRU units. The TRUs operating at the proposed warehouse have been modeled as operating for 30 minutes per delivery.

The TRU emissions were calculated through use of the diesel particulate matter (DPM) emission rates provided in the OFFROAD2011 Emissions Summary, Attachment D, prepared by CARB (August 2011), which provides DPM average emission rates from TRUs in California for the years 2012 to 2040 in grams per brake horsepower-hour. The years 2041 to 2048 were based on the year 2040 emission factors. This report also details that the average horsepower of TRUs is 34 horsepower and the load factor is 0.53. Per field observations of TRU units it was also determined that they typically operate at an on/off cycle factor of 0.5.

In accordance with current SCAQMD modeling preferences, the TRU emissions have been analyzed in the AERMOD model as a point source located in the middle of the loading area on the south side of the proposed warehouse. The TRU point source was analyzed based on each TRU operating onsite for 30 minutes per truck delivery, a release height of 12 feet, a gas exit temperature of 501°K, a stack inside diameter of 0.04 meter, and an exit velocity of 50 meters per second.

Off-Road Diesel Equipment

The operation of the proposed warehouse may require the use of diesel powered-forklifts or other off-road diesel equipment operating on the project site. As detailed above in the criteria pollutant analysis, the

primary activity that would require the use of off-road diesel equipment would be associated with diesel forklifts unloading/loading of truck deliveries. According to the Traffic Impact Analysis, the proposed project would generate 37 truck deliveries per day. Based on 30 minutes of unloading/loading activities per delivery, this would result in 18.5 hours of forklift activities per day. As indicated in the Project Description, the project will not be a cold storage warehouse and will not function as a high-cube warehouse. In order to account for the use of other off-road diesel equipment onsite, it has been assumed that off-road equipment would operate a combined total of 24 hours per day or three pieces of equipment operating 8 hours per day.

The DPM emissions factors for the off-road equipment were obtained from the OFFROAD2011 model, which provides PM average emission rates from all non-electric powered forklifts in the SCAB for each year up to the year 2029. The years 2030 to 2048 were based on the year 2029 emission factors. The OFFROAD2011 model results also details that the average horsepower of forklifts is 89 horsepower. It should be noted that a test OFFROAD2011 model run of an average of all industrial equipment found that the average horsepower of all industrial equipment 85 horsepower, so the use of forklifts is more conservative than the use of an average of all industrial equipment. The load factor of 0.20 was utilized and is based on the default load factor for forklifts utilized in the CalEEMod model.

In accordance with current SCAQMD modeling preferences, the off-road equipment have been analyzed as a point source in AERMOD model based on three forklifts operating for 8 hours each or a total of 24 hours per day, a release height of 6 feet, a gas exit temperature of 501°K, a stack inside diameter of 0.04 meter, and an exit velocity of 50 meters per second (170 feet per second).

Cancer Risks

In order to determine the Air Basin-wide risks associated with major airborne carcinogens, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES) studies. According to the SCAQMD's MATES-IV study, the project site has an estimated cancer risk of 1210 per million persons chance of cancer. In comparison, the average cancer risk for the Air Basin is 991 per million persons, which is based on the use of age-sensitivity factors detailed in the State of California, Office of Environmental Health Hazards (OEHHHA) Guidelines (OEHHHA, 2015). The increased cancer risk is primarily due to the project site's proximity to both State Route 213 and Route 110, which are both significant sources of DPM from truck emissions.

In order to provide a perspective of risk, it is often estimated that the incidence in cancer over a lifetime for the U.S. population ranges between 1 in 3 to 4 and 1 in 3, or a risk of about 300,000 per million persons. The MATES-III study referenced a Harvard Report on Cancer Prevention, which estimated that of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures that includes hazardous air pollutants. The OEHHHA Guidance includes a complex formula to calculate cancer risk, which was used in the preparation of this impact analysis and is included in the Health Risk Assessment presented in section 9.5 of Appendix B (Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis) prepared for this IS/MND. Among other factors, the formula considers distance to receptor, age (which may be weighted for greater sensitivity, i.e., infants), and time at home. The OEHHHA guidance recommends that Age Sensitivity Factors be utilized for residential receptors, which includes a 10-fold multiplier to infants (3rd trimester to age 2), a 3-fold increase in exposure for children (ages 2 to 16 years old), and an exposure factor of 1 for ages 16 and older. The OEHHHA guidance also recommends separate breathing rates for each age group and the SCAQMD Risk Assessment Procedures recommends utilizing the 95th percentile breathing rates for the 3rd trimester to 2 years and the 80th percentile breathing rates for all older persons. The 95th percentile breathing rates for 3rd trimester is 361 and for 0 to 2 years is 1,090. In order to simplify the analysis, the 3rd trimester and 0

to 2 year breathing rates were time-weighted averaged together, which resulted in a breathing rate of 1,009. The 80th percentile breathing rate for 2 to 16 years is 572 and for 16 to 30 years is 261.

As noted earlier, a primary potential source of these emissions would be from diesel-fueled forklifts and possibly other on-site mobile equipment, such as a street sweeper. However, PDF 3-4 prohibits the project from using diesel-powered forklifts or other off-road equipment during project operations, as follows:

Project Design Feature 3-4: Prior to issuance of a Certificate of Occupancy, the permittee/applicant shall provide verification that tenant leases or covenants recorded with any future ownership changes shall require all off-road diesel equipment (non-street legal), such as forklifts and street sweepers, that are used onsite and indoors only during project operations (i.e., non-construction) to be powered by alternative fuels, electrical batteries or other non-diesel fuels (e.g., propane) that do not result in diesel particulate emissions.

Based on PDF 3-4, forklifts or other off-road equipment will use a non-diesel fuel source, which eliminates the potential for emissions of DPM, which is the primary source of health risks associated with forklifts and other off-road equipment. As such, the use of forklifts and other off-road equipment during operations is not included in the health risk analysis. Other contribution of TACs would result from the short movements of large trucks as they arrive, move into and out of the loading bays, and depart the site. Daily levels of TACs from sources of diesel particulate matter were calculated with the methodology and assumptions described above. Results are summarized in Table 3-8, below.

Table 3-8 – TAC Cancer Risks at Nearby Sensitive Receptors

Sensitive Receptor	Receptor Description ¹	Receptor Location		Annual PM ₁₀ Concentration (µg/m ³)			Cancer Risk Per Million People
		X	Y	2019-2021	2022-2036	2037-2048	
1	SFH to east	380,017	3,745,364	0.0048	0.0021	0.0009	2.4
2	SFH to east	380,016	3,745,329	0.00794	0.00324	0.0015	3.9
3	SFH to east	380,015	3,745,299	0.0092	0.0038	0.0017	4.6
4	SFH to east	380,025	3,745,251	0.0079	0.0039	0.0015	4.2
5	SFH to west	379,780	3,745,242	0.0032	0.0018	0.0006	1.8
6	SFH to west	379,780	3,745,297	0.002	0.0013	0.0005	1.3
7	SFH to west	379,781	3,745,360	0.0024	0.0013	0.0005	1.3
8	SFH to north	379,933	3,745,404	0.0030	0.0013	0.0006	1.5
9	SFH to north	379,971	3,745,405	0.0029	0.0013	0.0006	1.5
10	SFH to north	380,003	3,745,405	0.0033	0.0014	0.0006	1.7
Threshold of Significance							10
Exceed Threshold?							No

Notes:

¹ SFH = Single-Family Home

Source: Calculated from ISC-AERMOD View Version 9.7.0. All calculation worksheets are provided in the appendices of the Air Quality Study, Appendix B of this Initial Study.

As shown above, the maximum added cancer risk from the project's diesel emissions sources would be 4.6 in one million, at one of the single-family residences immediately east. All other locations analyzed would be at lower health risk levels. All of the calculated added cancer risks at the surrounding sensitive receptors would be below the SCAQMD threshold of ten in one million; therefore, the project impact would be less than significant, and no additional mitigation measures are required.

Non-Cancer Risks

In addition to the cancer risk from exposure to TAC emissions, there is also the potential that TAC exposure may result in adverse health impacts from acute and chronic illnesses, which are detailed below.

Chronic Health Impacts

Chronic health effects are characterized by prolonged or repeated exposure to a TAC over many days, months, or years. Symptoms from chronic health impacts may not be immediately apparent and are often irreversible. The chronic hazard index is based on the most impacted sensitive receptor from the proposed project and is calculated from the annual average concentrations of PM₁₀. The relationship for non-cancer chronic health effects is an expression of the annual average DPM concentration in relation to the reference exposure level (REL);⁶ this relationship is referred to in terms of a chronic hazard index, as defined by OEHHA. The OEHHA criterion for significance is a chronic hazard index increase of 1.0 or greater; the REL for the project is 0.00224 for DPM.⁷ Therefore, the daily activities of the proposed warehouse project would result in a less-than-significant impact involving a non-cancer chronic health risk from TAC emissions.

Acute Health Impacts

Acute health effects are characterized by sudden and severe exposure and rapid absorption of a TAC. Normally, a single large exposure is involved. Acute health effects are often treatable and reversible. The acute hazard index is calculated from the maximum 24-hour concentrations of PM₁₀ at the point of maximum impact, which has been calculated with AERMOD with the parameters as discussed in the Air Quality Study and summarized earlier herein. The relationship for non-cancer acute health effects is an expression of the maximum hourly concentrations of PM₁₀ in relation to the acute reference exposure level (AREL).

No acute risk has been found to be directly created from DPM, so there is no AREL assigned to DPM. To provide an DPM-equivalent AREL, the ARELs from all of the other TACs that are emitted in diesel exhaust were added together based on their diesel weighting. This resulted in a diesel emission-weighted equivalent AREL of 2,189 micrograms per cubic meter (µg/m³). AERMOD found that the highest 24-hour concentration at the point of maximum impact is 0.3158 µg/m³ for DPM equivalent acute non-cancer risk emissions. The OEHHA criterion for significance is an acute hazard index increase of 1.0 or greater. Therefore, the daily activities of the proposed project would result in a less-than-significant impact involving a non-cancer acute health risk from TAC emissions.

- e) ***Less Than Significant Impact.*** Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

⁶ The reference exposure level is the concentration level at or below which no adverse health effects are anticipated for a specified exposure duration.

⁷ The hazard index (H_{DPM}) is a factor calculated through the following equation: C_{DPM} / REL_{DPM}. Please refer to Appendix B of this Initial Study for further explanation.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality; this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints, and solvents, and from emissions from diesel equipment. The objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries, since the chemical concentrations that produce the odors dissipate quickly with distance. There are also SCAQMD rules that limit the amount of volatile organic chemicals within paints and other coatings that help reduce the intensity of odors from those sources. Due to the temporary and highly localized nature of construction odors, a less-than-significant odor impact would occur, and no mitigation would be required.

Operations-Related Odor Impacts

The proposed project would consist of the development of a warehouse facility. Except for the loading activities at the docks on the rear of the building, there would be no sources of odors from regular business activities associated with the warehouse itself since all other activities would occur inside the building. Potential sources that may emit odors during the ongoing operations of the proposed project include the trash storage area and possibly combustion-powered maintenance equipment. Pursuant to County regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Any odors produced by small combustion-powered maintenance equipment would be insignificant, as these would be intermittent, very temporary, and would disperse quickly and in the immediate vicinity of the activity. Diesel truck emissions odors would be generated intermittently from truck loading and unloading activities at the project site and due to rapid dissipation of those emissions, would not likely be noticeable for extended periods of time beyond the project site boundaries. With off-road mobile equipment, such as forklifts and street sweepers restricted to those powered by clean fuels or batteries, there would be no odors associated with any diesel or gasoline powered machinery of that type. Through compliance with SCAQMD's Rule 402,⁸ no significant impact related to odors would occur during the ongoing operations of the proposed project. Therefore, a less-than-significant odor impact would occur, and no mitigation would be required.

References:

Office of Environmental Health Hazard Assessment. 2016. OEHHHA Acute, 8-hour and Chronic Reference Exposure Level (REL) Summary. Accessed March 13, 2018. <https://oehha.ca.gov/air/general-info/oehha-acute-8-hour-and-chronic-reference-exposure-level-rel-summary>.

⁸ SCAQMD Rule 402 states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Vista Environmental. 2018. Air Quality, Greenhouse Gas Emissions, and Health Risk Impact Assessment for the Bridge Point South Bay II Warehouse Project.

_____. 2019. Updates to the AERMOD Modeling provided in the Bridge Point South Bay Ii Warehouse Project Air Quality Report.

<http://www.cleanairactionplan.org/documents/2017-clean-air-action-plan-update-fact-sheet-10-23-17.pdf/>

<http://www.cleanairactionplan.org/documents/final-2017-clean-air-action-plan-update.pdf/>

4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally or state protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States, as defined by § 404 of the federal Clean Water Act or California Fish & Game code § 1600, et seq. through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, southern California black walnut, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.56, Part 16), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, § 22.56.215), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44, Part 10)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with the provisions of an adopted state, regional, or local habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) **No Impact.** The project site is in a completely developed condition within an urbanized area, with the majority of the site dominated by impervious surfaces. The only vegetation present on the site consists of non-native, ornamental trees and hedges. Special-status species that have been found in the general vicinity of the project site include southern tarplant (*Centromadia parryi* ssp. *australis*), tricolored blackbird (*Agelaius tricolor*), Riverside fairy shrimp (*Streptocephalus woottoni*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), San Bernardino aster (*Symphytotrichum defoliatum*), and southern California legless lizard (*Anniella stebbinsi*). While these species may be found associated with disturbed sites in urbanized or industrial landscapes, they all require habitat conditions that are not present on this site, such as hydric soils, sandy or loose loamy soils under sparse vegetation, or wetland habitats such as marshes, playas or vernal pools. The project site, being entirely paved except for the landscaped exotic trees and hedges, contains no such habitat. Due to the lack of appropriate habitat and isolation from natural open-space areas, no special-status species are expected to use the site; therefore, there would be no impact to any sensitive species of plants or wildlife.
- b) **No Impact.** The West Carson community and project site is located within the Dominguez Channel and Los Angeles Harbor Watershed and does not contain any Significant Ecological Areas (SEAs) or Sensitive Environmental Resource Areas (SERAs). No riparian habitat, coastal sage scrub, oak or native woodlands, streambeds, or jurisdictional wetlands occur within the project site or surrounding area. No state-recognized sensitive natural vegetation communities, as defined by the California Department of Fish and Wildlife (CDFW), occur on or near the project site. State-recognized sensitive vegetation habitats include those ranked S1, S2, or S3 on CDFW's Natural Communities List. The proposed project site and surrounding area were cleared of natural landscape features and developed many years ago. There would be no impact to any sensitive natural communities or riparian habitat.
- c) **No Impact.** Section 404 of the Clean Water Act defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."
- CDFW has jurisdiction over wetland resources associated with all perennial, intermittent, and ephemeral rivers, streams, lakes, and artificial waterways that have acquired the physical attributes of natural stream courses. CDFW has adopted the U.S. Fish and Wildlife Service (USFWS) definition of wetland, which is "lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water".⁹ This definition includes swamps, bogs, fresh, brackish and saltwater marshes, periodically inundated salt flats, intertidal mudflats, wet meadows, vernal pools, springs, seeps, lakes, ponds, rivers, and streams.
- There are no wetlands, rivers, or streams located on or adjacent to the project site, which is fully disturbed and mostly covered with impervious surfaces, except for some ornamental landscaping along the site frontages. Therefore, no impact would occur.
- d) **Less Than Significant with Mitigation Incorporated.** There are no waters or streams present on the site. Thus, the project would not impact or interfere with the movement of any native resident or migratory fish. Wildlife corridors are typically made up of undeveloped wildlife habitat and open space linkages between larger patches of wildlife habitat. Habitat linkages may also include more tenuous linkages like narrow vegetated pathways or islands of habitat that act as stepping stones between larger habitat areas for some species. The project site has been highly disturbed and is surrounded by

⁹ Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe, *Classification of Wetlands and Deepwater Habitats*, U.S. Fish and Wildlife Service, Washington, DC, FWS/OBS-79/31, 1979, p. 103.

developed urban land uses. There is a small area of open land with low, grassy groundcover immediately to the east of the project site, which contains a closed, former landfill site now owned by the County of Los Angeles, but there are no other open space or natural habitat areas anywhere in the project vicinity. Dense urban development and roads limit any wildlife movement opportunities except to those animals capable of flight (i.e., birds), which would be expected to utilize urban forest resources throughout the immediate area for nesting and roosting.

On-site structures, trees, and ornamental landscaping may provide suitable roosting and nesting habitat for bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). This project proposes activities that would result in the removal of tree(s), buildings, or other habitat for nesting birds. Project conditions requiring pre-construction surveys and avoidance measures, in combination with compliance with existing state and federal laws pertaining to the protection of nesting birds, would reduce potential impacts to these resources to a less-than-significant level.

Mitigation Measure 4-1: Proposed project activities (including, but not limited to, staging and disturbances to vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1 – August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct two consecutive bird surveys beginning two weeks prior to the initiation of project activities, to detect protected birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area. Two surveys should be conducted within the two-week period, with the second survey being conducted no more than three days prior to the initiation of project activities. If an active nest is found, project activities within 300 feet of the nest, or as determined by a qualified biologist, must be postponed until the nest is vacated and juveniles have fledged, and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer at a distance of 300 feet from the nest, subject to the discretion of a qualified biologist. Project personnel, including all contractors working on-site, shall be instructed on the sensitivity of the area. The project proponent shall provide the Los Angeles County Department of Regional Planning (LACDRP) the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the qualified biologist determines that a narrower buffer between the project activities and observed active nest(s) is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the LACDRP and, upon request, the CDFW. Based on the submitted information, the LACDRP (and the CDFW, if the CDFW requests) shall determine whether to allow a narrower buffer.

If work is allowed to proceed with a narrower buffer, the qualified biologist shall be present on-site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to

minimize the likelihood that active nests are abandoned or fail due to project activities. The qualified biologist shall send weekly monitoring reports to the LACDRP during the grubbing and clearing of vegetation and shall notify the LACDRP immediately if project activities damage active avian nests.

- e) **No Impact.** There are no oak woodlands or unique California native trees on the project site. There are only ornamental species of trees and shrubs within the landscape zones along the two site frontages. Therefore, no impact would occur.
- f) **No Impact.** The project site is not located within a Significant Ecological Area (SEA), Sensitive Environmental Resource Area (SERA), or Wildflower Reserve Area, and there are no oak trees or oak woodland on or near the project site. Additionally, the site does not include any native plant materials, water resources, or natural vegetation. As such, the proposed project would not conflict with any local policies or ordinances protecting biological resources and no impact would occur.
- g) **No Impact.** The project site does not lie within the limits of any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan area, and therefore should not conflict with the provisions of any such plans. Therefore, no impact would occur.

References:

California Natural Diversity Database (CNDDB). 2018. RareFind 5 [Internet]. California Department of Fish and Wildlife [September 30, 2018].

Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe, *Classification of Wetlands and Deepwater Habitats*, U.S. Fish and Wildlife Service, Washington, DC, FWS/OBS-79/31, 1979, p. 103.

GIS-NET, “Environmental Resources” and “Land and Water Features” layers, accessed 2/27/2018.

5. CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) ***No Impact.*** A historical resource is defined in CEQA Guidelines Section 15064.5(a)(3) as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period, or method of construction; representing the work of an important creative individual; or possessing high artistic values.

The County has many Historical Landmarks and Points of Historical Interest in its jurisdiction, including the remnants of vast ranchos, routes of early explorers, historic railroad lines, and the homes of prominent people who shaped local history. The State Historical Resources Commission administers the California Register, which lists over 500 historic resources throughout Los Angeles County. While the great majority of these resources are located in cities, 31 are located in the unincorporated areas.

The site was converted from agriculture several decades ago and has been developed with a variety of commercial and industrial uses since then. The ground surface and subsurface has been altered a number of times in conjunction with different construction activities that have occurred. A records search was conducted at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton, where there is a repository of research and reports regarding investigations and assessments of potential archaeological and historic resources.¹⁰ The search determined that the project site is not listed on the California Register of Historic Resources or the National Register of Historic Places. The site is not identified as a historic or cultural site in the Los Angeles County General Plan (Figure 9.9 in General Plan 2035). The property as a whole and the five remaining buildings were evaluated by a professional architectural historian with respect to eligibility criteria for the California Register of Historic Places, and it

¹⁰ Michael Baker International. July 31, 2018. *Records Search Results and California Register of Historical Resources Evaluation for the Bridge Point South Bay II Project*. This report is provided in Appendix C of this Initial Study.

was determined that there is nothing unique about the building architecture, the site, or the current or previous owners and occupants to indicate there is some historic significance associated with the site and the current improvements.¹¹ Results from the SCCIC records search, and the evaluation of the existing buildings for listing eligibility in the California Register of Historic Places are provided in Appendix C of this Initial Study (“Records Search Results and California Register of Historical Resources Evaluation for the BridgePoint South Bay II Project”). As such, the project would have no impact on a historic resource.

- b) ***Less than Significant with Mitigation Incorporated.*** Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” The site is currently developed with five buildings (one constructed in 1967 and four constructed in 1946), none of which were determined to be eligible for listing on the California Register of Historic Places. Further, the SCCIC records search did not identify any archaeological or historical resources on the site (see SCCIC records search and site historic resource evaluation report available in Appendix C of this Initial Study). Thus, none of the existing improvements are likely to yield valuable information which will contribute to our understanding of human history. It is difficult to determine whether there are any subsurface archaeological resources that may have been left here and became embedded in soil deposits over time. Often, this can only be discovered during excavations into native soil materials. As identified in the Conceptual Grading Plan (see Appendix D of this Initial Study) and discussed in the Geotechnical Investigation prepared by Southern California Geotechnical Investigation (see Appendix E of this Initial Study), the proposed grading plan involves the removal of existing undocumented and unstable fill materials, throughout the project site. Within and a few feet beyond the proposed building pad footprint, additional “over-excavation” is proposed to extend another 4-5 feet beneath the fill materials to place compacted materials that add additional support for the building loads. As shown in the Conceptual Grading Plan, over-excavation would need to extend approximately 15 feet beyond the eastern edge of the proposed building footprint. The over-excavations could penetrate into native soils, which could potentially disturb previous undiscovered archaeological resources. To avoid destruction of potentially significant resources, Mitigation Measures 5-1, 5-2, and 5-3 will be imposed to require monitoring of the over-excavations to ensure proper identification and treatment of archaeological resources that may be discovered during grading. Therefore, with mitigation incorporated, potentially significant impacts would be reduced to less than significant.

Potential impacts to tribal cultural resources are addressed in Section 18 - Tribal Cultural Resources, later in this Initial Study.

Mitigation Measure 5-1: Prior to the issuance of any grading permits, the applicant shall retain a qualified archaeologist, who meets the Secretary of the Interior’s Guidelines for an Archaeologist, to prepare and submit an Archaeological Monitoring Program (AMP) to LACDRP for review and approval. The AMP shall identify the locations to be monitored where grading would extend into native soils, procedures for identifying archaeological resources during construction, methods for evaluating the significance of finds, and measures that may be implemented to reduce potential impacts to less than significant.

Mitigation Measure 5-2: Prior to the start of grading activities, the qualified archaeologist and the qualified paleontologist (as required by Mitigation Measure 5-5) shall conduct an educational workshop to provide the construction crew with an overview of potential archaeological and paleontological resources that may be encountered during construction, the ways to identify them, the laws protecting those resources, and the procedures to follow when finds are encountered. The Applicant shall require all construction employees who are responsible for performing grading activities to attend the workshop before they begin work at the project site.

¹¹ *Ibid.*

Mitigation Measure 5-3: The qualified archaeologist shall monitor all grading activities in areas identified by the AMP that are within native soil materials. In the event archaeological resources are encountered during project grading, all ground-disturbing activities within 50 feet of the find shall cease and the qualified archaeologist shall evaluate the significance of the find, and if significant, determine and implement the appropriate mitigation to the satisfaction of the LACDRP, including, but not limited to a Phase III data recovery and associated documentation. The archaeologist shall document all recovered archaeological resources on the appropriate California Department of Parks and Recreation Forms 523 Series, which shall be filed with the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Mitigation Measure 5-4: Within 60 days after the conclusion of the archaeological monitoring effort and/or investigations, the archaeologist shall prepare a final report detailing the resources recovered, their significance, and treatment for submittal to the Director of the LACDRP and SCCIC.

- c) ***Less than Significant with Mitigation Incorporated.*** Paleontological resources, as defined by the Bureau of Land Management, U.S. Department of the Interior, are “the physical remains or other physical evidence of plants and animals preserved in soils and sedimentary rock formations. Paleontological resources are important for correlating and dating rock strata and for understanding past environments, environmental change, and the evolution of life.”

Records searches were conducted by specialists at the Natural History Museum of Los Angeles County to determine whether vertebrate or invertebrate fossil localities have been discovered in the same geological formations underlying the project site, in the project area, which would indicate a potential for encountering such resources during excavation for this project. The research findings indicated that there are no reported discoveries of invertebrate fossil localities in this area, where the same Holocene-era alluvial materials occur. The nearest findings have occurred in the Palos Verdes Peninsula in different formations. Several vertebrate fossil localities have been discovered in older Holocene-era alluvial deposits, similar to what occurs in the project vicinity. The older Holocene-era alluvium typically occurs at depths beneath the newer Holocene alluvium, which occurs in the uppermost soil layers. Based on these findings of other fossil localities in this area, there is some potential for encountering vertebrate paleontological resources if the project’s deeper excavations go beyond the upper alluvium and into native older alluvium materials.

To avoid the potential destruction of undiscovered paleontological resources, Mitigation Measures **5-5, 5-6, and 5-7** will be imposed to ensure proper identification and treatment of paleontological resources that may be discovered during grading. Therefore, with mitigation incorporated, potentially significant impacts would be reduced to less than significant.

Mitigation Measure 5-5: Prior to the issuance of any grading permits, the applicant shall retain a qualified paleontologist to prepare and submit a Paleontological Monitoring Program (PMP), in conformance with standards established by the Society of Vertebrate Paleontology (SVP), to LACDRP for review and approval. The PMP shall identify the locations to be monitored where grading would extend into native soils comprised of older Holocene-era alluvial materials, procedures for identifying paleontological resources during construction, methods for evaluating the significance of finds, and measures that may be implemented to reduce potential impacts to less than significant.

Mitigation Measure 5-6: The qualified paleontologist shall monitor all grading activities in areas identified by the PMP that are within native, older Holocene era alluvial materials. If paleontological resources are found during project grading, all ground-disturbing activities within 50 feet of the find shall cease and the qualified paleontologist shall evaluate the significance of the find and determine the appropriate treatment in accordance with SVP guidelines for identification, evaluation, disclosure, avoidance or recovery, and curation, as appropriate. All significant fossils encountered during grading shall be prepared to a point of identification and permanent preservation.

Mitigation Measure 5-7: Within 60 days after the conclusion of the monitoring effort and/or investigations, the paleontologist shall prepare a final report detailing the resources recovered, their significance, and treatment for submittal to the Director of the LACDRP, and the Natural History Museum of Los Angeles County Vertebrate and Invertebrate Paleontology Departments.

- d) ***Less than Significant Impact.*** Research on past land uses and a review of the site history conducted as part of the Environmental Site Assessment prepared for the proposed project (see Appendix F of this Initial Study), together with the cultural records search conducted at the South Central Coastal Information Center as discussed in response a), did not provide any indication of human burial occurring within the project site. Given the extensive level of site disturbance by past land use and development activities, it is considered unlikely that there are any human remains located onsite. As noted in the earlier response to b), there will be a limited level of grading into previously undisturbed soils; however, a potential to uncover human remains during ground disturbance activities may exist.

California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within a project site, disturbance of the site must halt until the county coroner has conducted an investigation into the circumstances, manner, and cause of any death, and has provided recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative. If the coroner determines that the remains are of Native American descent, he or she is required to notify the California Native American Heritage Commission (NAHC) within 24 hours. The NAHC would then identify the person(s) thought to be the Most Likely Descendant of the deceased Native American, who would have 48 hours from notification by NAHC to inspect the site of the discovery of Native American remains and to recommend to the applicant or landowner means for the treatment and disposition of the human remains and any associated grave goods. Construction contractors would be required to adhere to the provisions of California Health and Safety Code 7050.5, which would provide sufficient safeguards to avoid accidental or intentional destruction of human remains that may be uncovered during site construction activities. Therefore, with compliance of the California Health and Safety Code Section 7050.5, project impact would be less than significant. Please note that further information on procedures to be followed in the event that Native American burial remains are discovered, is provided in the response to 18b, later in this Initial Study.

References:

- Los Angeles County Department of Regional Planning. May 2014. List of Historic resources in unincorporated Los Angeles County. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-9_historic_resources.pdf.
- Los Angeles County General Plan 2035, Chapter 9, Conservation and Natural Resources Element.
- Los Angeles County Code, Section 22.44.1570-Archaeological/Paleontological/Historic Cultural Resources.
- Michael Baker International. *Records Search Results and California Register of Historical Resources Evaluation for the Bridge Point South Bay II Project*. July 31, 2018.
- Natural History Museum of Los Angeles County. Paleontological Records Search. Correspondence from Austin Hendy, Collections Manager, Invertebrate Paleontology to Michael Baker International. October 22, 2018.
- Natural History Museum of Los Angeles County. *Vertebrate Paleontology Records Search for paleontological resources for the proposed Bridgepoint II Project, between Torrance and Carson, Los Angeles County project area*. Correspondence from Samuel A. McLeod, Ph.D., Vertebrate Paleontology to Michael Baker International. October 25, 2018.

6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with Los Angeles County Green Building Standards Code (L.A. County Code Title 31)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Involve the inefficient use of energy resources (see Appendix F of the CEQA Guidelines)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

Per Section 15126.2(b) and Appendix F of the CEQA Guidelines, the goal of conserving energy implies decreasing overall per capita energy consumption, decreasing reliance on fossil fuels such as coal, natural gas and oil, and increasing reliance on renewable energy sources. In 2010, the County adopted the Green Building Standards Code (Title 31 of the County Code) to address these goals. The purpose of the County's Green Building Standards Code is to establish green building development standards for new projects with the intent to promote a healthier environment by encouraging sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality. In January 2011, the State of California adopted the CALGreen Building Code with mandatory measures that establish a minimum level of performance for green construction practices.

The County adopted its latest version of the Green Building Standards Code (Title 31), effective January 1, 2017. Concerning energy efficiency, Title 31 standards refer to the California Energy Code standards to govern minimum performance of building design and construction. The most current California Code standards are the 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (2016 Standards), which became effective on January 1, 2017. These are codified at Title 24, Part 6 of the California Code of Regulations.

California Energy Commission staff completed an Initial Study of the environmental impacts of the 2016 Standards for residential and nonresidential buildings. In this Initial Study, Energy Commission staff estimated that the implementation of the 2016 Standards could reduce statewide annual electricity consumption by approximately 281 gigawatt-hours per year, electrical peak demand by 195 megawatts per year, and natural gas consumption by 16 million therms per year. The potential effect of these energy savings to air quality may be a net reduction in the emissions of nitric oxide by approximately 508 tons per year, sulfur oxides by 13 tons per year, carbon monoxide by 41 tons per year, and particulate matter less than 2.5 microns in diameter by 13.57 tons per year. Additionally, Energy Commission staff estimated that the implementation of the 2016 Standards may reduce statewide GHG emissions by 160 thousand metric tons of carbon dioxide equivalent (CO₂e) per year.

Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space. For this reason, the 2016 Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference appendices are adopted along with the 2016 Standards that contain data and other information that helps builders attain this compliance.

The 2016 Standards include both mandatory and voluntary measures. Mandatory provisions applicable to construction of new or alterations to existing nonresidential structures pertain to design and installation of building envelopes, ventilation, space conditioning (insulation), and service water heating systems and equipment, and commissioning efforts to verify achievement of the required building energy performance standards. Other mandatory provisions that affect building energy efficiency include standards for indoor and outdoor lighting systems and equipment and electrical power distribution systems.

It is now likely that the project will be designed and constructed in accordance with the new 2019 Title 24 part 6 and part 11 standards, which will reduce energy usage of new non-residential by about 30%, due mainly to new lighting standards. These include requiring all parking lots to have occupant sensing controls that dim the lights when no one is present as well as requiring the use of high efficiency lighting for all outdoor and indoor lighting. In addition, the Title 24 standards require that electrical vehicle charging stations to be provided on 6 percent of all parking spaces as well as 8 percent of preferred parking spaces for clean air vehicles (e.g., low-emitting, fuel-efficient and carpool/vanpool vehicles). The Title 24 requirements also include enhanced insulation and ventilation requirements that in addition to making the proposed building more efficient, will also increase the sound attenuation of the buildings that will lower the noise emanating from the structure.

a) ***No Impact.*** The proposed building would be a concrete tilt-up structure, designed as a large shell with minimal interior furnishings, so that future tenants can specify and construct interior improvements, including energy, ventilation, and lighting systems that best fit their operational and administrative needs. The Project would be designed to comply with all mandatory provisions of the 2016 Standards (which are adopted by reference as part of the County's Green Building Standards Code) as those standards apply to this industrial building. Code-compliant energy efficiency features to be included in the project design have already been identified, including: constructing the roof in a way that can support future rooftop solar panels, installing electrical vehicle conduit within the parking area facing Torrance Boulevard, dual-pane/low emissions glass, and highly efficient light emitting diode (LED) outdoor lighting fixtures controlled by photocells. Compliance with the County's building energy efficiency standards will be demonstrated through detailed plans and specifications to be submitted for approval by the County's Public Works Department, Building Division, which must ensure that all energy efficiency standards will be met. Building permits will not be issued and occupancy will not be allowed, unless satisfactory demonstration of compliance with these standards is provided. This standard plan check and building permit process will ensure that this project does not conflict with the County's Green Building Standards Code, set forth in Title 31 of the Los Angeles County Code. This same plan check and permitting process to ensure compliance with all current building energy efficiency standards would occur whenever tenant improvements are proposed, which would occur subsequent to construction of the core/shell warehouse building. There would be no impact regarding this threshold.

b) ***Less Than Significant Impact.***

Electricity/Natural Gas Services

Southern California Edison (SCE) provides electrical services in Los Angeles County, including the project area, through State-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. In 2017, approximately 32 percent of SCE's power was obtained from renewable sources, including geothermal,

hydroelectric, wind and solar.¹² Unlike petroleum production, generation of electricity is usually not tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatt (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy produced by a unit, minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

The Southern California Gas Company (SCG) provides natural gas services to the project area. 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. In California and throughout the western United States, many new electrical generation plants that are fired by natural gas are being brought online. Thus, there is great interest in importing liquefied natural gas from other parts of the world. In 2016, nearly 32 percent of the electricity consumed in California was generated using natural gas.¹³ While the supply of natural gas in the United States and production has increased greatly, California produces little, and imports 90 percent of its natural gas.¹⁴

Energy Usage in Los Angeles County

Energy usage is typically quantified using the British Thermal Unit (BTU). Total energy usage in California was 7,676 trillion BTU in 2015 (the most recent year for which this specific data is available), which equates to an average of 197 million BTU per capita.¹⁵ Of California's total energy usage, the breakdown by sector is 39 percent transportation, 24 percent industrial, 19 percent commercial, and 18 percent residential.¹⁶ Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use.¹⁷ In 2017, taxable gasoline sales (including aviation gasoline) in California accounted for 15,540,154,774 gallons of gasoline.¹⁸

The electricity consumption attributable to Los Angeles County from 2007 to 2016 is shown in Table 6-1, Electricity Consumption in Los Angeles County 2007-2016. As indicated therein, energy consumption in Los Angeles County remained relatively constant between 2007 and 2016, with no substantial increase.

Table 6-1 - Electricity Consumption in Los Angeles County 2007-2016

Year	Electricity Consumption (in millions of kilowatt hours)
2007	71,227
2008	72,050
2009	69,921
2010	68,227
2011	68,117

¹² Southern California Edison, 2017 Power Content Label, July 2018, <https://www.sce.com/wps/wcm/connect/6ee40264-673a-45ee-b79a-5a6350ed4a50/2017PCL.pdf?MOD=AJPERES>. Accessed August 15, 2018.

¹³ United States Energy Information Administration, *California Energy Consumption Estimates, 2016*, <https://www.eia.gov/state/?sid=CA#tabs-1>, accessed July 30, 2018.

¹⁴ *Ibid.*

¹⁵ United States Energy Information Administration, *Table F30: Total Energy Consumption, Price, and Expenditure Estimates, 2015*, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=US, accessed July 23, 2018.

¹⁶ United States Energy Information Administration, *California State Profile and Energy Estimates*, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=US, accessed July 23, 2018.

¹⁷ *Ibid.*

¹⁸ California Department of Tax and Fee Administration, *Net Taxable Gasoline Sales*, <http://www.cdtfa.ca.gov/taxes-and-fees/MVF-10-Year-Report.pdf>, accessed July 23, 2018.

Year	Electricity Consumption (in millions of kilowatt hours)
2012	69,163
2013	68,364
2014	69,932
2015	69,529
2016	69,614

Source: California Energy Commission, *Electricity Consumption by County*, <http://www.ecdms.energy.ca.gov/>, accessed July 23, 2018.

The natural gas consumption attributable to nonresidential land uses in Los Angeles County from 2007 to 2016 is shown in Table 6-2, Natural Gas Consumption in Los Angeles County 2007-2016. Similar to electricity consumption, natural gas consumption in Los Angeles County remained relatively constant between 2007 and 2016, with no substantial increase.

Table 6-2 -Natural Gas Consumption in Los Angeles County 2007-2016

Year	Natural Gas Consumption (in millions of therms)
2007	2,990
2008	3,011
2009	2,955
2010	3,124
2011	3,061
2012	2,993
2013	3,129
2014	2,858
2015	2,823
2016	2,869

Source: California Energy Commission, *Gas Consumption by County*, <http://www.ecdms.energy.ca.gov/>, accessed July 23, 2018.

Automotive fuel consumption in Los Angeles County from 2007 to 2017 is shown in Table 6-3, Automotive Fuel Consumption in Los Angeles County 2007-2017 (projections for the year 2018 are also shown). As shown in Table 6-3, on-road automotive fuel consumption in Los Angeles County has declined steadily since 2007. Heavy-duty vehicle fuel consumption dropped in 2008 and 2009 and since then has steadily risen.

Table 6-3 - Automotive Fuel Consumption in Los Angeles County 2007-2017

Year	On-Road Automotive Fuel Consumption (Gallons)	Heavy-Duty Vehicle/ Diesel Fuel Consumption (Gallons)
2007	4,387,344,231	544,064,044
2008	4,207,951,324	492,780,305
2009	4,188,322,607	443,717,592
2010	4,169,713,239	462,501,798
2011	4,096,391,978	474,228,155
2012	4,003,486,947	476,704,241
2013	3,981,445,096	490,206,142
2014	3,995,029,340	502,689,188

Year	On-Road Automotive Fuel Consumption (Gallons)	Heavy-Duty Vehicle/ Diesel Fuel Consumption (Gallons)
2015	3,995,919,751	524,780,208
2016	3,986,927,263	545,516,966
2017	3,951,229,327	560,204,257
2018 (projected)	3,866,914,629	575,557,071

Source: California Air Resources Board, EMFAC2014.

Project Energy Consumption

The project's estimated energy consumption was estimated with the California Emissions Estimator Model (CalEEMod) outputs in the *Air Quality, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis* (Vista Environmental, October 2018) for the proposed project. CalEEMod applies energy use factors that are based on the CEC-sponsored *California Commercial End-Use Survey* (CEUS) and *Residential Appliance Saturation Survey* (RASS).¹⁹ The modeling results are summarized in Table 6-4, Energy Consumption. As shown therein, the electricity usage as a result of the fully developed and fully operational project would constitute an approximate 0.0012 percent increase over Los Angeles County's typical annual electricity consumption and an approximate 0.0003 percent increase in the typical annual natural gas consumption in Los Angeles County. The project-related vehicle fuel consumption would increase Los Angeles County's consumption by 0.0015 percent.

Table 6-4 - Energy Consumption

Energy Type	Project Annual Energy Consumption ¹	Los Angeles County Annual Energy Consumption ²	Percentage Increase Countywide ²
Electricity Consumption	848 MWh	69,614,000 MWh	0.0012%
Natural Gas Consumption ³	8,012 therms	2,869,000,000 therms	0.0003%
Fuel Consumption			
Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption ⁴	22,722 gallons	575,557,071 gallons	0.0039%
Operational Automotive Fuel Consumption ⁴	58,401 gallons	3,866,914,629 gallons	0.0015%

Notes:

1. As modeled in CalEEMod version 2016.3.2.
2. The project increases in electricity and natural gas consumption are compared with the total consumption in Los Angeles County in 2016. The project increases in automotive fuel consumption are compared with the projected countywide fuel consumption in 2018.
3. The project does not propose connections to the natural gas network; however, it is possible that future tenants may elect to do this on their own and these calculations represent an estimate of that potential energy consumption.
4. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2014 model.

Construction-Related Energy Demand

Project construction 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.

¹⁹ South Coast Air Quality Management District, *California Emissions Estimator Model Appendix E, Technical Source Documentation*, October 2017.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, 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 USEPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

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 project-related 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. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the cost of doing business.

As indicated in Table 6-4, the project's fuel from construction would be 22,722 gallons, which would increase fuel use in the County by 0.0039 percent. As such, construction would have a nominal 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. As such, a less-than-significant impact would occur in this regard.

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 6-4 provides an estimate of the daily fuel consumed by vehicles traveling to and from the Site. As indicated in Table 6-4, operation of the project is estimated to consume approximately 58,401 gallons per of fuel per year, which would increase automotive fuel consumption throughout Los Angeles County by 0.0015 percent. The project would not result in any unusual characteristics that would result in excessive operational fuel consumption as the proposed warehousing facility is typical of many other warehouses built in southern California in recent years and is intended to serve an existing market oriented to shipping of materials, goods and products from the Ports of Los Angeles and Long Beach throughout the southern California region. The project is located within approximately 10 miles of the Ports of Los Angeles and Long Beach and would therefore have shorter vehicle trips than similar warehouse/distribution centers that are typically located in the Inland Empire. Use of standard medium and heavy-duty trucks is anticipated and as such, the fuel consumption characteristics would be dictated by the truck engine manufacturers and their efforts to comply with applicable federal fuel economy standards. No unusual forms or patterns of distribution requiring new types of fuels or less fuel-efficient trucks or other forms of transportation would occur. Fuel consumption associated with project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Building Energy Demand

The project would consume energy for interior and exterior lighting, heating/ventilation and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems, among other things. 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. Implementation of the Title 24 standards significantly reduces energy usage, compared to buildings constructed prior to 1978. Title 24 standards are also updated every three years. As a state, California Title 24 standards are 29 percent more efficient than Federal standards²⁰. Furthermore, 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 (CCA) to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 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 project is not anticipated to increase the peak and base period demand pertaining to electricity and energy, as the electricity and energy usage of the project would be minimal compared to the County's energy consumption (refer to Table 6-4, above). The increase in reliance of such energy resources further ensures projects would not result in the waste of the finite energy resources, i.e. petroleum fuels or natural gas. As indicated in Table 6-4, operational energy consumption would represent an approximate 0.001 percent increase in electricity consumption over the current countywide usage. The project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

As indicated in Table 6-4, operational energy consumption would represent an approximate 0.0012 percent increase in electricity consumption and a 0.0003 percent increase in natural gas consumption over the current Countywide usage. In addition, the project would adhere to all Federal²¹, State, and local requirements for energy efficiency, including Title 31 (Green Building Standards) of the Los Angeles County Code of Ordinances, which mandates compliance with the California Building Energy Efficiency standards and other applicable energy efficiency measures set forth in the California Green Building Code standards. As such, the project would not result in a significant increase to the County's electricity or natural gas usage, and would not result in the inefficient, wasteful, or unnecessary consumption of building energy, following compliance with all current and future Federal, State, and local energy efficiency requirements. The project would not result in a substantial increase in the level of demand and would not result in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure.

Conclusion

As shown in Table 6-4, the project-generated increase in consumption of electricity and natural gas over existing countywide conditions would be negligible. The increase in countywide automotive fuel consumption would be approximately 0.0015 percent, and this is also considered negligible. Given the project's small share of countywide energy usage, this project would not have a significant impact on regional energy supply resources. In addition, the project would be subject to compliance with all Federal, State, and local requirements for energy efficiency, which would ensure adequate energy efficiency during operations. For the reasons described above, the project would not place a substantial demand on regional

²⁰ California Energy Commission, Staff Report: Energy Efficiency Comparison California's 2016 Building Energy Efficiency Standards and International Energy Conservation Code - 2015, http://www.energy.ca.gov/business_meetings/2017_packets/2017-06-14/Item_03/ENERGY%20EFFICIENCY%20COMPARISON__Residential%20Draft%205%2025%2017.pdf, accessed July 30, 2018.

²¹ Environmental and Energy Study Institute, Fact Sheet – Energy Efficiency Standards for Appliances, lighting and equipment (2017), <http://www.eesi.org/papers/view/fact-sheet-energy-efficiency-standards-for-appliances-lighting-and-equipment>, accessed July 30, 2018.

energy supplies or require significant additional capacity, would not increase electrical demand during peak periods or cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance. Thus, project impacts involving energy consumption would be less than significant.

References:

- California Department of Tax and Fee Administration. Net Taxable Gasoline Sales. <http://www.cdtfa.ca.gov/taxes-and-fees/MVF-10-Year-Report.pdf>. Accessed July 23, 2018.
- California Energy Commission. Electricity Consumption by County. <http://www.ecdms.energy.ca.gov/>. Accessed July 23, 2018.
- California Energy Commission. Gas Consumption by County. <http://www.ecdms.energy.ca.gov/>. Accessed July 23, 2018.
- California Energy Commission. Staff Report: Energy Efficiency Comparison California's 2016 Building Energy Efficiency Standards and International Energy Conservation Code – 2015. http://www.energy.ca.gov/business_meetings/2017_packets/2017-06-14/Item_03/ENERGY%20EFFICIENCY%20COMPARISON__Residential%20Draft%205%2025%2017.pdf. Accessed July 30, 2018.
- Environmental and Energy Study Institute. 2017. Fact Sheet – Energy Efficiency Standards for Appliances, lighting and equipment (2017). <http://www.eesi.org/papers/view/fact-sheet-energy-efficiency-standards-for-appliances-lighting-and-equipment>. Accessed July 30, 2018.
- South Coast Air Quality Management District. October 2017. California Emissions Estimator Model. Appendix E, Technical Source Documentation.
- Southern California Edison. July 2018. 2017 Power Content Label. <https://www.sce.com/wps/wcm/connect/6ee40264-673a-45ee-b79a-5a6350ed4a50/2017PCL.pdf?MOD=AJPERES>.
- United States Energy Information Administration. 2015. Table F30: Total Energy Consumption, Price, and Expenditure Estimates. https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=US. Accessed July 23, 2018.
- United States Energy Information Administration. 2016. California Energy Consumption Estimates. <https://www.eia.gov/state/?sid=CA#tabs-1>. Accessed July 30, 2018.
- United States Energy Information Administration. California State Profile and Energy Estimates. https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=US. Accessed July 23, 2018.

7. GEOLOGY AND SOILS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Expose people or structures to 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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction and lateral spreading?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, § 22.56.217)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

Information presented below concerning geological and soils conditions on and affecting the proposed development site is based on the geotechnical investigation for the project prepared by Southern California Geotechnical prepared in June 2017. The entire report is included in this IS/MND as Appendix E. Additional information regarding the proposed SMP to address potentially unknown soil contamination during grading is provided in the responses to Hazards, later in this Initial Study.

- a, i) ***Less than Significant Impact.*** Research of available maps indicates that the subject site is not located within an Alquist-Priolo Earthquake Fault Zone.²² In addition, the geotechnical investigation conducted by Southern California Geotechnical, which included a literature, map review, on-site reconnaissance, and subsurface investigations, did not indicate any evidence of faulting. The project is subject to review by the Los Angeles County Department of Public Works (LACDPW), to ensure compliance with the California and Los Angeles County Building Code standards pertaining to seismic safety. Adherence to these codes will reduce potential impacts in the event of fault rupture to less than significant.
- a, ii) ***Less than Significant Impact.*** Like most of Southern California, the subject site is in an area which is subject to strong ground motions due to earthquakes. The proposed project would have no effect on those regional seismic conditions. The 2016 California Building Code provides procedures for earthquake-resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Adherence to the seismic design parameters as outlined in the California Building Code and the County Building Code would reduce potential impacts to site improvements to less than significant; thus, no further mitigation is required in relation to this issue.²³
- a, iii) ***Less than Significant Impact.*** Liquefaction is the loss of strength in generally cohesionless (granular), saturated soils when the pressure of groundwater held within a soil or rock, in gaps between particles (referred to as “pore-water pressure”) induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. Lateral spread or flow refers to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water. In general, lateral spreading is a result of liquefaction.

The primary factors that influence the potential for liquefaction include groundwater table elevation, soil type, and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface.

The Seismic Hazards Zones Map for the Torrance Quadrangle, published by the California Geological Survey, indicates that the subject site is located within a liquefaction hazard zone. To determine the site-specific liquefaction potential, the geotechnical investigation included a detailed liquefaction evaluation, which is summarized below and discussed in its entirety in Appendix E of this IS/MND.

The liquefaction analysis was conducted in accordance with the requirements of Special Publication 117A (CDMG 2008), and currently accepted practice (SCEC 1997). This method predicts the earthquake-induced liquefaction potential of the site based on a given design earthquake magnitude and peak ground acceleration at the subject site.

The subsurface exploration conducted for this project consisted of 8 borings (identified as Boring Nos. B-1 through B-8) advanced to depths of 5 to 50± feet below the existing site grades. The boring locations are presented on the geotechnical legend contained in Appendix E of this IS/MND. The liquefaction analysis was performed for two soil borings (B1 and B6), which were advanced to depths of 50± feet.²⁴ Potentially liquefiable soils in two strata were encountered at B6, while none were encountered at B1. The liquefiable strata exist at depths of 27 to 29± feet and 29 to 32± feet. The remaining soil strata encountered below the estimated 25-foot-deep historic high groundwater table either possess adequate factors of safety

²² California Geological Survey, Earthquake Zones of Required Investigation, Torrance Quadrangle, released March 25, 1999, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/TORRANCE_EZRIM.pdf, accessed March 8, 2018.

²³ Based on the soil profile and the proximity of known faults with respect to the subject site.

²⁴ Boring B1 is located at the northwestern corner of the site along Normandie Avenue and Torrance Boulevard adjacent to an existing office structure; boring B6 is located along the southeastern portion of the project site adjacent to the storm drain easement.

or are considered non-liquefiable due to their cohesive characteristics. Settlement analyses were also conducted for the potentially liquefiable strata. Based on the results of the settlement analyses, differential settlements are expected to be on the order of $1.3 \pm$ inches or less, across a distance of 100 feet. Since liquefaction potential can vary locally, it should be considered that total dynamic settlements will range between 0 and 1.32 inches for the entire site; likewise, the differential settlements should also be considered for the whole site. The geotechnical report prepared for this project indicates that this level of differential settlement is typical for buildings of this type that are built on shallow foundations. In addition to the building foundation, consideration should be given to the utility connections in relation to differential settlement; which occur with the soil expands, contracts, or shifts beneath a structure, which can also impact undergrounded utilities.

Designing the proposed structures to remain completely undamaged during a seismic event that could occur once every 2,475 years (the code-specified return period used in the liquefaction analysis) is not considered to be economically feasible. Based on this understanding, the use of shallow foundation systems is considered to be the most economical means of supporting the proposed structures; this type of foundation is proposed for this project. Such a foundation system can be designed to resist the effects of the anticipated differential settlements, to the extent that the structures would not catastrophically fail. However, it is likely that even with consideration in design, minor to moderate repairs, such as releveling, restoration of utility connections, and repair of damaged drywall and stucco, would likely be required after the occurrence of the liquefaction-induced settlements.

Potential settlement conditions that could result from liquefaction will be alleviated through removal of undocumented fill materials and near surface alluvial materials, and replacement with compacted structural fill, as noted in the preliminary geotechnical report and proposed grading plan prepared for this project, which have been reviewed and approved by the LACDPW. The Conceptual Grading Plan is available in Appendix D. The Geotechnical and Infiltration Testing Reports are available in Appendix E. This action, along with all recommended design and construction measures identified in the geotechnical report, are intended to comply with the County's building code standards and will be incorporated into final plans and specifications for LACDPW approval. In addition, all grading activities must comply with the provisions of a USEPA-approved SMP, to ensure there are no harmful releases of soil contaminants that may be encountered, as discussed in Section 9. Hazards, and as specified in Mitigation Measure 9-3. No further mitigation would be required. Through the County's standard and mandatory plan check and permitting process and the preparation and review of preliminary and final geotechnical reports, potential impacts involving liquefaction and related settlement, as well as other soils constraints, would be addressed in compliance with the County's building codes. As a result, project impacts would be less than significant.

- a, iv) **No Impact.** The project site is not located in an area that is considered susceptible to earthquake-induced landslides.²⁵ The site topography slopes downward to the east at a gradient of less than two percent. Thus, the project would have no impact in relation to this issue.
- b) **Less than Significant Impact.** Because of the extensive ground alterations that have occurred on-site since development first occurred more than 50 years ago, there is no native topsoil remaining in the near surface. There would, thus, be no impact involving loss of topsoil. During construction of the proposed project, the uncovered soils on-site may become exposed to wind or rainstorms and thus subject to erosion. The proposed project must comply with SCAQMD Rule 403, Fugitive Dust, to reduce the amount of particulate matter in the ambient air due to man-made fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. This rule requires that construction activities include a variety of Best Available Control Measures (BACMs), including measures that would prevent wind-induced erosion of uncovered soils, such as applying chemical stabilizers to areas that would remain

²⁵ California Geological Survey, Earthquake Zones of Required Investigation, Torrance Quadrangle, released March 25, 1999, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/TORRANCE_EZRIM.pdf, accessed March 8, 2018.

inactive for 10 days or longer, to replant disturbed areas as soon as practical, and to suspend grading when wind speeds exceed 25 miles per hour. Rainstorm-induced erosion of uncovered ground surfaces during construction would be prevented by complying with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements, as noted in the response to topic 10a, later in this Initial Study. NPDES requires construction of the project to incorporate best management practices (BMPs) to prevent erosion and prevent loose soils from washing off-site. In general, BMPs for a project such as the proposed project would include the use of berms or drainage ditches to divert water around the site and preventing sediment from migrating off the site by using temporary swales, silt fences, or gravel rolls. Thus, the potential for soil erosion during any construction activity would be reduced to less than significant through project compliance with existing regulations.

Operation of the proposed project would result in approximately 90 percent of the site developed with the building structure or paved, thus eliminating any potential for wind or rain-induced erosion.²⁶ The project would include some ornamental landscaping along the perimeter, which would assist in preventing any potential erosion from the non-paved areas. Thus, project implementation would not result in soil erosion or the loss of topsoil.

- c) ***Less than Significant Impact.*** Based on the results of the geotechnical analysis, the occurrence of landslides, settlement, and/or slippage are not a constraint to project implementation. In addition, because the proposed grading plan and site improvements would all occur within the limits of the subject property, and would result in improved soil stability, the proposed development would not adversely affect the geologic stability of the adjacent properties. Likewise, the project site is not located on a cliff, mountainside, bluff, or other geographic feature, and thus has no slope stability concerns associated with such conditions. However, the project site is in an area that has been identified as susceptible to liquefaction as noted on the California Geologic Survey map. Please refer to response 7a) iii regarding the liquefaction hazard assessment.

In addition, minor ground subsidence, which is the caving or sinking of an area of land, is expected to occur in the soils below the area to be excavated. Based upon the subsurface conditions, subsidence is estimated to be $0.1 \pm$ feet. The actual amount of subsidence is expected to be variable and would be dependent on the type of machinery used, repetitions of use, and dynamic effects, all of which are difficult to assess precisely.

The subject site is generally underlain by surficial fill soils, extending to depths of 3 to $17 \pm$ feet. These fill soils vary in strength and composition, and most samples include minor amounts of asphalt debris. Based on their variable strengths, debris content, and unfavorable consolidation characteristics, the existing fill soils are considered to represent undocumented fill. They are therefore not considered suitable for support of new structures. Furthermore, the LACDPW does not allow construction of new buildings on existing undocumented fill soils. Therefore, remedial grading will be necessary within the proposed building area to remove and replace these soils as compacted structural fill.

Remedial grading measures to address unstable soils conditions are identified in the preliminary geotechnical report; including the Grading Guide Specifications, to achieve compliance with the County's building code standards for earthwork and structural design. That report has been reviewed and approved by the LACDPW. With those recommendations and the required adherence to the Grading Guide Specifications in place, potential impacts involving subsidence, undocumented fills, or unstable geologic units would be avoided or reduced to less than significant. All the recommendations and grading specifications identified in the geotechnical investigation will be included in the project's final plans, which are subject to review and approval by the LACDPW prior to any construction. Recommended actions that

²⁶ Herdman Architecture and Design, Site Plan A1, prepared August 2018.

are to occur during construction will also be verified by the County inspectors. No additional mitigation would be required.

- d) ***Less than Significant Impact.*** The composition of the near-surface soils at this site range from silty clays to sandy clays to clayey sands. Laboratory testing performed on representative samples of these materials indicate that they possess very low to low expansion potentials. Based on the presence of expansive soils, the recommendations identified in the geotechnical report, including the Grading Guide Specifications, shall be implemented to ensure proper moisture condition and that adequate moisture content is maintained within all subgrade soils as well as newly placed fill. Additional expansion index testing shall be conducted at the completion of rough grading to verify the expansion potential of the as-graded building pad. Prior to the issuance of building permits, the project applicant shall provide verification to the LACDPW that the requirements of the final geological investigation and recommendations have been fully executed and the soils meet the stability requirements as set forth in the State and County building codes. This standard County review and verification process will ensure that potential impacts related to expansive soils are avoided or reduced to less than significant. As such, the project would alleviate, rather than exacerbate, existing expansive soils conditions.
- e) ***No Impact.*** The project would discharge all wastewater generated within the proposed building via a lateral connection to Los Angeles County Consolidated Sewer Maintenance District's sewer main in Torrance Boulevard. There would be no on-site wastewater system. Thus, the project would have no impact in relation to this issue.
- f) ***No Impact.*** The Hillside Management Area Ordinance applies to any portion of a lot or parcel of land with a slope of 25 percent or greater. According to the geotechnical investigation conducted for the proposed project, the site topography slopes downward to the east at a gradient of less than two percent. The site grades range from a maximum elevation of $44\frac{1}{2}\pm$ feet mean sea level (msl) in the southwestern area of the site to a minimum elevation of $33\pm$ feet msl in the northeastern corner of the site. A descending slope is located along the eastern portion of the northern property line and the northern portion of the eastern property line. The slope ranges from 1 to $10\pm$ feet in height with inclinations ranging from 5h:1v to 2h:1v. Thus, no portion of the project site contains slopes with a grade of 25 percent or greater, and the project would have no impact in relation to this issue.

References:

- California Division of Mines and Geology (CDMG), 2008. Guidelines for Evaluating and Mitigating Seismic Hazards in California,” State of California, Department of Conservation, Division of Mines and Geology, Special Publication 117A,
- Southern California Earthquake Center (SCEC), University of Southern California. 1997. Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California.
- Southern California Geotechnical. 2017. Geotechnical Investigation Proposed Commercial Industrial Building 20846 South Normandie Avenue Los Angeles County, California for Bridge Development Partners.
- California Geological Survey. 2016. Earthquake Zones of Required Investigation – Torrance Quadrangle. Accessed March 8, 2018.
http://gmw.conservacion.ca.gov/SHP/EZRIM/Maps/TORRANCE_EZRIM.pdf
- Thienes Engineering, Inc. February 2018. Conceptual Grading Plan-Bridge Development, Southeast Corner of Torrance Boulevard and Normandie Avenue.

8. GREENHOUSE GAS EMISSIONS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

Vista Environmental prepared an Air Quality, Greenhouse Gas, and Health Risk Impact Analysis for the proposed project in August 2018, which includes calculations of the project's GHG emissions and an assessment of potential environmental impacts resulting from those emissions. The results of that analysis are summarized in response to the impact thresholds below. The report can be found in this IS/MND as Appendix B.

- a) ***Less Than Significant Impact.*** Over the past 50 years, changes in the global climate, such as temperature increases and sea level rise, have accelerated. There is strong consensus amongst most of the scientific community that these changes are the probable result of man-made GHG emissions. Changing climatic conditions as a consequence of excess GHGs in the atmosphere may cause unique impacts on California and Los Angeles County, including higher energy bills, increases in the number of extreme heat days and related health problems, extended drought, and sea level rise. The proposed project would generate GHG during the construction phase, through emissions from combustion-powered machinery and vehicles, plus applications of asphalt and architectural coatings. In the fully developed and operational condition, the project would result in ongoing generation of GHGs, from the following direct and indirect sources:
- Area sources, e.g., consumer products, aerosol sprays, and landscaping maintenance;
 - Building energy consumption;
 - Mobile sources, e.g., vehicular emissions associated with project-generated traffic;
 - Off-road equipment powered by combustion engines for site maintenance and possibly for cargo handling at the truck loading area. The quantitative analysis of operational GHG emissions conducted as part of the Air Quality, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis (Appendix B of this Initial Study) assumed that there could be diesel-powered or other combustion engine-powered off-road equipment. PDF 3-4, however, will prohibit any diesel-powered off-road equipment and require that all such equipment be powered by batteries, or by engines or other propulsion systems with clean fuels that do not result in diesel emissions;
 - Water consumption and wastewater treatment (indirectly, as a result of energy-related emissions associated with extraction, treatment, and delivery of potable water to the site and energy applied in wastewater conveyance and treatment processes); and

- Solid waste disposal (indirectly, due to decomposition of waste materials in landfills that produce methane gas, an intensive form of a GHG).

All of the same inputs applied in the calculation of the project's air pollutant emissions that were described in the response to Checklist topic 3b), earlier in this Initial Study, were applied in the calculations of the project's construction period GHG emissions. All of the same inputs for the operational sources applied in the calculations of air pollutant emissions were applied in the calculations of GHG emissions. The primary operational GHG sources would include building energy consumption and vehicle exhausts from passenger vehicle and truck traffic associated with the proposed warehouse/distribution facility. Key assumptions for vehicular exhausts GHG emissions included 37 delivery trucks at the loading docks per day (total 74 trips per day in and out of the site) and diesel-powered forklifts and other potential off-road equipment such as street sweepers operating a combined total of 24 hours a day. The GHG analysis conservatively includes GHG emissions from diesel-powered forklifts and other off-road equipment even though PDF 3-4 requires such equipment to be powered by batteries, alternative fuels or other non-diesel sources. In addition, the GHG analysis conservatively does not take credit for PDF 8-1 and PDF 8-2, as follows:

Project Design Feature 8-1. Adequate infrastructure shall be installed onsite to facilitate future electric charging stations for heavy duty trucks or for heavy duty trucks to plug-in (providing, at a minimum, an available power supply and conduits).

Project Design Feature 8-2. Warehouse building roof shall be designed to be solar ready.

Construction and operational GHG emissions were calculated with CalEEMod Version 2016.3.2, a computer software developed by the California Air Resources Board and the SCAQMD to apply the carbon intensity factors for various types of GHG sources to the estimated levels associated with land use types. CalEEMod provides a uniform platform for calculating GHG emissions for most types of land uses and the common GHG sources associated with them and is the most widely used emissions estimating model in California. This model can be calibrated to adjust GHG factors based on regulatory standards for past years, current conditions, and anticipated future changes that affect GHG emission intensities for various types of combustion-powered engines, building energy standards, different compositions of vehicular fuels affected by federal and state standards, and so forth. This capability enables comparison of estimated emission footprints for a project based on past scenarios with footprints based on current or future scenarios, to demonstrate the GHG-reducing benefits of changes in regulatory standards over the years that have become more stringent with respect to lowering GHG intensities from the sources noted above. Los Angeles County adopted a Community Climate Action Plan (CCAP) in October 2015. "To reduce the impacts of climate change, the County has set a target to reduce GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11% below 2010 levels by 2020."²⁷ A CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions in a climate action plan in accordance with CEQA Guidelines Section 15183.5(b), such as the CCAP. The CCAP at page 1-2 states:

"Tiering from the General Plan EIR potentially eliminates the need to prepare a quantitative assessment of project level GHG emissions. Rather, project-specific environmental documents that rely on the CCAP can qualitatively evaluate GHG impacts by identifying all applicable CCAP actions and describing how those actions have been incorporated into the project design and/or identified as mitigation. This type of "tiered" analysis can reduce project costs and streamline the County permit process."

²⁷ County of Los Angeles Department of Regional Planning, *Final Unincorporated Los Angeles County Community Climate Action Plan 2020*, August 2015.

“Projects that demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change (notwithstanding substantial evidence that warrants a more detailed review of project-level GHG emissions).”

Therefore, the project’s GHG emissions are evaluated for consistency with the CCAP. Table 8-1 presents estimated project GHG levels for 2010 and for the proposed project 2019 buildout conditions, assuming application of all current federal and state standards that affect GHG intensities for the various sources associated with this project. The estimated 2010 emissions correspond to the base year addressed in Los Angeles County’s CCAP, which, as explained above, was adopted to guide strategies to reduce GHG emissions within the unincorporated areas by at least 11 percent between 2010 and 2020, in concert with state of California goals for GHG reduction in that time period. (More information on the CCAP is presented in response 8(b)). Emission forecasts developed for the CCAP were based, in part, on land use assumptions set forth in the countywide General Plan. The proposed project is consistent with those land use assumptions, as it is consistent with the General Plan land use designation of IL. The project’s emissions, therefore, are consistent with emissions forecasts developed for the CCAP.

As shown in Table 8-1, the proposed project would generate 2,236.73 metric tons of carbon dioxide equivalent (MTCO₂e) of GHG emissions per year based on the estimated year 2010 GHG emissions rates and would generate 1,708.38 MTCO₂e per year in the project opening year 2019, based on approved statewide GHG reduction regulations that would be fully implemented by year 2019. This represents a reduction of nearly 24 percent compared to the 2010 scenario. These reductions come mainly from adopted statewide GHG reduction regulations including Executive Order S-1-07, which establishes performance standards for the carbon intensity of transportation fuels; Assembly Bill (AB) 149, which limits GHG emissions from new vehicles sold in California; AB 341, which reduces solid waste transferred to landfills; CCR Title 24, Part 6 2016 Building Energy Efficiency Standards; and CCR Title 24, Part 11 2016 CALGreen Standards, which improves energy efficiency or reduces GHGs through water conservation, waste reduction, and other green building practices.

As seen in Table 8-1 below, the project emissions would be 23.6 percent lower than if the same project had been built in 2010. Since the project emissions would more than achieve the 11 percent reduction from the 2010 scenario, as targeted in the County’s CCAP, the project would not conflict with the GHG reduction objective of the CCAP. As such, the project is consistent with the CCAP, which supports a determination that the project’s GHG emissions are less than significant.²⁸

Table 8-1 also indicates the project’s GHG footprint would be well below 3,000 MTCO₂e, which is the lowest project-level screening threshold discussed by the SCAQMD GHG Working Group in 2010 that could apply to a warehouse project permitted by a local agency.²⁹ That threshold has not been formally adopted by SCAQMD or by the County of Los Angeles; therefore, it is presented for informational purposes regarding the project’s consistency with the CCAP and other GHG reduction plans, policies and programs .

²⁸ CCAP, p. 1-2, Figure 1-1.

²⁹ In September 2010, the Working Group proposed extending the 10,000 MTCO₂e/yr screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions, Tier 2 is consistency with a GHG reduction plan, Tier 3 is a screening value or bright line, Tier 4 is a performance based standard, with three options that include percent emission reductions, early implementation of AB 32 scoping plan measures, or an efficiency target, and Tier 5 is GHG mitigation offsets. According to the presentation given at the September 28, 2010 Working Group meeting, SCAQMD staff proposed a Tier 3 draft threshold of 1,400 to 3,500 MTCO₂e/year depending on if the project was commercial, mixed use or residential. See also, SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, available at [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2).

Given the global nature of climate change, the GHG emissions from a single project do not automatically constitute a significant impact. Since the County has not adopted any “bright-line” thresholds to determine the level of significance of a project’s GHG footprint, the County’s determination of whether the project’s GHG emissions could be significant is based on consistency with the CCAP and the RTP/SCS as applicable GHG reduction plans, policies and programs. As discussed above and in item 8b, the project is consistent with the County CCAP and the RTP/SCS. Accordingly, the project’s GHG emissions will result in a less-than-significant impact.

Table 8-1 – Project-Related Annual Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO _{2e}
Year 2010 Estimated Emissions				
Area Sources ¹	0.01	0.00	0.00	0.01
Energy Usage ²	329.99	0.01	0.00	331.27
Mobile Sources ³	1,466.50	0.11	0.00	1,469.37
Off-Road Equipment ⁴	38.80	0.01	0.00	39.08
Solid Waste ⁵	38.90	2.30	0.00	96.38
Water and Wastewater ⁶	210.56	1.54	0.04	260.48
Construction ⁷	20.51	0.00	0.00	20.60
Total 2010 Emissions	2,124.66	3.97	0.04	2,236.73
Year 2019 Emissions				
Area Sources ¹	0.01	0.00	0.00	0.01
Energy Usage ²	329.99	0.01	0.00	331.27
Mobile Sources ³	1,033.13	0.05	0.00	1,034.51
Off-Road Equipment ⁴	35.69	0.01	0.00	35.97
Solid Waste ⁵	19.45	1.15	0.00	48.19
Water and Wastewater ⁶	177.71	1.30	0.03	219.84
Construction ⁷	20.51	0.00	0.00	20.60
Total 2019 Emissions	1,608.44	2.52	0.03	1,708.38
Percent Reduction between 2010 and 2019				23.6%
County of Los Angeles Reduction Threshold				11.0%
SCAQMD Draft Threshold of Significance				3,000
Exceed Thresholds?				No

Notes:

¹ Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

² Energy usage consists of GHG emissions from electricity and natural gas usage. CalEEMod utilizes the same energy usage rates based on the most current 2016 CCR Title 24, Part 6 requirements for all analysis years.

³ Mobile sources consist of GHG emissions from vehicles.

⁴ Off-road equipment consists of GHG emissions from potential diesel forklifts operated on-site.

⁵ Waste includes the carbon dioxide and methane emissions created from the solid waste placed in landfills.

⁶ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

⁷ Construction emissions amortized evenly over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009. Total construction emissions would be approximately 375 metric tons of CO₂ equivalent GHG intensity.

Source: CalEEMod Version 2016.3.2.

b) *Less than Significant with Mitigation Incorporated.*

Assembly Bill 32 (AB 32)

In 2006, California adopted AB 32, the Global Warming Solutions Act, as an effort to address the effects of climate change. AB 32 establishes a statewide goal to achieve 1990 GHG emissions levels by 2020, and to reduce statewide emissions to 80 percent below 1990 levels by 2050. The AB 32 Scoping Plan suggests a unique role for local governments and communities in helping achieve statewide GHG reduction goals. The County of Los Angeles is addressing the goals of AB 32 and the statewide Scoping Plan through its CCAP, as discussed below.

Los Angeles County Community Climate Action Plan

Climate action plans include an inventory of GHG emissions and measures for reducing future emissions to achieve a specific reduction target. Los Angeles County has adopted a CCAP to mitigate and avoid GHG emissions associated with community activities in unincorporated Los Angeles County. Community activities encompass the full range of GHG sources driven by private sector actions, whereas municipal activities encompass GHG sources from government operations. The CCAP was adopted as part of the Los Angeles County General Plan 2035 on October 6, 2015, and the County is working to implement the CCAP objectives. As such, the CCAP is a qualified GHG reduction plan as set forth in Section 15183.5 of the State CEQA Guidelines, and an assessment of the proposed project's incremental GHG impact may be tiered from the cumulative impact assessment conducted for adoption of the CCAP. Accordingly, if the project is found to be consistent with the provisions of the CCAP, it supports a determination that the project's impacts would not be cumulatively considerable and therefore less than significant.

The CCAP addresses emissions from building energy, land use and transportation, water consumption, and waste generation. The measures and actions outlined in the CCAP are intended to link together the County's existing climate change initiatives and provide a blueprint for a more sustainable future. The CCAP identifies emissions related to community activities, establishes a GHG reduction target consistent with AB 32, and provides a roadmap for successfully implementing GHG reduction measures selected by the County. Importantly, the CCAP will recognize the County's leadership and role in contributing to statewide GHG emissions reductions. Actions undertaken as part of the CCAP will also result in important community co-benefits including improved air quality, energy savings, and increased mobility, and will enhance the resiliency of the community in the face of changing climatic conditions. The CCAP sets a target to reduce total GHG emissions from community activities to 11 percent less than 2010 levels, by 2020.

Estimated GHG emissions generated by community activities in the unincorporated areas in 2010 were approximately 7.9 million MTCO₂e. This is equivalent to the annual GHG emissions generated by approximately 1.6 million passenger vehicles and represents per capita emissions of 7.5 MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49 percent). Transportation emissions from on- and off-road vehicles are the second largest source of emissions (42 percent). The third largest source is community waste generation (7 percent). The remaining sources are water conveyance and wastewater generation (2 percent), agriculture (0.4 percent), and stationary sources (0.02 percent).

The CCAP is composed of state and local actions to reduce GHG emissions within the unincorporated areas. The state actions include the Renewables Portfolio Standard, Title 24 Standards for Commercial and Residential Buildings (energy efficiency and CALGreen), Pavley/Advanced Clean Cars (vehicle efficiency), the Low Carbon Fuel Standard, and the California Cap-and-Trade Program. These state actions generally do not require action from the County but will result in local GHG reductions in the unincorporated areas. State actions mandated through legislation are responsible for achieving approximately 80 percent of the total GHG reductions identified in the CCAP.

There are 26 local actions included in the CCAP. The local actions are grouped into five strategy areas: green building and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting. Many of the local actions are cost effective, particularly in the green building and energy strategy area, with several energy efficiency investments that can recoup initial costs in one to five years. In addition to reducing GHG emissions, all local actions have many co-benefits, such as improved public health. Local actions are responsible for achieving the remaining 20 percent of the total GHG reductions targeted in the CCAP.

Project Consistency with the CCAP

If the proposed project is found to be consistent with the applicable provisions of the CCAP, it would not conflict with this GHG reduction plan. One simple test is whether a project is consistent with the growth forecasts of the CCAP, which were based on the regional growth forecasts developed by the Southern California Association of Governments (SCAG) for its 2012 updates of the regional air quality management and transportation plans. Those forecasts were based on a complex set of regional socioeconomic variables that are adjusted over time, and which consider the land use plans and policies of the local jurisdictions throughout the SCAG region, including the land use assumptions in the Los Angeles County General Plan. The GHG emissions forecasts do not represent estimates for GHG levels produced at individual properties throughout the County; rather, these are more general forecasts based on emission levels for categories of land uses that are aggregated together based on the total allocation of those land use categories throughout the unincorporated areas governed by the County. The proposed project is consistent with the County's General Plan Land Use designation of IL; therefore, it can be inferred that the project's emissions would not exceed the levels forecast by the CCAP.

Table 8-2 presents an assessment of project consistency with the main GHG reduction measures set forth in the CCAP. As shown, many of the reduction measures are aimed at public sector initiatives or at GHG sources that cannot be controlled by the proposed project and are not applicable. In other instances, the project would be consistent with the CCAP as designed, including several mandatory provisions of the State's Building Energy Efficiency Standards, the Green Building Code Standards, or the County's Code, and with some additional mitigation measures to address the policies and action strategies in a manner that can be implemented at the level of an individual development project. These mitigation measures represent efforts that go beyond compliance with existing regulatory standards and a commitment to go beyond "business as usual" in the design and construction of the proposed project. Implementation of these measures would reduce the project's total GHG footprint below the volumes noted in Table 8-1. Since the project would be consistent with those measures that can be practically addressed with the proposed warehouse/distribution facility, it is considered to be consistent with the CCAP and the project's GHG emissions would be less than cumulatively considerable and therefore less than significant.³⁰

Table 8-2 – Project Compliance with Los Angeles County Climate Action Plan

County Measure	Measure Description	Project Consistency
CATEGORY 1: GREEN BUILDING AND ENERGY		
Existing County Initiatives		
Energy Upgrades to Existing Structures	Provide rebates and incentives for energy retrofit efficiency projects.	Not Applicable. The proposed project does not include energy efficiency retrofits to any existing structures. All existing site improvements are to be removed.
Los Angeles County Code (Title 31)	Implement sustainable policies for new building design.	Consistent. The proposed project would implement a number of "sustainable" building design measures that are mandated by Title 31 of the County Code, by the 2016 California Green Building Standards Code, and

³⁰ See CCAP, p. 1-2, Figure 1-1.

County Measure	Measure Description	Project Consistency
		<p>an additional, voluntary measure, noted below as “Mitigation Measure 8-1.”</p> <ul style="list-style-type: none"> • Installation of built-in appliances that are Energy Star certified, per the CALGreen Code mandatory standards; • Recycling and/or salvaging for reuse at least 65 percent of all non-hazardous construction wastes, per the CALGreen Code mandatory standards; • Designing and constructing the warehouse roof to be “solar ready,” as required by the California 2016 Building Energy Efficiency Standards; • Mitigation Measure 8-1, which requires the use of “cool” roofing materials and coloring; and • Water conservation measures that include but are not limited to low flow fixtures. • PDF 8-1 requiring installation of pre-wiring for electric charging stations or plug-in by heavy duty trucks. • PDF 8-2 requiring the warehouse building roof to be solar ready.
Commercial Building Performance Partnership	Provide financial mechanisms for energy conservation upgrades to existing building.	Not Applicable. The proposed project does not include any energy conservation upgrades to existing structures. All existing site improvements are to be removed.
Renewable Energy and Clean Fuels Program	Implement projects to accelerate the use of compressed natural gas as an alternative fuel.	Not Applicable. This action requires broad-based efforts by government agencies, utility companies, and private entities that are beyond the scope of this project.
New CCAP Actions		
BE-1: Green Building Development	<p>Promote and incentivize at least Tier 1 voluntary standards within CALGreen for all new residential and nonresidential buildings.</p> <p>Develop a heat island reduction plan and facilitate green building development by removing regulatory and procedural barriers.</p>	Consistent. Promoting and incentivizing voluntary green building measures is aimed primarily at County actions. Per Mitigation Measure 8-1, a “cool roof” will be installed on the proposed building that will reduce the heat island effect. This involves a special layering/coating on the rooftop, to achieve a level of sunlight reflectivity, in accordance with a Solar Reflectance Index performance standard established in the CALGreen Building Code. In addition, PDF 8-1 requires installation of pre-wiring for electric charging stations or plug-in by heavy duty trucks and PDF 8-2 requires the warehouse building roof to be solar ready.
BE-2: Energy Efficiency	Energy efficiency retrofits for at least 25% of existing commercial buildings over 50,000 square feet and at least 5% of existing single-family residential buildings.	Not Applicable. The proposed project does not propose to retrofit any existing buildings.
BE-3: Solar Installations	Promote and incentivize solar installations for new and existing homes, commercial buildings, carports and parking areas, water heaters, and warehouses.	Consistent. Per the California 2016 Building Energy Efficiency Standards and PDF 8-2, the proposed building would be designed and constructed as “solar ready” for the potential future installation of a rooftop solar photovoltaic (PV) system.

County Measure	Measure Description	Project Consistency
BE-4: Alternative Renewable Energy Programs	Implement pilot projects for wind, geothermal, and other currently viable forms of alternative renewable energy.	Not Applicable. The implementation of this programmatic measure is primarily dependent on the County's Internal Services Department (ISD). However, as noted above, PDF 8-1 requires installation of pre-wiring for electric charging stations or plug-in by heavy duty trucks and PDF 8-2 requires the warehouse building roof to be solar ready.
BE-5: Wastewater Treatment Plant Biogas	Encourage renewable biogas projects.	Not Applicable. The proposed project does not include a wastewater treatment plant. Implementation of this emission reduction strategy will be achieved through the Los Angeles County ISD's partnerships with the operators of wastewater treatment facilities (CCAP, p. C-5).
BE-6: Energy Efficiency Retrofits of Wastewater Equipment	Encourage the upgrade and replacement of wastewater treatment and pumping equipment.	Not Applicable. The proposed project does not include a wastewater treatment plant. Implementation of this emission reduction strategy will be achieved through the Los Angeles County ISD's partnerships with the operators of wastewater treatment facilities (CCAP, p. C-5).
BE-7: Landfill Biogas	Partner with the owners and operators of landfills with at least 250,000 tons of waste-in-place to identify incentives to capture and clean landfill gas to beneficially use the biogas to generate electricity, produce biofuels, or otherwise offset natural gas or other fossil fuels.	Not Applicable. The proposed project does not include a landfill. Implementation of this emission reduction strategy will be achieved through the Los Angeles County ISD's partnerships with the operators of landfills (CCAP, p. C-5).
CATEGORY 2: LAND USE AND TRANSPORTATION		
Existing County Initiatives		
Healthy Design Ordinance	The HDO promotes (1) better walking environments with wider sidewalks, shade trees, and pedestrian thru-way connections; (2) more bicycling with short- and long-term bicycle parking; and (3) improved access to healthy foods through farmers markets and a community garden as a legally permitted use.	Consistent. The proposed project will maintain the existing public sidewalks that are alongside the Torrance Boulevard and Normandie Avenue frontages. Additionally, pursuant to Section 22.52.1225 of the County Code, the proposed plan includes inclusion of 11 short-term and 21 long-term bicycle parking spaces in the northwestern part of the site.
Bicycle Master Plan	Promote bicycle ridership and bike-friendly designs throughout the county.	Not Applicable. This is a programmatic measure to be implemented by the County.
Sustainable Transportation Programs	Implement sustainable transportation programs to increase the efficiency of the transportation network.	Not Applicable. This strategy is aimed at County initiatives.

County Measure	Measure Description	Project Consistency
New CCAP Actions		
LUT-1: Bicycle Programs and Supporting Facility Improvements	Construct and improve bicycle infrastructure to increase biking and bicyclist access to transit and transit stations/hubs. Increase bicycle parking and “end-of-trip” facilities.	Consistent. As a mandatory measure specified in Section 22.52.1225 of the County Code, the project would provide a total of 32 bicycle parking spaces on the project site. In addition, Mitigation Measure 8-2 will be imposed, per Section A5.106.4.3 of the California Green Building Code voluntary standards, which requires the installation of changing/shower facilities in order to provide “end-of-trip” space to change clothes after arriving by bicycle.
LUT-2: Pedestrian Network Improvements	Construct and improve pedestrian infrastructure to increase walking and pedestrian access to transit and transit stations/hubs. Program the construction of existing public sidewalks adjacent to the project site pedestrian projects toward the goal of that provide a pedestrian connection to a nearby bus stop at the northeast corner of Torrance Boulevard and pedestrian improvements/amenities per year. Normandie Avenue.	Neutral. This action is typically implemented by local governments through their capital improvement programs. The proposed project will maintain the stations/hubs. The proposed project will maintain the stations/hubs. Program the construction of existing public sidewalks adjacent to the project site pedestrian projects toward the goal of that provide a pedestrian connection to a nearby bus stop at the northeast corner of Torrance Boulevard and pedestrian improvements/amenities per year. Normandie Avenue.
LUT-3: Transit Expansion	Work with Los Angeles County Metropolitan Transportation Authority (LA and LA Metro) on a transit program that prioritizes to improve the countywide transit program or to transit by creating bus priority lanes, construct improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs.	Not Applicable. This action is applicable to the County Metro. This project would not affect any efforts to improve the countywide transit program or to transit by creating bus priority lanes, construct improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs.
LUT-4: Travel Demand Management	Encourage ride- and bike-sharing programs and employer-sponsored vanpools and future tenants to encourage and facilitate employer-shuttles. Encourage market-based bike sharing programs that support bicycle use initiated by those businesses. The proposed project around and between transit stations/hubs. includes 18 designated-ride sharing parking spots. Implement marketing strategies to publicize these programs and reduce commute trips.	Consistent. The Project Proponent will work with and employer-sponsored vanpools and future tenants to encourage and facilitate employer-shuttles. Encourage market-based bike sharing programs that support bicycle use initiated by those businesses. The proposed project around and between transit stations/hubs. includes 18 designated-ride sharing parking spots. Implement marketing strategies to publicize these programs and reduce commute trips.
LUT-5: Car-Sharing Program	Implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis.	Consistent. The action is applicable to employers who have a large number of employees on-site and can afford to fund such a program. Employer-based programs are meant to provide a means for business/day trips for alternative mode commuters and provide a guaranteed ride home option. The Project Proponent will work with future tenants to encourage and facilitate car-sharing programs that may be initiated by employers of those businesses. The proposed project includes 18 designated ride-sharing parking spots, which could be used to store shared vehicles.
LUT-6: Land Use Design and Density	Promote sustainability in land use design, including diversity of urban and suburban developments.	Consistent. The proposed project is located in an area that includes a mix of land uses, including residential, commercial, and industrial. The project site is conveniently located a short distance to two freeways (I-110 and I-405) to facilitate freight movement by trucks.

County Measure	Measure Description	Project Consistency
LUT-7: Transportation Signal Synchronization	Improve the network of traffic signals on the major streets throughout Los Angeles County.	Not Applicable. The proposed project does not include the installation of traffic signals and this measure is to be implemented by the County.
LUT-8: Electric Vehicle Infrastructure	Install 500 electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) and ensure that at least one-third of these charging stations will be available for visitor use.	Not Applicable. The proposed project does not include any County-owned public venues. Pursuant to Section A5.106.5.3 of the 2016 California Green Building Standards, the proposed project plans shall include specifications to install electric vehicle charging conduit within parking spaces adjacent to Torrance Boulevard. In addition, PDF 8-1 requires installation of pre-wiring for electric charging stations or plug-in by heavy duty trucks.
LUT-9: Idling Reduction Goal	Encourage idling limits of 3 minutes for heavy-duty construction equipment as feasible within manufacturer's specifications.	Consistent. Mitigation Measure 8-3 requires a three-minute idling limit for all heavy-duty construction equipment utilized during construction of the proposed project.
LUT-10: Efficient Goods Movement	Support regional efforts to maximize the efficiency of the goods movement system throughout the unincorporated areas.	Neutral. The proposed project would not alter any patterns of goods movement and any future tenant would be obligated to comply with applicable future County actions in relation to goods movement (CCAP, p. C-13).
LUT-11: Sustainable Pavements Program	Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation.	Not Applicable. This action applies to County efforts to maintain and rehabilitate aging roadways throughout the county.
LUT-12: Electrify Construction and Landscaping	Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	Consistent. Per Mitigation Measure 8-4, the project applicant shall require that contractors install temporary power poles of sufficient quantity to utilize electric-powered construction equipment. Additionally, Mitigation Measure 8-5 requires the inclusion of outdoor electrical receptacles for electrically powered/plug-in machinery use in landscape maintenance to be specified in the landscape plans.

CATEGORY 3: WATER CONSERVATION AND WASTEWATER

Existing County Initiatives

	Conservation rebates, smart gardening workshops, and stormwater controls	Not applicable. This measure does not apply to industrial projects.
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New CCAP Actions

WAW-1: Per Capita Water Use Reduction Goal	Meet the State established per capita water use reduction goal as identified by SB X7-7 for 2020.	Not Applicable. This action is to be achieved at the water supplier level, not at the specific plan/project level. The proposed project's water conservation measures will include low flow fixtures and toilets and the use of water-efficient landscape irrigation systems, as required by existing County codes.
WAW-2: Recycled Water, Water Supply Improvement Programs, and Stormwater Runoff	Promote the use of wastewater and gray water to be used for agricultural, industrial, BMPs for water quality control, including on-site and irrigation purposes. Manage stormwater, detention and treatment facilities. reduce potential treatment, and protect local groundwater supplies.	Consistent. The proposed project would implement BMPs for water quality control, including on-site and irrigation purposes. Manage stormwater, detention and treatment facilities.

County Measure	Measure Description	Project Consistency
CATEGORY 4: WASTE REDUCTION, REUSE, AND RECYCLING		
Existing County Initiatives		
	Recycling programs for community waste and construction and demolition waste that divert 50 percent of solid wastes to recycling or reuse instead of landfill.	Consistent. Pursuant to Section 5.408 of the 2016 California Green Building Code Standards, the project applicant shall submit a construction waste management plan or contract with an approved waste management provider to recycle and/or salvage and reuse a minimum of 65 percent of nonhazardous construction and demolition waste.
New CCAP Actions		
SW-1: Waste Diversion Goal	For the County's unincorporated areas, adopt a waste diversion goal to comply with all state mandates associated with diverting from landfill disposal at least 75% of the waste by 2020.	Consistent. This measure applies to the County's waste diversion goal to achieve a countywide waste diversion goal. The project would be consistent with this goal through the implementation of Mitigation Measure 8-6, which requires that both recycling and trash bins be included in on-site trash enclosures.
CATEGORY 5: LAND CONSERVATION AND TREE PLANNING		
Existing County Initiatives		
	Implementation of the urban forestry plan and oak woodlands conservation management plan.	Neutral. This action pertains to the County and there are currently no oak trees on the project site. However, the proposed Landscape Plan includes the planting of 127 trees on the project site.
New CCAP Actions		
LC-1: Develop Urban Forests	Support and expand urban forest programs within the unincorporated areas.	Neutral. This action pertains to the County. However, the proposed landscape plan includes the planting of 127 trees on the project site.
LC-2: Create New Vegetated Open Space	Restore and revegetate previously disturbed land and/or unused urban and suburban areas.	Not Applicable. The proposed project does not include previously disturbed land to restore.
LC-3: Promote the Sale of Locally Grown Foods and/or Products	Establish local farmers markets and support locally grown food.	Not Applicable. The proposed project is an industrial warehouse facility.
LC-4: Protect Conservation Areas	Encourage the protection of existing land conservation areas.	Not Applicable. The proposed project does not include any land conservation areas. The proposed project would not conflict with or impede the County's ability to implement this strategy for existing land conservation areas.

Sources: Los Angeles County CCAP 2015; VISTA Environmental 2018.

Mitigation Measures to Maintain Consistency with Community Climate Action Plan

Mitigation Measure 8-1: Prior to the issuance of the building permit, the permittee/applicant shall provide verification that the specifications for the proposed warehouse roof would utilize cool roofing materials with an aged reflectance and thermal emittance values that are equal to or greater than those specified in the 2016 CALGreen Building Standards Table A5.106.11.2.2 for Tier 1.

Mitigation Measure 8-2: Future tenant improvements plans shall be submitted for review and approval by the LACDRP, to verify the incorporation of changing/shower facilities for building occupants to encourage and facilitate bicycle commuting, pursuant to Section A5.106.4.3 of the California Green Building Code Standards, voluntary measures. These changing/shower facilities shall be installed and functional, prior to final tenant occupancy.

Mitigation Measure 8-3: Prior to the issuance of grading or building permits, the permittee/applicant shall provide verification that construction specifications establish a three-minute idling limit for all heavy-duty construction equipment utilized during construction of the proposed project. Signage shall be posted throughout the construction site regarding the idling time limit, and the construction contractor shall maintain a log for review by County inspectors. The log shall verify that construction equipment operators are advised of the idling time limit at the start of each construction day.

Mitigation Measure 8-4: The project's building permits shall require that contractors install temporary power poles of sufficient quantity to utilize electric-powered construction equipment that can accomplish the same work as gasoline or diesel-powered equipment at a similar level of efficiency, and to use battery-powered construction equipment, when available and capable of accomplishing the same work at a similar level of efficiency. This requirement shall be incorporated into the contract or contract specifications, which shall be submitted to LACDPW for review and approval.

Mitigation Measure 8-5: Prior to the issuance of the building permit, the project applicant shall indicate in the electrical plans the incorporation of outside electrical receptacles for use with landscape maintenance equipment.

Mitigation Measure 8-6: To assist in countywide efforts to divert recyclable wastes from landfill disposal that can produce GHGs when the wastes decompose, throughout the operating life of the project, the property owner shall provide both recycling bins and trash bins in all trash enclosures to assist with the separation of recyclables and trash.

In addition, consistency with the CCAP is supported through PDF 8-1 and PDF 8-2, as described above.

SCAG RTP/SCS Consistency

SCAG's Regional Council adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in April 2016. The 2016–2040 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic, and commercial limitations. The goals in SCAG's RTP/SCS are meant to provide guidance for considering the project within the context of regional goals and policies. Table 8-3 below provides an assessment of the project's relationship to SCAG's RTP/SCS goals. The analysis presented in Table 8-3 demonstrates that the project is consistent with the RTP/SCS.

SCAG develops transportation and housing plans that transcend jurisdictional boundaries that affect the quality of life for Southern Californian as a whole. SCAG's 2016-2040 RTP/SCS includes a focus on goods movement that is applicable to the project because the project proposes a warehouse distribution center in the SCAG region that would provide for a variety of distribution warehousing, and logistics tenants. The 2016-2040 RTP/SCS sets forth regional strategies to achieve an efficient movement of goods which states the following:

"The SCAG region is home to one of the largest clusters of logistics activity in North America. In 2014, the region had close to 1.2 billion square feet of facility space for warehousing, distribution, cold storage and truck terminals. Nearly 750 million square feet of this space, in 4,900 buildings, were facilities larger than 50,000 square feet. An estimated ten percent of the occupied warehouse space served port-related uses, while the remaining 90 percent supported domestic shippers. Many of these warehouses are clustered along key goods movement corridors. Port related warehousing is concentrated in the Gateway Cities subregion, while national and regional distribution facilities tend to be located in the Inland Empire." (SCAG, 2016a, p. 35)

The SCS/RTP further notes that:

“Consumers are increasingly demanding quicker fulfillment of their orders. More recent developments include same-day delivery options. To meet the same day delivery promise, distribution or fulfillment center proximity to population centers becomes critical. This is exemplified by large-scale e-commerce fulfillment center developments at the periphery of urban population centers. . . . Parcel hubs, delivery centers and accessibility to local streets and highways throughout the region will continue to be critical to e-commerce growth.”” (SCAG, 2016a, p. 35)

In addition, the SCS/RTP includes an Appendix devoted to Goods Movement Transportation System. (SCAG, 2016b). The project is a warehouse distribution center that is located approximately 10 miles from the Ports of Los Angeles and Long Beach, which serve “as the largest container port complex in the U.S and handled about 117 million metric tons of imports and exports in 2014— for a total value of about \$395.7 billion.” (SCAG, 2016a, p. 33). It is also located in close proximity to I-110, that provides for an efficient distribution of goods from the Ports to the warehouse/distribution center. Based on its location, vehicle miles traveled would be reduced due to the shorter distance from the Ports as compared to a similar warehouse distribution center located in the Inland Empire where most regional and national distribution centers tend to be located.

The 2016–2040 RTP/SCS is expected to reduce per capita transportation emissions by 8 percent by 2020 and 18 percent by 2035. This level of reduction would meet and exceed the region’s GHG targets set by CARB of 8 percent per capita by 2020 and 13 percent per capita by 2035.³¹ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS’s GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.³² The 2016–2040 RTP/SCS would result in an estimated 21 percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state’s GHG emission reduction goals through 2030 and thereafter.

The project’s consistency with SCAG’s RTP/SCS demonstrates that the project will be consistent with post-2020 GHG reduction goals. The 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State’s GHG emission reduction goals by meeting and exceeding the SB 375 targets. Further, as an infill development located near existing industrial uses such as the Ports, the project is the type of infill land use development located near existing infrastructure and development that is encouraged by the RTP/SCS to reduce regional VMT. By furthering implementation of SB 375, the project supports regional land use and transportation GHG reduction strategies consistent with State climate targets beyond 2020.

As shown in Table 8-3, the project is consistent with the goals 2016 –2040 RTP/SCS.

Table 8-3 – Project Consistency with 2016-2040 RTP/SCS

RTP/SCS Goals	Consistency
Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent: The project will revitalize a currently vacant site that was formerly used for temporary storage and transport of hazardous and non-hazardous waste materials into a warehouse/distribution center. The project will create approximately 140 full time jobs and will improve regional economic development.

³¹ SCAG, Final 2016–2040, RTP/SCS, Executive Summary, p. 8, April 2016.

³² SCAG, Final Program Environmental Impact Report for 2016–2040, RTP/SCS, April 2016, Figure 3.8.4-1.

RTP/SCS Goals	Consistency
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	Consistent: The project would provide a warehouse distribution center in close proximity to the Ports of Los Angeles and Long Beach and is located on established trucking routes along the I-110 corridor. This would maximize goods movement in the region. As explained in the traffic analysis for the project, there will be a less-than-significant impact on traffic congestion as a result of the project. As an infill development located near existing industrial uses such as the Ports, the project is the type of infill land use development located near existing infrastructure and development that is encouraged by the RTP/SCS to reduce regional VMT.
Goal 3: Ensure travel safety and reliability for all people in the region.	Consistent. As explained in the traffic analysis for the project, there will be a less-than-significant impact on traffic operations and emergency access as a result of the project. The project will therefore not impact travel safety or reliability for the region.
Goal 4: Preserve and ensure a sustainable regional transportation system.	Consistent. As explained in the traffic analysis for the project, there will be a less-than-significant impact on traffic operations and emergency access as a result of the project. The project will therefore not impact travel safety or reliability for the region. In addition, PDF 8-1 requires installation of pre-wiring for electric charging stations or plug-in by heavy duty trucks.
Goal 5: Maximize the productivity of our transportation system	Consistent. The project is located approximately 10 miles from the Ports of Los Angeles and Long Beach on the I-110 corridor. This location is ideal for a warehouse distribution center and will minimize the length of truck trips from the Port to a warehouse distribution center. The project will not have any significant impacts on traffic, as explained in the Traffic Impact Analysis prepared for the project.
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The project will have a less-than-significant impact on air quality. The project will provide for 32 bicycle parking and Mitigation Measure 8-2 will be imposed, per Section A5.106.4.3 of the California Green Building Code voluntary standards, which requires the installation of employee lockers and a private changing area (including a shower), in order to provide “end-of-trip” facilities. The project will also construct fullwidth sidewalk along the property frontage on Normandie Avenue and Torrance Boulevard, and will provide landscaping along both street frontages which will improve the walkability of the area. In addition, PDF 8-1 requires installation of pre-wiring for electric charging stations or plug-in by heavy duty trucks.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	Consistent. The project County’s Green Building Standards Code, which mandates compliance with the California 2016 Building Energy Efficiency Standards for Non-Residential Buildings. These standards are among the most stringent in the United States and ensure that the design, construction, and operations of the building shell, and later tenant improvements, will incorporate highly efficient energy practices regarding building envelopes, ventilation, space conditioning (insulation)

RTP/SCS Goals	Consistency
	and service water heating systems and equipment, and commissioning efforts to achieve the required building energy performance standards.
Goal 8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. This project is consistent with the General Plan and zoning designation for the site and would provide a new warehouse distribution center in an ideal location for regional goods movement. It would not affect any efforts to improve the countywide transit program or to construct improvements to facilitate access to transit facilities. As noted above, the project includes 32 bicycle parking spaces, employee lockers and a private changing area, and new sidewalks along Normandie Avenue and Torrance Boulevard that will provide walkable connections to transit.

References:

County of Los Angeles. 2015. *Community Climate Action Plan*.

SCAG, 2016. 2016-2014 RTP/SCS, available here:

<http://scagtrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>

SCAG, 2016: Goods Movement Appendix available here:

http://scagtrtpscs.net/Documents/2016/final/f2016RTPSCS_GoodsMovement.pdf

VISTA Environmental. 2018. *Bridge Point South Bay II Warehouse Project, Air Quality, GHG Emissions and HRA Impact Analysis*.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires, because the project is located:				
i) within a Very High Fire Hazard Severity Zones (Zone 4)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) within a high fire hazard area with inadequate access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) within an area with inadequate water and pressure to meet fire flow standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) within proximity to land uses that have the potential for dangerous fire hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Does the proposed use constitute a potentially dangerous fire hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) ***Less Than Significant Impact.*** The project is a warehouse/distribution center that will allow for storage and transportation of finished or partially finished goods and materials, excluding any significant quantities of hazardous substances, to customers located throughout southern California. There would also be some ancillary office space for administrative, sales or other office-oriented activities associated with the primary businesses. The project does not include fuel storage or dispensing facilities and also does not involve any heavy manufacturing uses. Thus, once the proposed warehouse is fully operational, it is anticipated that there would be some limited transport, handling, and disposal of hazardous substances that are typically associated with warehouse types of uses. This may include but is not limited to the use of small quantities of common chemical substances found in offices and warehouse spaces, such as toners, batteries, paints, lubricants, restroom cleaners, and other maintenance products. Transport, storage, use, and disposal of these materials is commonplace in businesses of all types, is not specifically regulated by the Los Angeles County of Los Angeles Fire Department (LACoFD) and does not represent a significant threat to the environment or public health. Project impacts would, therefore, be less than significant.
- b) ***Less Than Significant with Mitigation Incorporated.*** As discussed in the preceding response, the proposed warehouse operations would not involve activities that could result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment. This discussion regarding threshold 9b), therefore, focuses on potential impacts that could occur during site demolition and construction activities. Impacts could occur if there were an accidental release of hazardous materials from disturbance of existing site improvements and subsurface materials that are known to be contaminated or which could result in unexpected disturbances of unknown contamination that may exist. This discussion also addresses potential releases of hazardous substances during the course of 'normal' construction activities that could occur at virtually any construction site.

Potential Impacts During Building Demolition Activities

Based on the age of the on-site structures, which were built between 1947 and 1967, when asbestos materials were still allowed in building construction for insulation, and prior to enactment of regulations restricting the use of lead-based paints, there is the potential for asbestos-containing materials (ACMs) and lead-based paint (LBP) to be disturbed during demolition of those structures. As such, project implementation would require the retention of a qualified asbestos and LBP specialist to conduct a pre-demolition survey to detect any potential ACMs or LBP. If ACMs are present, the project applicant must comply with the SCAQMD Rule 1403 for the removal of asbestos during demolition and renovation activities. In general, the SCAQMD Rule 1403 requires that projects with suspected or known asbestos-containing building materials (ACBMs) include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfiling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. Additionally, the California Health and Safety Code Subsection 105250 outlines lead abatement safety measures, and during demolition, this requires a contractor to identify all surfaces and follow strict lead abatement requirements in relation to lead-based paint. This includes a written lead compliance program, frequent testing, and the use of equipment to minimize lead dust and fumes.

Compliance with these existing regulations would reduce potential impacts involving removal of ACBMs and lead to less than significant. Mitigation Measures 9-1 and 9-2 will be imposed, to require pre-construction surveys to determine the presence of ACBMs or lead paint in the on-site structures and if present, all remedial measures required under SCAQMD Rule 1403 and California Health and

Safety Code Section 105250 would apply. This would reduce potential impacts associated with demolition and removal of contaminated building materials to less than significant.

Potential Impacts Associated with Typical Construction Activities

Site development would involve a range of typical construction activities that would include the use of common hazardous materials, substances, or chemicals such as fuels, oils, lubricants, paints, concrete, solvents, and glues. Without appropriate good housekeeping measures, there is a potential for an accidental release of hazardous substances and/or water pollutants during various construction activities. This could occur from any of the following:

- Fueling and re-fueling of construction machinery;
- Pouring, curing and finishing of concrete;
- Paving and grinding of existing pavement surfaces; and
- Vehicle cleaning and maintenance.

As part of the Stormwater Pollution Prevention Plan (SWPPP) that must be prepared to obtain a General Construction Permit from the Los Angeles Regional Water Quality Control Board (LARWQCB), measures to prevent discharges of hazardous materials, and to be prepared to respond quickly and effectively to accidental spills and releases, will be identified and implemented by the responsible contractor(s). For example, discharges of construction materials and wastes such as paints and fuels resulting from dumping or spills that come into contact with rainwater or stormwater runoff is prohibited. A variety of BMPs are proposed as part of this project's SWPPP to prevent releases of hazardous substances from the sources noted above. Examples of these BMPs include:

- Fueling of construction machinery must occur on level ground, with drip pans and/or absorbent pads, at least 50 feet away from any drainage inlets.
- Pouring, curing and finishing of concrete will be avoided just prior to or during any rainstorms. Ensure that concrete curing materials are properly stored and maintained, that rainwater cannot come into contact with such areas, and that there are collection and wash-out areas provided to prevent runoff-off of concrete curing or waste materials.
- Cover any drainage inlets or culverts near paving areas and immediately sweep and clean such areas after paving is completed.
- Restrict vehicle cleaning or vehicle maintenance to appropriate off-site locations or ensure that such activities occurring on-site shall be located in specially designated areas, on level ground at least 50 feet away from any drainage facilities, with appropriate drip pans and absorbent pads. Cleaning of vehicles and equipment with soap, solvents or steam should not occur on the project site unless resulting wastes are fully contained and properly disposed of. Resulting wastes should not be discharged or buried and must be captured and recycled or disposed of properly. Facility wash racks, if any, should discharge to a sanitary sewer, recycle system or other approved discharge system and must not discharge to the storm drainage system, watercourses, or to groundwater.

This routine General Construction Permit procedure would ensure that adequate precautions are in place to avoid a significant impact related to hazardous materials as a result of construction activities. A copy of the proposed SWPPP, with proposed BMPs to prevent water pollution or accidental releases of hazardous substances and wastes during construction is provided in Appendix K.

Potential Impacts from Disturbance of Contaminated Soils Resulting from Past Land Use Activities On and Off-Site

To determine the nature and extent of any land or groundwater contamination that may have occurred due to past land use activities on- or off-site, environmental site assessments were conducted at the project site on several occasions, over the last 10 to 15 years. Assessments included review of historical property records, regulatory agency records searches, site field reconnaissance, soil and soil gas testing, ground water testing, and preparation of Human Health Risk Assessments. Results of those assessments are summarized below.

Ardent Environmental Group Inc. completed a Phase I Environmental Site Assessment (ESA) in December 2017 on the subject site to identify any recognized environmental conditions (REC), controlled recognized environmental conditions (CRECs), and historical recognized environmental conditions (HRECs) associated with the project site. American Society of Testing Materials (ASTM) E1527-13 standards define an REC as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property (1) due to release to the environment; (2) under conditions indicative of a release to the environment; and/or (3) under conditions that pose a material threat of a future release to the environment. An HREC refers to a past release that has been remediated below residential standards and given regulatory closure with no use restrictions. A CREC is a new term introduced in the ASTM E1527 standard to address contaminated sites that have received risk-based regulatory closure, where no further remediation is required but residual contamination is controlled although could still pose ongoing or future obligations on the owner (such as special precautions during grading activities). The Phase I ESA consists of historical property use research, a regulatory agency records search, and site reconnaissance in accordance with the ASTM E1527-13 standards. A copy of the Phase I ESA is provided in Appendix F of this Initial Study.

As part of the Phase I ESA, Ardent established the historical land uses at the site by reviewing numerous documents and sources, including historical aerial photographs, historical fire insurance maps, historical city directories, building permits and plans, topographic maps, property tax records, zoning/land use records, and a prior Phase I ESA that was prepared regarding the site. Findings regarding the site's land use history are summarized below.

From at least 1928 through 1938, the site was used for agricultural purposes. From approximately 1954 through 2010, a manufacturing and distribution facility for a liquid coatings business operated on-site. Originally, the business was the Finch Paint & Chemical Company, but a later business merger changed the name to Bostick-Finch, Inc. In 1984, Akzo Coatings, Inc. purchased the liquid coatings company and engaged in manufacturing paint coatings and epoxies for the aerospace industry. In 1992, ECI, a hazardous and nonhazardous waste transportation business, purchased the southern five acres of the site. Several years later, ECI purchased the remaining portions of the property and occupied the entire site until vacating in December 2017. Throughout the years, other small businesses—for example, a plastics company, a roofing company, and automobile maintenance services—also occupied the site.

Former Underground Fuel Storage Tank

In 1989, a 4,000-gallon steel UST was removed from the project site under the direction of the LACDPW. The tank was located in the mid-portion of the site between a storage building and wash rack. The tank was used to store gasoline and had been out of service since 1974. Soil samples were collected and analyzed by LACDPW; based upon the result of the samples, LACDPW determined there was no impact to soils and issued a no further action determination. Based on this, no significant impacts are anticipated due to excavation in this area.

Seventeen (17) USTs were installed on-site in two areas that are referred to as Tank Farm Nos. 1 and 2, along the southern portion of the property. These tank farms were associated with the liquid coatings businesses previously operating on-site. A variety of chemicals were stored in these tanks; the full compendium is contained in the Phase I ESA in Appendix F of this Initial Study. In 1989, the 17 USTs were removed. Prior to removal of the tanks, elevated levels of VOCs were detected, and following additional site characterization, soil remediation was implemented, which included the installation and operation of a soil vapor extraction system. In addition, groundwater was characterized, which included the installation of groundwater monitoring wells. Groundwater was assessed to be impacted, although to a lesser extent than the soil. The remedial work was completed under the direction and oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). No groundwater remediation was deemed necessary and the LARWQCB issued a no further action determination for the tank farms on July 22, 1996. Based on this, no significant impacts are anticipated due to excavation in this area.

Montrose Superfund Site

A former pesticide manufacturing facility known as the Montrose Plant is located approximately 0.35 miles north of the site, just northeast of the intersection of Normandie Avenue and Del Amo Boulevard. The Montrose facility manufactured pesticides, including the highly toxic product known as DDT (dichlorodiphenyl-trichloroethane), from its beginning in 1947 until the summer of 1982. During Montrose's operations, DDT and other hazardous substances were released in to the environment at and from the Montrose plant property. These releases collectively impacted the groundwater beneath the site and in the vicinity with VOCs, pesticides, polynuclear aromatics, and metals. In 1953, City of Los Angeles officials discovered ponded process wastewater from the Montrose Plant, at the corner of 204th Street and Kenwood Avenue, north of the project site. On October 4, 1989, the USEPA placed the Montrose plant site on the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) National Priorities List, designating it as the Montrose Chemical Superfund Site.

Up to the 1960s, stormwater discharge from the former Montrose facility would flow in a southerly direction through unlined channels north of the project site and discharge in a slough onto the easterly portion of the site. These waters would continue off-site in a southeasterly direction. For decades, flooding occurred from time to time along this drainage pathway. In the early 1960s and late 1970s, an underground concrete culvert was installed by the LACFCD to replace a portion of the historical stormwater pathway, including the Kenwood Ditch and the portion traversing the eastern portion of the project site. This underground drainage structure within the project site is currently covered by approximately 19-20 feet of fill material.

Based on past site investigations conducted by the previous landowner (ECI) and by USEPA, DDT and other contaminants have been detected in the eastern part of the site, where the former slough conditions occurred and where runoff of contaminants from the Montrose Plant flowed through the site.

ECI conducted soil sampling on-site in February 2005 and found concentrations of DDT that exceeded regional background concentrations in samples collected in the area of the historical stormwater pathway. Later in 2005, ECI excavated soils around the historical stormwater pathway and stockpiled the soils on the site. The extent and location of the stockpiled soils was not documented during the 2005 excavation activities. However, it is documented that, pursuant to a USEPA Administrative Order and under USEPA's supervision, ECI transported the stockpiled soils for offsite disposal. In 2006 and 2007, USEPA performed soil investigations at the project site and found DDT concentrations along the historical stormwater pathway at 8 to 24 feet below the ground surface. More than 20 percent of the samples exceeded regional background concentrations, some by a magnitude of 28:1. Other hazardous substances were also detected in the soil, including VOCs and petroleum hydrocarbons.

ECI Remediation Activities and Former Business Operations

Between July 2013 and March 2015, ECI conducted soil and soil-gas investigations, mainly in the middle to western portions of the site, and found a variety of hazardous substances, including VOCs, petroleum hydrocarbons, pesticides and metals. In February 2014, ECI entered into a Voluntary Cleanup Agreement with the DTSC to address contamination found on-site. In June 2015, DTSC approved a Removal Action Work Plan, which contained ECI's plans to excavate, transport, and dispose of approximately 10,000 to 20,000 cubic yards of soil from the site. In July 2015, ECI excavated approximately 8,000 cubic yards of soil contaminated with DDT within the eastern part of the site, along the historical stormwater pathway. The excavated soils were stockpiled on-site and improperly covered for a number of months. Following numerous complaints from nearby residents regarding dust from the stockpiles, noise and ground shaking from the excavation work, the USEPA issued an Administrative order on October 30, 2015 requiring, among other things, adequate coverage of the soil stockpiles. Pursuant to that order, ECI disposed of the soil stockpiles off-site and backfilled the excavated areas. Some or all of the hazardous substances described above still remain in the soils across the project site. As described below, the developer has entered into a binding agreement with the USEPA to govern the redevelopment of the project site and to complete the additional work to address the site contaminants and provide protections for nearby residents.

ECI's operations include the storage of roll-off containers, vacuum trucks, and aboveground storage tanks (AST) used to transport hazardous and nonhazardous wastes. Two ASTs were located next to the maintenance building in the northwestern part of the site and a third was located in the former fueling area, between a storage building and the clarifier wash rack area in the central part of the site. No hazardous wastes were stored on-site at the time of the environmental site assessments conducted by Ardent (2017). Some nonhazardous soils were temporarily stored in roll-off bins in the southeastern portion of the site. The buildings in the northwestern portion of the site were used for training purposes, equipment maintenance, and storage. An office building is located in the western portion of the site. A maintenance building was used for repairing and maintaining trucks and equipment. No underground features, such as waste oil USTs, clarifiers, floor drains, hydraulic lifts, or sumps, were noted or reported to have been used in these areas. The maintenance building, and other on-site buildings in the northwestern portion of the site, are suspected to be connected to septic systems, although site personnel and regulatory documents could not confirm this. The office building is connected to a septic system. Based on the information obtained during this assessment, the maintenance building is not considered an environmental concern to the site. However, septic systems that would require proper removal might be encountered during demolition or grading activities. To address this concern, one of the specifications in the SMP (Mitigation Measure 9-3) will require further investigation and proper abandonment/cleanup procedures, should remnants of a septic system be found.

ECI also used a wash rack located in the west-central portion of the site. The wash rack was used to clean trucks and equipment. However, while not discovered during the site investigations, this system might also be connected to a septic system. In June 2017, Ardent performed soil sampling in this area. Laboratory results indicated no detectable concentrations of petroleum hydrocarbons and VOCs, and no detectable to low concentrations of metals, well below the State and Federal regulatory human health risk screening levels and background concentrations. Based on this information, the wash rack was not classified an environmental concern to the site.³³

³³ DTSC Envirostor website for Ecology Control Industries (former Akzo Sikkens Facility (60001994) - https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60001994

USEPA Administrative Settlement Agreement and Order on Consent for Removal Actions

Pursuant to the provisions of CERCLA, the project applicant has entered into an agreement with the USEPA (USEPA Settlement Agreement) to govern the redevelopment of the subject property and to complete additional work to address site contaminants and provide protections for nearby residents. There are four components to the agreement, which is included as Appendix H:

- 1) Payment of past response costs incurred by USEPA. This has been completed.
- 2) Preparation of a Baseline Human Health and Ecological Risk Assessment to characterize and quantify the current and potential human health and environmental risks that would occur if no further remedial action is taken. The Risk Assessment is to be prepared in accordance with the latest applicable USEPA guidance, directive and procedures. This assessment has been completed and was approved by the USEPA in May 2018 and accepted by DTSC in July 2018.³⁴ The risk assessment findings are summarized below.
- 3) A restrictive covenant shall be recorded for the entire subject property, to prohibit any use of the project site for residential purpose, to prohibit any soil disturbing activities without an approved SMP and prohibit any removal of contaminated soils without an approved SMP. USEPA approved the SMP on April 24, 2019. The restrictive covenant will be approved by USEPA and will be recorded prior to the County's issuance of a grading permit for the proposed project.
- 4) Construction of a concrete or concrete-like wall and an adjacent landscape zone to provide a barrier against dust and noise from the project site, along the entire eastern side of the project site. This would occur in the first phase of project construction and would serve as a construction noise barrier for subsequent demolition and construction activities on-site.

Findings of Human Health Risk Assessments

In general, the soil in the eastern portion of the site is impacted with DDT and other chemicals from surface to at least 25 feet below the ground surface. The proposed grading plan would excavate subsurface materials in that impacted area. A variety of environmental contaminants have been detected in samples collected in the soil and in soil vapor, throughout the site, between 2013 and 2017. The vast majority of these have been detected at concentrations well below federal and state regulatory screening levels, as shown in Tables 9-1 and 9-2, below. The USEPA screening levels were developed to protect human health from risks involving dermal contact, incidental ingestion and inhalation of dust for soil, and for vapors in ambient air. These are based on conservative toxicity values, exposure scenarios (i.e., residential or industrial/commercial) and a 10^{-6} cancer risk and a non-cancer hazard index of 1. The DTSC also provides screening levels for select chemicals where they believe more conservative toxicity values should be applied. Concentrations at a given site that exceeds these screening values indicate that a possible unacceptable health risk is present and further assessment, such as the completion of an HHRA may be warranted.

As shown in Table 9-1, concentrations in the soil were all well below the screening thresholds. As shown in Table 9-2, all soil vapor concentrations were below initial screening levels, but there were six instances where the measured concentrations of soil vapor gas contaminants exceeded federal secondary screening levels. Those exceedances involved 1,1-DCA, Benzene, Bromodichloromethane, Chloroform, TCE, and Ethylbenzene. The secondary screening thresholds for soil gas are based on the USEPA's ambient air

³⁴ DTSC letter dated July 31, 2018 "Approval of Data Evaluation and Human Health Risk Assessment Report for Former Ecology Control Industries Facility 20846 Normandie Avenue, Torrance, California, available here: https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4731020867/Bridge%20Point%20LLC%20-%20HHRA%20Approval%20Letter-July%202018.pdf

screening levels modified with a sub-slab attenuation factor for residential properties. Since the USEPA does not have an attenuation factor for commercial properties, this attenuation factor is highly conservative, but helps account for cumulative health risks from multiple chemicals. This attenuation factor is not typically applied to commercial properties, but it was applied to the project site at the request of the USEPA.

Table 9-1 - Maximum Concentrations of Contaminants Detected in Soil and Regulatory Screening Levels

Detected Chemical in Soil	Maximum Concentration Detected in Soil (mg/kg)	Regulatory Screening Levels (mg/kg)	
		USEPA-RSLi	DTSC-SLi
4,4-DDT	0.75	8.5	NA
4,4-DDD	0.37	9.6	NA
4,4-DDE	0.23	9.3	NA
alpha-BHC	0.0016	0.36	NA
beta-BHC	0.00016	1.3	NA
alpha-Chlordane	0.0039	NA	NA
gamma-Chlordane	0.0049	NA	NA
Chlordane	0.049	7.7	1.5
Endosulfan II	0.0025	7,000	NA
Endrin	0.0022	250	NA
Endrin Aldehyde	0.0038	NA	NA
Heptachlor Epoxide	0.00015	0.33	NA
DEHP	0.33	160	NA
cis-1,2-DCE	0.058	2,300	86
trans-1,2-DCE	0.075	23,000	600
PCE	0.082	100	2.7
TCE	0.039	6.0	NA
Vinyl Chloride	0.022	1.7	0.15
TPHg	510	2,200	NA
TPHd	260	440	NA
TPHo	2,700	3,500,000	NA

Notes:

4,4-DDT - 4,4'-dichlorodiphenyltrichloroethane

4,4-DDD - 4,4'-dichlorodiphenyldichloroethane

4,4-DDE - 4,4'-dichlorodiphenyldichloroethylene

PCE - tetrachloroethylene

TCE - trichloroethene

TPHg - total petroleum hydrocarbons as gasoline

TPHd - total petroleum hydrocarbons as diesel

TPHo - total petroleum hydrocarbons as oil

mg/kg - milligrams per kilogram

BHC - benzene hexachloride

DEHP - bis(2-ethylhexyl)phthalate

cis-1,2-DCE - cis-1,2-dichloroethene

trans-1,2-DCE - trans-1,2-dichloroethene

NA - not available

USEPA-RSLi - USEPA Regional Screening Levels for industrial/commercial soils, dated November 2017

DTSC-SLi - Department of Toxic Substances Control, Human and Ecological Risk Office Note 3, screening levels for industrial/commercial soils, dated January 2018

Table 9-2 - Maximum Concentrations of Contaminants Detected in Soil Gas and Regulatory Screening Levels

Detected VOC in Soil Gas Sample	Maximum Concentration Detected in Soil Gas (µg/l)	Regulatory Screening Levels (µg/l)		
		DTSC-SLi	USEPA-RSLi (initial screen)	USEPA-RSLi (secondary screen)
1,1-DCA	0.271	15.4	15.4	0.257
1,1-DCE	0.380	620	1,760	29.3
cis-1,2-DCE	0.737	70	NA	NA
PCE	1.57	4.0	94.0	1.57
Freon 113	0.230	NA	44,000	733
Benzene	0.0961	0.840	3.2	0.053
Bromodichloromethane	0.019	0.660	0.660	0.011
1,2,4-TMB	0.280	NA	520	8.67
1,3,5-TMB	0.076	NA	520	8.67
Toluene	7.81	620	44,000	733
4-Methyl-2-Pentanone	0.012	NA	26,000	433
Xylenes	6.98	NA	880	14.7
Chloroform	0.086	NA	1.06	0.018
Chloromethane	0.0075	NA	780	13.0
Dichlorodifluoromethane	0.023	NA	880	14.7
TCE	0.490	NA	6.0	0.100
1,1,1-TCA	0.00502	8,800	44,000	733
Trichlorofluoromethane	0.022	10,600	NA	NA
Carbon Disulfide	0.140	NA	6,200	103
Acetone	0.083	NA	280,000	4,667
2-Butanone	0.020	NA	44,000	733
Ethylbenzene	1.43	NA	9.8	0.163
n-Butylbenzene	0.045	NA	NA	NA

Notes:

Bolded contaminants and concentrations indicate exceedance of USEPA's secondary screening thresholds.

VOC - volatile organic compound

µg/l - micrograms per liter

1,1-DCA - 1,1-dichloroethane

1,1-DCE - 1,1-dichloroethene

cis-1,2-DCE - cis-1,2-dichloroethene

PCE - tetrachloroethylene

Freon 113 - 1,1,2-Trichloro-1,2,2-trifluoroethane

1,2,4-TMB - 1,2,4-trimethylbenzene

1,3,5-TMB - 1,3,5-trimethylbenzene

TCE - trichloroethene

NA - not available/not applicable

DTSC-SLi - Department of Toxic Substances Control, Human and Ecological Risk Office Note 3, modified screening levels for ambient industrial/commercial air calculated for soil gas using the DTSC attenuation factor for a future industrial/commercial building (0.0005) with the samples collected close to the contamination source, dated August 2017. DTSC attenuation factors are based on the DTSC Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, dated October 2011.

USEPA RSLi - USEPA Regional Screening Levels for ambient industrial/commercial air calculated for soil gas using the DTSC attenuation factor of 0.0005 as an initial screen, and the USEPA attenuation factor for a residential building (0.03) as a secondary screen, with samples collected close to the contamination source, dated June 2017. USEPA does not provide an attenuation factor for industrial/commercial properties. USEPA attenuation factors based on the USEPA Office of Solid Waste and Emergency Response Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air, dated June 2015.

Since measured concentrations of the six chemicals in soil vapor exceed the applicable health-based secondary screening levels, a further evaluation using the USEPA Johnson & Ettinger model was conducted, as required by USEPA protocols. This evaluation requires preparation of a HHRA, which was completed by Ardent in May 2018, in accordance with USEPA specifications. The HHRA evaluated the concentrations of residual DDT and other chemicals discovered at the site and assessed VOC concentrations in soil gas. The HHRA is provided in Appendix G of this Initial Study and was approved by both the USEPA and the DTSC. The HHRA uses site specific data to further evaluate whether a human health risk is present, based on individual chemicals as well as cumulative effects (being exposed to more than one carcinogen results in an increased risk of getting cancer). Based upon this further evaluation, Ardent calculated the cumulative cancer risk to be 4.2×10^{-8} for future construction workers and 2.7×10^{-7} for future occupational workers. The cumulative non-cancer hazards were calculated to not exceed the cancer risk or hazard index risk and was calculated to be 0.3 for future construction workers and 0.1 for future occupational workers. These cumulative risk values were below the target cancer and hazard index of 10^{-5} and 1, respectively. These results indicate that the cumulative risk values do not represent an unacceptable risk; therefore, there would not be a significant human health risk to future occupational and construction workers on-site.

The HHRA was completed to assess risks to construction workers and or future occupants at the project site. Ardent compared the risk values to acceptable values for residential properties (i.e. an incremental lifetime cancer risk of 10^{-6} and non-cancer hazard index of 1). Based on this evaluation, Ardent concluded that the chemical concentrations in soil at the site would not pose an unacceptable health risk through inhalation of dust during construction activities to a hypothetical on-site resident. Given that the HHRA indicated there is not a significant health risk to occupants and workers in direct contact with the chemicals detected at the site, there is a low likelihood that a significant health risk is present to occupants of adjoining properties. As a precautionary measure, grading activities will be monitored for VOCs in accordance with AQMD Rule 1166 and for dust in accordance with AQMD Rule 1466 to verify that the neighboring properties are not adversely affected. These monitoring efforts will be included in the required SMP (Mitigation Measure 9-3), as discussed below.

Given the low concentrations of contaminants measured at the site and the findings of the HHRA, the proposed grading plan would retain these soils on-site, covered by impervious surfaces associated with parking and driveway areas. This would prevent stormwater infiltration into the contaminated soil layers and prevent direct human contact with those subsurface materials. DDT is not volatile and would not migrate to the ground surface. Proposed landscape areas in the northeast corner and along the new east boundary wall would provide erosion control, minimize infiltration and would not be a place where people would gather. A secured gate at the northeastern driveway along Torrance would prevent site access by anyone but on-site employees or vendors, further limiting potential human contact within the landscaped areas of the site. The project plans and the HHRA have been reviewed by both the USEPA and DTSC and both agencies have concurred with the findings (correspondence from both agencies on this matter is provided in Appendix G of this Initial Study). Nonetheless, pursuant to the terms of the Settlement Agreement, an SMP will be implemented to provide oversight and monitoring of grading activities to ensure that there are no releases of contaminated soils in dust generated by grading, and to implement further control measures in the event that unknown contaminants are encountered.

Mitigation Measure 9-3 refers to the SMP that has been approved by USEPA, which provides the specifications for the SMP. It includes implementation of SCAQMD's Rule 1466 which applies to excavation of soils that are impacted with certain pesticides (including DDT) and/or metals. The activities associated with this Rule include monitoring for dust particulars in an upwind and downwind direction to make sure large quantities of dust are not leaving the site boundary. Other precautionary measures include monitoring wind speed and direction, fencing the excavation area with filtered wind screen, covering stockpiled soil with Visqueen plastic, and suppressing dust with water. If excess dust is found to be leaving

the site or increased wind speeds are measured, excavation activities will be ceased. Excavation will continue when proof of dust control is shown and/or if wind speeds subside.

As shown in Table 9-2, earlier, the soil vapor concentrations measured at the project site are well below initial screening levels and, based on the HHRA, do not pose an unacceptable health risk to future occupational and construction workers on-site through vapor intrusion. Nonetheless, as a precautionary measure, the SMP to be implemented during grading will include air monitoring of the soils for VOCs, in accordance with SCAQMD's Rule 1166.

Soil Management Plan

The SMP, which was approved by USEPA, (see Appendix I of this Initial Study) specifies the manner and implementation of monitoring grading activities and identification and management of unknown environmental concerns that might be encountered during site grading and development. The SMP provides procedures for the effective and prompt communication of the discovery of unknown environmental concerns to the responsible party during site grading and development. Compliance with the SMP, along with the Health and Safety Plan (HASP), will control the exposure of on-site construction workers and the general public to dust, vapors, or odors associated with the site grading operations. The SMP also specifies the procedures to sample import fill material that might be used at the site, if necessary, to replace soils that are determined to be unsuitable due to contamination or other properties.

In addition, to ensure that sensitive receptors, such as residences, hospital, or day-care centers are not constructed on the site, pursuant to Mitigation Measure 9-4 the County will not issue a certificate of occupancy until a land use covenant that prohibits any noncommercial or nonindustrial land uses in the future is recorded against the property. This measure fulfills a term of the USEPA Settlement Agreement. With Mitigation Measures 9-3 and 9-4, risks of environmental or human health impacts to construction workers, future warehouse occupants and neighboring land uses associated with disturbance of contaminated soils found on-site would be reduced to less than significant.

As discussed above, the soil vapor concentrations measured at the project site are generally well below USEPA regulatory action levels, with six samples that exceeded secondary federal screening levels. Based on the analysis in the HHRA approved by USEPA and DTSC, and with the proposed mitigation measures, VOC concentrations would not be considered a human health risk to construction workers or neighboring land uses, or a potential impact to future building occupants through vapor intrusion.

Adjacent Former Landfill Site

Between 1956 and 1985, the property immediately southeast of the site, known as the "Royal Boulevard Disposal Site," operated as a Class III landfill. It has been closed for many years and is now undeveloped land with a low vegetation covering most of the ground surface and a roadway through the middle of the site. It is owned and maintained by the LACFCD. Materials disposed of at this property included nonhazardous slag, reclaimed foundry sand, and other inert metallic wastes. Investigations were overseen by the DTSC, which concluded that no hazardous constituents existed in the waste previously disposed of at this property. In 1992, 2011, and 2015, methane gas surveys were completed at the former landfill and no methane gas was detected. Based on this information and direction of groundwater flow, this former landfill is not considered an environmental concern to the site.

Contaminated Groundwater

The Phase I ESA noted that mapping of contaminated groundwater plumes associated with releases of hazardous substances at the Montrose Super Fund site and the nearby Del Amo Superfund site, indicates there is a portion of that contamination plume beneath the southwestern portion of the project site. Contaminants in this groundwater include chlorobenzene, VOCs, pesticides, polynuclear aromatics and

metals. Laboratory testing of soils samples and soil vapor samples collected at the project site found no detectable concentrations of chlorobenzene. Research conducted for the Phase I ESA determined that depth to the groundwater has been reported at more than 65 feet below ground surface. The proposed grading plan includes excavations generally less than 10 feet deep in the southwestern part of the site, with deeper excavations for building footings reaching to 15 feet deep. Project grading, therefore, would not penetrate or be near the contaminated groundwater plume. The project would not exacerbate the existing groundwater contamination problem during or following construction.

Mitigation Measure 9-1: Prior to issuance of any demolition permit, the project applicant shall retain a licensed asbestos abatement consultant to conduct a survey of the five existing buildings on-site to determine the presence or absence of asbestos containing materials (ACM). If required, the applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to the LACDPW and the Los Angeles County Fire Department (LACoFD) for review and approval. A licensed asbestos abatement contractor shall perform the abatement or removal of any ACMs found onsite, in compliance with all applicable federal, state, and local laws and regulations, including SCAQMD Rule 1403. Copies of all licenses and certifications for the asbestos consultant and contractors shall be provided to LACDPW and LACoFD prior to the commencement of any surveys or abatements.

Mitigation Measure 9-2: Prior to the issuance of a demolition permit the project developer shall submit a completed survey of the five buildings remaining on-site to determine the presence or absence of lead-based paint. If found, procedures to properly remove and dispose of those contaminants shall be implemented during building demolition in accordance with the California Health and Safety Code Section 10520. If required, the applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan for review and approval by the Los Angeles County LACDPW and the LACoFD. Copies of all licenses and certifications for the lead-based paint abatement consultants contractor shall be provided to LACDPW and LACoFD prior to the commencement of any surveys or abatement.

Mitigation Measure 9-3: All activities that would disturb the soil on the project site, including but not limited to excavation, grading, removal, trenching, filling, earth movement, mining, or drilling, shall comply with the approved SMP dated April 2019 and attached to this document as Appendix I.

Mitigation Measure 9-4: The project developer shall record the land use covenant required under the USEPA Settlement Agreement on the subject property land title, to prohibit any noncommercial/nonindustrial use of the subject property. Prior to issuance of a grading permit for the proposed warehouse, a copy of this recorded covenant shall be provided to the County Department of Regional Planning.

- c) ***Less Than Significant with Mitigation Incorporated.*** Sensitive land uses within 1/4 mile of the project site include single-family residences to the north, east and west, and a few rental units directly opposite the site, on the north side of Torrance Boulevard, west of Kenwood Street. There are no other sensitive land uses in this radius. Based on data developed by the USEPA Environmental Justice Screening and Mapping tool, USEPA considers the community that lives near the Montrose Superfund site to be vulnerable.³⁵ This community is exposed to multiple environmental burdens, including industrial facilities, poor air quality and heavy street traffic. The U.S. Census information indicates this area is comprised of a predominately minority and elderly population that has an elevated level of linguistic isolation.

³⁵ U.S. Environmental Protection Agency, Region IX, Administrative Settlement Agreement and Order on Consent for Removal Actions (CERCLA Docket No. 2018-07), in the Matter of Ecology Control Industries, Inc Removal Site, Los Angeles, California and Bridge Point South Bay II, LLC, Purchaser.

The proposed project is intended for occupancy by businesses engaged in, warehousing and distribution of materials and partially or fully finished products to off-site customers. All activities, except for trucking deliveries and off-site transport, and use of equipment such as forklifts, would be conducted within the building interior. No industrial processes that would generate atmospheric emissions or other forms of hazardous substances or wastes would be allowed under the proposed CUP. As such, there would be no impacts to nearby sensitive land uses from such potential sources of hazardous substances, emissions or wastes. As discussed in the response to Checklist topic 3d) in the Air Quality section of this Initial Study, a quantitative Health Risk Assessment prepared in accordance with current recommendations of the SCAQMD, determined that the regular operations of the proposed warehouse facility would not generate significant levels of diesel particulate matter (a toxic air contaminant) from forklifts, trucks or other mobile equipment. The quantitative air dispersion modeling of those emissions determined that the project's daily activities would not result in significant cancer or non-cancer health hazard risks at the nearby sensitive land uses. Nonetheless, Mitigation Measure 3-2 will be imposed to require tenants and any future owners to use forklifts and other off-road mobile equipment such as parking lot sweepers to use only models powered by clean fuels or batteries to eliminate diesel emissions from those sources.

As discussed in the preceding response, potential impacts that might occur during the project's demolition and construction phases due to disturbance of contaminated soils on-site, or during removal of the existing buildings which might contain hazardous materials, will be reduced to less than significant through implementation of Mitigation Measures 9-1 through 9-4.

- d) ***Less Than Significant with Mitigation Incorporated.*** An environmental information database search was performed by EDR in conjunction with the Phase I ESA on December 26, 2017. The review evaluated whether the site or properties within the site vicinity have been reported as having experienced significant unauthorized releases of hazardous substances or other events with potential adverse environmental effects. The database search included federal, state, local, and tribal databases. A description of the databases searched, their corresponding search radii, and the number of noted facilities of environmental concern are found in the Phase I ESA in Appendix F of this Initial Study. Table 9-3 contains a summary of the findings of the environmental database search results.

Table 9-3 – Environmental Database Search Results for Project Site

Database	Environmental Concern	Summary of Findings
Federal Comprehensive, Environmental Response, Compensation, and Liability Information System (CERCLIS) ¹	Groundwater contamination	The project site is listed on the SEMS – Archive database as Akzo Coatings Inc., a former liquid coatings business that closed in the 1990s. Two UST farms associated with that past business were investigated for potential releases of VOCs. No significant concentrations were found during testing; the LARWQCB issued a no further action determination in 1996 and the case was closed. Testing for soil vapor conducted in 2014 found no concentrations that exceeded state or initial federal screening levels.
Federal RCRA	Hazardous waste	The site is listed as a small-quantity generator of hazardous waste, as ECI. No violations were reported.
State Calsites Database (Calsites) or State-Equivalent CERCLIS	DDT-impacted soils along eastern part of site	ECI is listed in relation to the DDT-impacted soils formerly stockpiled in the eastern portion of the site. Investigations by USEPA in 2010 determined that trace levels in the subsurface soils were within USEPA's acceptable risk management range for occupational workers and construction workers. A

Database	Environmental Concern	Summary of Findings
		HHRA prepared by Ardent confirmed these findings and concluded the soils could remain in place without a significant threat to the environment or human health. Nonetheless, an SMP will be implemented, as described in Mitigation Measure 9-3, to ensure the safety of site workers and to limit the emissions of dust during grading activities.
State Leaking Underground Storage Tank (LUST)	Leaking Underground Storage Tanks	Closed LUST case associated with the former Akzo Coatings, Inc.
State Aboveground and Underground Storage Tank (AST and UST)	Chemical or fuel storage tanks	Inclusion on this list is for permitting purposes and is not indicative of a release.
State Voluntary Cleanup Programs (VCP)	Project site	ECI formally entered into a VCP with the DTSC for the DDT-impacted soils. The case has been transferred to the USEPA for oversight. Proposed Mitigation Measures 9-1, 9-2, 9-3, and 9-4 are intended to achieve compliance with USEPA requirements and the terms included in the USEPA Settlement Agreement.

Notes:

¹The CERCLIS database has been replaced by the Superfund Enterprise Management System (SEMS) database, which includes properties listed on the SEMS – ARCHIVE database and facilities with No Further Remedial Action Planned (NFRAP).

Although the project site appears on several lists, the remaining level of environmental hazard due to past site contamination that could be exacerbated by project construction is considered low and, with Mitigation Measures 9-1 through 9-4, the project impact would be less than significant.

- e) **No Impact.** The nearest public airport is Zamperini Field, which is a municipal airport located approximately 6 miles southeast of the project site. Since the project is not in an airport land use plan or within two miles of a public or public use airport, there would be no impact in relation to this issue.
- f) **No Impact.** The nearest private air strip is the Goodyear Blimp Base Airport, located 1.5 miles northeast of the project site, in the City of Gardena. Approach and departure paths that are involved in potential airport hazards zones are not near the project site. The proposed project includes warehouse activities that would primarily occur within the interior of the onsite structure. While some loading and unloading of materials will occur in the exterior, these types of activities are common and do not involve equipment or any types of controls, signage, or lighting that would interfere with air traffic or private airstrip activities. The proposed warehouse structure would reach a maximum height of approximately 55 feet, well below any air traffic space; thus, the project would not intrude into or be affected by any air traffic space associated with that private facility and there would be no impact in relation to this issue.
- g) **Less Than Significant Impact.** Los Angeles County Office of Emergency Management (OEM) is responsible for emergency response planning and maintaining the Los Angeles County Operational Area Emergency Response Plan (OAERP). The OAERP also issued the County of Los Angeles All-Hazard Mitigation Plan, which was adopted by the County Board of Supervisors in 2014. This plan includes a vulnerability analysis for many types of hazards, such as earthquakes, floods, fires, and man-made hazards; objectives for strategies for mitigating hazards; proposed strategies and actions for reducing vulnerability to identified hazards; and lists of facilities and equipment available for responding to disasters. The OAERP incorporates and complies with the principles and requirements found in federal and state laws, regulations, and guidelines. The OAERP is compliant with the

National Incident Management System, the National Response Framework, and the State Emergency Management System.

The LACoFD is the local agency responsible for implementing State Emergency Management System development and planning in case of a disaster. The Los Angeles County Sheriff's Department devises evacuation routes based on the specific circumstance of the emergency.

The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. To ensure compliance with zoning, building and fire codes, the applicant is required to submit appropriate plans for plan review prior to the issuance of a building permit. Adherence to these requirements ensures that the project will not conflict with emergency response and evacuation plans. Project impacts to emergency response or evacuation would be less than significant.

- h)i. No Impact.* According to the Cal Fire Fire Hazard Severity Maps, the project site is not located within a high fire hazard severity zone.³⁶ Therefore, there would be no impact in relation to this issue.
- h)ii. No Impact.* As noted in the preceding response to 9h)i., the project site is not located within a high fire hazard severity zone. There is sufficient access for emergency response vehicles, including fire engines and crews. Therefore, there would be no impact in relation to this issue.
- h)iii. Less Than Significant Impact.* The LACoFD has indicated that the required fire flow for the public and private on-site fire hydrants for this project is 4,000 gallons per minute (gpm) at 20 pounds per inch (psi) residual pressure for 4 hours. Three public fire hydrants flowing simultaneously may be used to achieve the required fire flow.

This site is located within the jurisdictional boundaries of California Water Service, which maintains an existing 6-inch water main located in Torrance Boulevard and an existing 10- to 12-inch water main in Normandie Avenue. A dual fire flow test was conducted by California Water Service in May 2017 from the water main in Normandie Avenue near the southwest corner of the site, which indicated adequate flow availability in accordance with the required fire flow of 4,000 gpm at 20 psi residual pressure for 4 hours. Evidence of sufficient water flow at the site's fire hydrants will be provided to the LACoFD, prior to issuance of certificate of building occupancy, in accordance with standard procedures. The proposed site plan includes the recommended fire hydrant locations specified by the LACoFD. The project would have a less-than-significant-impact regarding water pressure and adequacy of fire flows.

- h)iv. Less Than Significant Impact.* Land uses within the project vicinity are a mixture of warehouses, multi-tenant light industrial, restaurant, tire sales, and single- and multi-family residential sites. None of the nearest surrounding residential or commercial land uses include activities that are considered a uniquely dangerous fire hazard, since none of these land uses engage in activities that involve large quantities of flammable materials. Other large warehouse facilities are also located in the vicinity, northwest of the intersection of Normandie Avenue and Torrance Boulevard, but these are not considered to represent a danger of a high fire hazard, since they are comprised of modern concrete buildings where all work occurs indoor and at loading docks. The adjacent multi-tenant industrial complex to the south of the site is comprised of concrete structures and has no fueling areas or any outside business activities, except for vehicle parking. There is no exterior indication of any activities that would involve substantial use of flammable materials outside of any building.

As with any project, there is the threat of fire from nearby land uses; however, this project site is not located in an area that has an abnormally high potential to be exposed to threats from fire. The project site and

³⁶ http://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles CAL FIRE Very High Fire Hazard Severity Zones in LRA - Los Angeles (c19fhszl06_5), accessed February 9, 2018.

surrounding areas are served by both the LACoFD and the City of Los Angeles Fire Department. It is presumed that other businesses and residential development in the area were built to conform to the regulations and standards set forth by the responsible fire department in regard to access, water mains, fire hydrants and flow, and building materials. The proposed project would have no effect on the physical composition or nature of typical activities of any surrounding land uses. Thus, impacts in relation to this issue are less than significant.

- i) ***Less Than Significant Impact.*** Future building tenants would be engaged in warehousing, and/or distribution of finished or partially finished goods and materials. While no specific tenants have been identified at this time, the proposed site improvements are intended to attract businesses that engage in logistics activities involving storage, possibly some assembly and packaging, and trucked distribution of goods to various types of customers in this region. No fuel storage or dispensing facilities are proposed. No industrial processes or manufacturing activities are proposed for the warehousing uses; therefore, the project would have a less-than-significant impact involving fire hazards from proposed daily business activities.

As a concrete tilt-up structure, the proposed building would not be made of flammable materials. Site access and internal circulation and location of fire hydrants has been designed to conform to the standards specified by the LACoFD. Final site and building plans are subject to the review and approval of the LACoFD prior to the issuance of building permits. The project is required to comply with the California Code of Regulations, Fire Code (Title 24, Part 9), which establishes minimum fire safety requirements for new and existing buildings, facilities, storage and processes, and addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes. Thus, required adherence to all local, state, and federal fire safety regulations reduces potential operational fire hazard impacts to less than significant.

References:

Ardent, 2017. Phase I Environmental Site Assessment, 20802-20850 Normandie Avenue, Los Angeles, California.

_____, 2018. Data Evaluation and Human Health Risk Assessment, 20846 South Normandie Avenue, Los Angeles, CA.

United States Environmental Protection Agency, Region IX, 2018. Administrative Settlement Agreement and Order on Consent for Removal Actions, In the Matter of Ecology Control Industries, Inc. Removal Site, Los Angeles, California and Bridge Point South Bay II, LLC, Purchaser. Proceeding Under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§9601-9675.

Thienes Engineering, 2018a. Approximate Bottom of Over Excavation Exhibit for Bridge Point South Bay II, 20850 Normandie Avenue, Los Angeles, California.

_____. 2018b. Stormwater Pollution Prevention Plan for Bridge Point South Bay II, APN: 7348-020-003, 004, 007, 008, 009, 010.

10. HYDROLOGY AND WATER QUALITY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Add water features or create conditions in which standing water can accumulate that could increase habitat for mosquitoes and other vectors that transmit diseases such as the West Nile virus and result in increased pesticide use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Generate construction or post-construction runoff that would violate applicable stormwater NPDES permits or otherwise significantly affect surface water or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in point or nonpoint source pollutant discharges into State Water Resources Control Board-designated Areas of Special Biological Significance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
j) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
l) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or within a floodway or floodplain?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m) Place structures, which would impede or redirect flood flows, within a 100-year flood hazard area, floodway, or floodplain?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
o) Place structures in areas subject to inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) ***Less Than Significant Impact.*** Los Angeles County is split between two water quality regions: the Los Angeles Region and the Lahontan Region. Each Regional Water Quality Control Board (LARWQCB) prepares and maintains a basin plan which identifies narrative and numerical water quality objectives to protect all beneficial uses of the waters of that region. The basin plans strive to achieve the identified water quality objectives through implementation of Waste Discharge Requirements (WDRs) and by employing three strategies for addressing water quality issues: control of point source pollutants, control of nonpoint source pollutants, and remediation of existing contamination. The project site is located in the Los Angeles Region and is, therefore, covered under the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan).

Point sources of pollutants are well-defined locations at which pollutants flow into water bodies (discharges from wastewater treatment plants and industrial sources, for example). These sources are controlled through regulatory systems including permitting under California's WDRs and the National Pollutant Discharge Elimination System (NPDES) program; permits are issued by the appropriate RWQCB and may set discharge limitation or other discharge provisions.

According to the Basin Plan, nonpoint sources of pollutants are typically derived from project site runoff caused by rain or irrigation and have been classified by the USEPA into one of the following categories: agriculture, urban runoff, construction, hydromodification, resource extraction, silviculture, and land disposal. This type of pollution is not ideally suited to be addressed by the same regulatory mechanisms used to control point sources. Instead, California's Nonpoint Source Management Plan describes a three-tiered approach, including the voluntary use of BMPs, the regulatory enforcement of the use of BMPs,

and effluent limitations. Generally speaking, each RWQCB implements the least restrictive tier until more stringent enforcement is necessary.

The LARWQCB addresses on-site drainage through its construction, industrial, and municipal permit programs. These permits require measures to minimize or prevent erosion and reduce the volume of sediments and pollutants in a project's runoff and discharges based upon the size of the project site.

During the construction phase of a proposed project, the pollutants of greatest concern are sediment, which may run off the project site due to site grading or other site preparation activities, and hydrocarbon or fossil fuel remnants from the construction equipment. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in surface runoff. Accordingly, project construction activities could have the potential to result in adverse effects on water quality. However, construction runoff is regulated by the NPDES Construction General Permit, which requires identification of a variety of water quality control BMPs to be specified on construction plans and implemented throughout construction. Measures are required to keep stormwater out of construction zones, to conduct regular site maintenance and "good housekeeping practices" to prevent and minimize and dispose of solid and liquid wastes, to capture and control any site runoff so that water pollutants don't enter storm drains, and to have response procedures in place in the event of accidental spills of water contaminants. This permit applies to all construction which disturbs an area of at least one acre and is administered by the RWQCB. Please refer to the response to threshold 9(a), in the Hazards section of this Initial Study, for further details on the specific BMPs to prevent stormwater pollution that are contained in the project's proposed SWPPP. A copy of the preliminary SWPPP is provided in Appendix K of this Initial Study. Through this existing, mandatory regulatory compliance measure, potential water quality impacts during construction would be avoided or reduced to less than significant levels and would avoid conflicts with water quality standards established by the RWQCB.

In addition, the project is categorized by the County's Low Impact Development (LID) Ordinance as a Designated Project, which is defined as a significant redevelopment where 50 percent or more of the impervious surface of a previously developed site is proposed to be altered and the previous development was not subject to post-construction stormwater quality control measures.³⁷ As a result, the project would be required to prohibit the discharge of pollutants from the project site and to meet the requirements of the County's LID Standards Manual, including the installation and maintenance of post-construction treatment controls and BMPs. Some of the structural BMPs to be implemented by the project would include, but not be limited to, the following:³⁸

- Install drain inserts and filtration systems to disconnect runoff from impervious areas and use inlets to intercept "low flows" toward the filtration devices for treatment prior to discharging off-site;
- Increase the quantity of vegetation currently on-site;
- Stencil and mark all proposed and existing inlets to remain with prohibitive language and/or graphical icons to prevent dumping;
- Locate trash enclosures away from roof drains;
- Sweep parking lots on a monthly basis, at a minimum, and before rain events; and

³⁷ Thienes Engineering, Preliminary Hydrology Calculations for Southeast Corner of Torrance Blvd. and Normandie Ave. Los Angeles County, California, March 27, 2019.

³⁸ Thienes Engineering, Low Impact Development (LID) for Bridge Development, Southeast Corner of Torrance Avenue and Normandie Avenue, County of Los Angeles, CA 90502, April 4, 2019.

- Use absorbent materials to collect any spilled oil and properly dispose to avoid stormwater contamination.

The Los Angeles County LID Ordinance is designed to promote sustainability and improve the County's watersheds by preserving drainage paths and natural water supplies in order to "retain, detain, store, change the timing of, or filter stormwater or runoff." Consistent with the provisions of the County's LID Ordinance, all Designated Projects must control runoff through infiltration, bioretention, biofiltration, and/or rainfall harvest and use. However, an infiltration testing was performed at the project site. Test results indicated that on-site soils have very low infiltration rates and are generally not considered suitable for infiltration.³⁹ In addition, based on the Phase I Environmental Site Assessment prepared for the project, the project site is located above groundwater that has been impacted by the Montrose Chemical Corporation and Del Amo Superfund sites. Consequently, infiltration is not recommended. Instead, the project would treat stormwater runoff through the use of a stormwater bioretention filtration system, which is designed to treat rainfall intensity better than conventional biofiltration.⁴⁰ The system would be installed in a small landscaped area near the northeastern corner of the proposed building and in the landscaping along the site perimeter near the southeastern corner of the project site.

The filtration system is a fully equipped, preconstructed drop-in-place unit that is designed for applications in the urban landscape to treat contaminated runoff. It utilizes physical, chemical, and biological mechanisms of a soil, plant, and microbe complex to remove pollutants typically found in urban stormwater runoff, such as total suspended solids, phosphorus, nitrogen, bacteria, heavy metals, and hydrocarbons.⁴¹ Stormwater runoff enters the unit through an inlet, spreading over a 3-inch layer of mulch on the surface of the filter media. As the stormwater passes through the mulch layer, most of the larger sediment particles and heavy metals are removed through sedimentation and chemical reaction with the organic material in the mulch. Water then passes through the soil media, where the finer particles are removed, and other chemical reactions take place to immobilize and capture pollutants in the soil media. The cleansed water then passes into an underdrain and flows to a pipe system or other appropriate discharge point. Once the pollutants are in the soil, the bacteria begin to break down and metabolize the materials and the plants begin to uptake and metabolize the pollutants. Some pollutants, such as heavy metals that are chemically bound to organic particles in the mulch, are released over time as the organic matter decomposes to release the metals to the feeder roots of the plants and the cells of the bacteria in the soil, where they remain and are recycled. Other pollutants, such as phosphorus, are chemically bound to the soil particles and released slowly back to the plants and bacteria and used in their metabolic processes. Nitrogen goes through a complex variety of biochemical processes, where it can ultimately end up in the plant/bacteria biomass, turned to nitrogen gas, or dissolved back into the water column as nitrates, depending on soil temperature, pH, and the availability of oxygen. Most of the pollutants are retained in the mulch, soil, and biomass with a very small quantity released into the air or back into the water.⁴²

Therefore, with conformance to the County's LID requirements and incorporation of required construction and post-construction BMPs, no impacts related to the violation of any water quality standards or waste discharge requirements would occur and impacts would be less than significant.

³⁹ Southern California Geotechnical, Results of Infiltration Testing for the Proposed Commercial/Industrial Building, 20846 South Normandie Avenue, Los Angeles County, California, for Bridge Development Partners, June 9, 2017.

⁴⁰ Thienes Engineering, Preliminary Hydrology Calculations for Southeast Corner of Torrance Blvd. and Normandie Ave. Los Angeles County, California, March 27, 2019.

⁴¹ Thienes Engineering, Low Impact Development (LID) for Bridge Development, Southeast Corner of Torrance Avenue and Normandie Avenue, County of Los Angeles, CA 90502, April 4, 2019.

⁴² *Ibid.*

- b) ***Less Than Significant Impact.*** According to the geotechnical investigation conducted for the project, soil borings were drilled to a maximum depth of 50 feet, in which no groundwater was encountered.⁴³ Proposed grading would include excavation and removal of unsuitable fill materials, extending 3 to approximately 17 feet deep across the project site, and additional over excavations of 3 to 4 feet below proposed building pad grades. Therefore, it is not anticipated that project construction would require dewatering or other withdrawals of groundwater. There are no groundwater wells on the project site and none are proposed. The project would rely totally on a piped-in water supply from Southern California Water Company, and there would be no reliance on any existing or new groundwater extraction wells. Accordingly, project construction would not deplete groundwater supplies or interfere with groundwater recharge.

Similarly, operation of the project would not interfere with groundwater recharge. The project site is located in an urbanized area and is currently developed with five small buildings surrounded by impervious surfaces that cover a large majority of the site. The project would replace these existing improvements with a 203,877-square-foot concrete warehouse/office building with extensive adjacent impervious pavement and landscaping limited to the site perimeter for added visual screening from the surrounding uses. As such, the project would not substantially change the amount of impervious surface area on-site to affect groundwater levels beneath the project site. Therefore, the project would not deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts to groundwater would be less than significant.

- c,d) ***Less Than Significant Impact.*** The project site is not traversed by any water courses or rivers; the Dominguez Channel is approximately two miles east and the Los Angeles River is over five miles east of the project site. According to the Preliminary Hydrology Calculations Report prepared for the project, the project site currently generally drains easterly to a 36-inch corrugated metal pipe riser tributary to Project No. 685, which is a County-maintained drainage facility, via an 18-inch storm drain lateral.⁴⁴ The project proposes to drain to catch basins located in the truck yard on the southern portion of the project site and in the parking lot on the northern portion of the project site, which would convey runoff easterly to Project No. 685 via the existing 18-inch storm drain lateral, similar to existing conditions.⁴⁵ Therefore, although the project would alter the existing drainage pattern within the site, no changes to stormwater runoff off-site would occur as a result of project implementation. As such, the project would not alter the existing drainage pattern beyond the project site to alter the course of a stream or river in a manner that would result in erosion, siltation, or flooding on- or off-site, and impacts related to erosion, siltation, or flooding would be less than significant.

- e) ***Less than Significant.*** The project does not propose any water features. As detailed in sections 10 c,d), the proposed project would alter drainage patterns of the existing site through grading and by locating catch basins in the truck yard on the southern portion of the project site, as well as in the parking lot on the northern portion of the project site. These proposed catch basins would temporarily detain water on-site to reduce the stormwater discharge flow rate to the allowable peak flow rate of 9.8 cubic feet per second (cfs). The stormwater basin's design is expected to sufficiently capture the project site's stormwater before any ponding can occur that could create habitat for mosquitoes and other vectors that transmit diseases and result in increased pesticide use. Therefore, project implementation would have a less-than-significant impact related to alterations of existing drainage patterns that could potentially increase habitat for mosquitos and other disease transmitting vectors.

⁴³ Southern California Geotechnical, Geotechnical Investigation for the Proposed Commercial/Industrial Building, 20846 South Normandie Avenue, Los Angeles County, California, for Bridge Development Partners, June 9, 2017.

⁴⁴ Thienes Engineering, Preliminary Hydrology Calculations for Southeast Corner of Torrance Blvd. and Normandie Ave. Los Angeles County, California, March 27, 2019.

⁴⁵ *Ibid.*

- f) ***Less Than Significant Impact.*** According to Los Angeles County hydrology data, the project site drains to the County-maintained Project No. 685, an 8-foot-wide by 12.5-foot-high reinforced concrete box that traverses the project site near the easterly property line. Allowable 50-year peak flow discharge into Project No. 685 is 1.1 cfs per acre; since the project site comprises 8.98 acres, the allowable peak flow rate from the project site is 9.8 cfs. The northern half of the proposed building and the parking lots on the northern and eastern portions of the site would drain to catch basins in the parking lot on the northern portion of the project site. The 50-year peak flow rate from the northern portion of the project site would be approximately 10.4 cfs. The southern half of the proposed building, the truck yard, and the parking lots on the southwestern portion of the project site would drain to catch basins in the truck yard. The 50-year peak flow rate from this portion of the site would be approximately 13.3 cfs. The southern corner of the proposed building and the parking lot on the southeastern portion of the project site would drain approximately 2.7 cfs directly to a proposed storm drain. In addition, the proposed landscaped area along Torrance Boulevard and Normandie Avenue would surface drain approximately 0.7 cfs via the streets to an existing street catch basin near the northeastern corner of the project site. Runoff to all catch basins and storm drains would be conveyed to Project Site No. 685. In total, the 50-year flow rate from the entire project site at project buildout would be approximately 27.1 cfs.⁴⁶

Without detention, the total runoff discharged from the proposed on-site storm drain system would exceed the volume that can be accepted by Project No. 685. Detention of stormwater runoff would be implemented in the parking lots on the northern portion of the project site and the truck yard in the southern portion of the project site to reduce the 50-year flow rate resulting from the project to the allowable discharge rate. Stormwater runoff to the northern portion of the project site would be temporarily detained at a depth of 0.60 foot with 4.7 cfs discharging to Project No. 685. Similarly, stormwater runoff to the truck yard would be temporarily detained at a depth of 0.68 foot with 1.7 cfs discharging to Project No. 685. Stormwater runoff from the southeastern portion of the project site and landscaped areas would be discharged undetained. With on-site detention, the proposed 50-year flow rate resulting from the project to Project No. 685 would be limited to the allowable discharge of 9.8 cfs.⁴⁷

In addition, as discussed in response 10(a) above, the project would treat stormwater runoff through the use of Filterra systems, which is designed to treat rainfall intensity better than conventional biofiltration.

Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and, as such, would result in a less-than-significant impact.

- g) ***Less Than Significant Impact.*** Please refer to the discussion of compliance with existing NPDES and other water quality regulations provided in the response to issue 10(a) above.
- h) ***Less Than Significant Impact.*** As a Designated Project, the proposed development would be required to comply with the LID Ordinance. Thienes Engineering prepared a plan to comply with the ordinance standards in October 2017 (see Appendix K of this Initial Study), which has been submitted to LACDPW for review and approval. As noted in the earlier response to a) in this section, the main water quality mechanism proposed is a bioretention stormwater filtration system that will collect and pre-treat site runoff before it is discharged into the municipal stormwater system. All elements of the proposed storm drainage plan are designed to comply with the County's LID standards. Therefore, no conflicts with the County's LID Ordinance would occur and impacts from site runoff would be less than significant.

⁴⁶ *Ibid.*

⁴⁷ *Ibid.*

- i) **No Impact.** Areas of Special Biological Significance are “those areas designated by the State Water Board as ocean areas requiring protection of species or biological communities to the extent that alteration of natural water quality is undesirable. All Areas of Special Biological Significance are also classified as a subset of STATE WATER QUALITY PROTECTION AREAS.” There are no designated Areas of Special Biological Significance within 30 miles of the project site since all of these areas are located off the coast of California and not within any inland water courses or bodies.⁴⁸ In addition, any runoff from the project site would be discharged into a public storm drain system. Furthermore, the project would be required to comply with the County’s LID Ordinance, which would prevent discharge of substantial amounts of nonpoint sources of pollutants. Therefore, no impacts related to pollutant discharges into Areas of Special Biological Significance would occur as a result of project implementation.
- j) **No Impact.** The project does not propose any wastewater treatment system on-site as the proposed development would connect to existing public water and sewer systems. Therefore, no impacts related to the use of on-site wastewater treatment systems would occur as a result of project implementation.
- k) **Less Than Significant Impact.** Please refer to response 10(a) above, which covers all of the project’s potential impacts to water quality.
- l-m) **No Impact.** The Federal Emergency Management Agency (FEMA) prepares hydrological studies throughout the country, called Flood Insurance Studies, in order to identify areas that are prone to flooding. From the results of these studies, FEMA prepares Flood Insurance Rate Maps (FIRMs) that are designed to geographically depict the location of areas prone to flooding for purposes of determining risk assessment for flood insurance. An area that has been designated a 100-year flood plain is considered likely to flood under the 100-year storm event. According to the FIRM for the project area and the County’s Flood Zone Determination website, the project site not located within a designated 100-year flood plain.⁴⁹ Therefore, no impact related to the placement of structures within a 100-year flood hazard area, floodway, or floodplain would occur as a result of project implementation.
- n) **Less Than Significant Impact.** According to the Dam Map of Los Angeles County, the closest reservoirs to the project site are the Walteria and Palos Verdes Reservoirs, located at higher elevations, approximately four miles southwest of the project site.⁵⁰ The Palos Verdes Reservoir is regulated and subject to regular evaluation by the California Division of Dam Safety, which has certified this facility and classifies it as Satisfactory. The Walteria Reservoir is owned and operated by the City of Torrance. The City’s Local Hazard Mitigation Plan indicates that in the event of a catastrophic failure of this reservoir, the total inundation area would be approximately 215 acres, almost entirely within the city limits. Given the distance between these two reservoirs and the project site, the regular evaluation and maintenance provided for both and the many intervening buildings and structures that would likely divert any water releases long before reaching the project site, the threat of dam inundation is considered to be less than significant. The proposed project would have no effect on conditions at either reservoir that could affect the possibility of a structural failure.
- o) **No Impact.** A seiche is the sudden oscillation of water that occurs in an enclosed, landlocked body of water due to wind, earthquake, or other factors. As identified in response 10(n) above, there are no reservoirs or other bodies of water near the project site; therefore, the project would not place structures

⁴⁸ State Water Resources Control Board, California’s Areas of Special Biological Significance Website, https://www.waterboards.ca.gov/water_issues/programs/ocean/asbs_map.shtml, access on March 9, 2018.

⁴⁹ FEMA FIRM Panel No. 06037C1935F; Los Angeles County Department of Public Works, Flood Zone Determination Website, <http://dpw.lacounty.gov/floodzone/>, accessed on March 12, 2018.

⁵⁰ Dam Map of Los Angeles County, California, <http://www.us-places.com/mapper.php?page=map+of+Dams+in+Los+Angeles+County%2C+California&fips=06037&fc=Dam>, accessed on March 9, 2017.

in areas subject to inundation by seiche. A tsunami is an unusually large wave or set of waves that is triggered in most cases by a seaquake or an underwater volcanic eruption. The project site is located more than 5 miles east of the Pacific Ocean; given this distance, the project would not place structures in areas subject to inundation by tsunami. A mudflow is flow consisting predominantly of earthen materials/soil and water generated by heavy rainstorms in canyons and other drainage courses. The project site is in a generally flat terrain; the site topography slopes downward to the east at a gradient of less than two percent.⁵¹ Accordingly, the project would not place structures in areas subject to inundation by mudflow. Therefore, no impact related to inundation by seiche, tsunami, or mudflow would occur as a result of project implementation.

References:

- California, State of, Natural Resources Agency, Department of Water Resources, Division of Safety of Dams. 2017. *Dams Within Jurisdiction of the State of California*. <https://www.water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/All-Programs/Division-of-safety-of-dams/Files/Publications/Dams-Within-Jurisdiction-of-the-State-of-California-Alphabetically-by-County.pdf>.
- City of Torrance. 2016. *Draft Local Hazard Mitigation Plan*.
- Federal Emergency Management Administration. FIRM Panel No. 06037C1935F.
- Los Angeles County. 2018. Department of Public Works, Flood Zone Determination Website. Accessed on March 12, 2018. <http://dpw.lacounty.gov/floodzone>.
- Southern California Geotechnical. 2017a. Geotechnical Investigation for the Proposed Commercial/Industrial Building, 20846 South Normandie Avenue, Los Angeles County, California, for Bridge Development Partners.
- . 2017n. Results of Infiltration Testing for the Proposed Commercial/Industrial Building, 20846 South Normandie Avenue, Los Angeles County, California, for Bridge Development Partners.
- State Water Resources Control Board. 2017. California's Areas of Special Biological Significance Website. Accessed on March 9, 2018. https://www.waterboards.ca.gov/water_issues/programs/ocean/asbs_map.shtml.
- Thienes Engineering. 2019a. Low Impact Development (LID) for Bridge Development, Southeast Corner of Torrance Avenue and Normandie Avenue, County of Los Angeles, CA 90502.
- . 2019b. Preliminary Hydrology Calculations for Southeast Corner of Torrance Blvd. and Normandie Ave. Los Angeles County, California.
- . 2019c. Stormwater Pollution Prevention Plan for Bridge Point South Bay II, APN: 7348-020-003, 004, 007, 008, 009, 010
- US-Places.com. n.d. Dam Map of Los Angeles County, California. Accessed on March 9, 2018. <http://www.us-places.com/mapper.php?page=map+of+Dams+in+Los+Angeles+County%2C+California&fips=06037&fc=Dam>.

⁵¹ Southern California Geotechnical, Geotechnical Investigation for the Proposed Commercial/Industrial Building, 20846 South Normandie Avenue, Los Angeles County, California, for Bridge Development Partners, June 9, 2017.

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Be inconsistent with the applicable County plans for the subject property including, but not limited to, the General Plan, specific plans, local coastal plans, area plans, and community/neighborhood plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be inconsistent with the County zoning ordinance as applicable to the subject property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) ***Less Than Significant.*** The previously developed project site is located in a fully urbanized area, at the intersection of two major streets, where all types of urban infrastructure are readily available. Surrounding land in all directions is fully developed with a mixture of industrial, commercial, and residential land uses. There is undeveloped land along the southeastern edge of the site, owned by the LACFCD, which is not slated for development, and residential uses to the west, north, and east. Vehicular access to/from the project site would be from driveways located on the Normandie Avenue and Torrance Boulevard frontages, in the same locations where driveways currently exist. All wet and dry utilities needed to meet the project needs are available from nearby facilities in the adjacent street segments. The project site has been developed with a variety of commercial and industrial land uses since approximately 1940. All proposed project improvements would occur within the boundaries of the project site, except for short utility connections in adjacent street segments. New landscaping elements and a 10-foot-high concrete wall would be provided along the eastern boundary to create a visual and noise barrier for the homes immediately to the east. Outdoor lighting for security and night visibility would be comprised of highly energy efficient LED fixtures and designed to confine illumination within the project site, with minimal lighting at the perimeter and no light intrusion outside the project site. New landscaping would be installed along both street frontages and the warehouse structure would be articulated with a variety of architectural features to enhance the visual character of the developed site. All truck movements would be restricted to the Normandie Avenue driveway, to minimize potential impacts from vehicular movements along the eastern drive aisle for vehicles entering/exiting from Torrance Boulevard.

Therefore, the proposed development itself would not serve to physically divide an existing, established community. Further, development of the proposed project would not require construction of any new major infrastructure elements that would cut through neighboring properties or otherwise require physical alterations to the existing urban landscape off-site. As such, the established physical character of this area would be maintained and there would be a less-than-significant impact.

- b) **No Impact.** Policies governing the location, type, and intensity of land uses in the unincorporated territory of Los Angeles County are set forth in Chapter 6: Land Use Element of the Los Angeles County 2035 General Plan, which was adopted by the County Board of Supervisors on October 6, 2015. The subject site is designated IL in the Land Use Element; this land use category is intended for development of a range of light industrial uses, including light manufacturing, assembly, warehousing and distribution. The land use policy map for the West Carson-Rancho Dominguez area also designates the project site as Light Industrial (IL). In lands with this designation, the floor area ratio is limited to a maximum of 1.0, which means up to one square foot of building floor area for each square foot of site area. The proposed warehouse/distribution facility project is consistent with this land use designation, with respect to proposed uses, and with a proposed floor area ratio of 0.52, the project land use intensity is well below the maximum established in the Land Use Element. There are no other local or area plans governing land use in this area.
- c) **No Impact.** The subject property is zoned Manufacturing Industrial Planned Development (MPD), as established by the County's Code. Zone MPD allows uses permitted in Zone M-1.5 (Restricted Heavy Manufacturing Zone), which include warehousing and distribution facilities, subject to a discretionary process, requiring a CUP.
- The proposed facility could be leased to future warehouse/distribution businesses, pursuant to the proposed CUP. Approximately 10,000 square feet of the building area would be structured as ancillary office space to serve the primary businesses only. The project would comply with all applicable Zone MPD building and development standards such as building height, lot coverage, building setbacks, landscaping, and lighting. As such, the proposed project is consistent with the County's zoning ordinance and the standards applicable to this zone and there would be no impact.
- d) **No Impact.** The subject site is located on relatively flat land within the fully urbanized West Carson area, where there are no Significant Ecological Areas or Hillside Management Areas. Consequently, the proposed project could not conflict with goals or policies for such areas.

References:

- Los Angeles County. 2009. List of Area/Community Plans. <http://planning.lacounty.gov/plans/adopted>.
- Los Angeles County. 2015. General Plan 2035. <http://planning.lacounty.gov/generalplan/generalplan>.

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) **No Impact.** The County depends on the State of California’s Geological Survey (State Department of Conservation, Division of Mines and Geology) to identify deposits of regionally significant aggregate resources. These clusters or belts of mineral deposits are designated as Mineral Resources Zones (MRZ-2s), and there are four major MRZ-2s are designated in the County: the Little Rock Creek Fan, Soledad Production Area, Sun Valley Production Area, and Irwindale Production Area. The project site is not located within any of these designated areas.

Additionally, there has been no mineral resource extraction on this site or surrounding properties in the recent past, and such activities are not known to have occurred in the distant past. There are no oil wells on-site, according to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources’ database of known well sites. As shown in Figure 9.6, Mineral Resources, in Chapter 9, Conservation and Natural Resources Element of the 2035 Los Angeles County General Plan, the proposed project site is not located in a designated “Mineral Resources Zone” or an “Oil and Gas Resources” zone. The proposed industrial development would have no effect on any known mineral resources.

- b) **No Impact.** Implementation of the proposed project would not 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. As stated above, the project site is not designated within a “Mineral Resource Zone” in the 2035 Los Angeles County General Plan, and the project would not cause a loss of availability of a designated mining site.

References:

- California Department of Conservation. 2018. Division of Oil, Gas & Geothermal Resources – Well Finder. Accessed February 23, 2018. <http://www.conservation.ca.gov/dog/Pages/Wellfinder.aspx>.
- Los Angeles County. 2015. General Plan 2035. <http://planning.lacounty.gov/generalplan/generalplan>.

13. NOISE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project result in:				
a) Exposure of persons to, or generation of, noise levels in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from parking areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from amplified sound systems?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

Responses provided below are based on the information and analysis provided in the *Noise Impact Analysis -Bridge Point South Bay Warehouse Project Noise*, prepared by VISTA Environmental in July 2019, as well as a supplemental report issued on July 26, 2019. Those reports, including all of the related calculations, modeling worksheets, and other appendix materials, are included in this Initial Study as Appendix L.

a) *Less Than Significant with Mitigation Incorporated.*

Construction-Related Noise

The construction activities for the proposed project are anticipated to include construction of a new, 10-foot-high, pre-cast concrete wall along the eastern site boundary, demolition of existing buildings and other site improvements, grading a total of 29,000 cubic yards (equal cut and fill) throughout the 8.9-acre project site, construction of a 203,877-square-foot warehouse facility, paving of a 221-space parking lot and on-site driveways, application of architectural coatings, connections to adjacent utility lines, and installation of

landscaping and irrigation lines. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors are single-family homes located as close as 15 feet from the east boundary of the project site. There are also single-family homes located as near as 70 feet west of the project site on the west side of Normandie Avenue and single-family homes located as near as 80 feet north of the project site on the north side of Torrance Boulevard.

Section 12.08.440(B)(1)(a) of the County's Code provides that construction noise from the short-term operation (less than 10 days) use of mobile equipment shall not exceed 75 dBA at the nearby single-family homes and shall not exceed 80 dBA at the nearby multi-family homes. In addition, Section 12.08.440(B)(1)(b) of the County's Code provides that construction noise from long-term operation (10 days or more) of stationary equipment shall not exceed 60 dBA at the nearby single-family homes and shall not exceed 65 dBA at the nearby multi-family homes. The mobile equipment and stationary equipment construction noise impacts have been analyzed separately below.

Mobile Equipment Construction Noise Impacts

Analysis of construction period noise impacts is based on the same construction phasing, durations and ranges of machinery and crew sizes estimated for each phase, described in Table 1, earlier in this report.

Due to the nature of all phases of building construction, and especially demolition and grading, where the equipment will be focused on one sub-area of the project until specifications are met and then will move on to the next sub-area of the project, it is not likely that mobile construction equipment would operate for 10 consecutive days or more in the direct vicinity of any nearby home. The specific sizes of such subareas will be determined by the responsible contractor, at the time of construction. This does not affect the determination of potential noise levels at neighboring homes, as that is based on the closest distance of peak levels of construction activity, which are accounted for in all of the noise calculations. Peak construction noise levels would be generated by concrete/industrial saws during demolition, and by excavators, graders, cranes, drill rigs, bulldozers and forklifts during other periods of construction, as shown in Table G, in the Noise Study (Appendix L of this Initial Study). Because any particular construction activity would not operate for more than 10 consecutive days near any neighboring home, pursuant to Section 12.08.440(B)(1)(a) of the County Code, it has been determined that the mobile equipment not to exceed threshold of 75 dBA at the nearby single-family homes and the not to exceed 80 dBA at the nearby multi-family homes is the appropriate noise threshold to analyze the mobile equipment during construction of the proposed project.

The mobile equipment construction noise impacts at the nearby residential property lines have been calculated through use of the Federal Highway Administration's Roadway Construction Noise Model (RCNM), which incorporates noise measurements from a variety of construction machinery and vehicles. Specific assumptions regarding the type and number of machinery and vehicles, acoustical factors, typical daily use of equipment types, and noise levels at various distances that would occur during the project's demolition and construction phases are provided in Table G in the Noise Study (Appendix L of this Initial Study). For the single-family homes located to the west of the project site, 6 dBA of noise reduction was applied for the existing 7- to 8-foot-high wall along the west side of Normandie Avenue. For each phase of construction, the nearest piece of equipment was placed at the shortest distance between the proposed activity and the nearest sensitive receptor and each subsequent piece of equipment was placed an additional 50 feet away. The results are shown below in Table 13-1, below.

The highest noise levels generated by construction equipment would occur during the demolition phase, when industrial/concrete saws are used to dismantle existing buildings and concrete pavement. This type of equipment generates noise levels of approximately 90 dBA at a distance of 50 feet. Excavators, dozers, graders, cranes, pavers and rollers generate noise levels of approximately 85 dBA at 50 feet. Jackhammers might be applied to demolish existing pavement, however concrete and pavement is usually torn up with a dozer or excavator, when there is room for this equipment to work. The construction equipment mix analyzed in the Noise Report is from the default equipment mix calculated in CalEEMod from the Air Report and is based on the construction phasing details identified in Table 1, in the Environmental Checklist Form portion of this Initial Study. The nearest sensitive noise receptors would be the existing single-family homes to the east.

Table 13-1 – Worst-Case Mobile Construction Noise Levels at Nearest Receptors Prior to Mitigation

Construction Phase ¹	Homes to East on Raymond Avenue ²		Homes to West on Normandie Avenue ³		Homes to North on Torrance Boulevard	
	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})
1. East Boundary Wall Construction (10 Feet High)	15	88	750	54	80	76
2. Demolition ²	15	78	70	71	80	76
3. Grading ²	15	78	70	72	80	77
4. Building Construction/ Architectural Coating ²	75	66	80	70	85	75
5. Paving and Site Improvements ²	25	71	80	67	85	72
County's Mobile Equipment Threshold ⁴		75		75		75/80⁵
Exceedances of County Standards?		Yes		No		Yes

Notes:

¹ Only the construction phases with mobile equipment were analyzed. Noise from on-road mobile sources (i.e., passenger vehicles and delivery trucks) was not modeled, as these sources generate much lower noise levels than the on-site machinery and also generate lower noise levels than the levels modeled for future traffic conditions on the surrounding roadway network, as summarized in Tables 13-7 through 13-9. As such, adding these on-road construction noise sources would have a nominal effect, if any, on the calculated noise levels. Stationary noise sources, such as air compressors and generators, are addressed immediately after the discussion of mobile construction noise impacts.

² 10-dBA sound attenuation was applied to the homes to the east to account for the new 10' tall pre-cast concrete wall that will be constructed in the first construction phase, before the subsequent demolition, grading, building construction and paving phases.

³ 6-dBA sound attenuation was applied to the homes to the west to account for the existing wall adjacent to Normandie Avenue.

⁴ County noise thresholds are not to exceed standards obtained from Section 12.08.440(B) of the County Code.

⁵ The single-family homes adjacent to the north side of Torrance Boulevard and east of Kenwood Avenue have a not to exceed 75-dBA threshold and the multi-family homes west of Kenwood Avenue have an 80-dBA not to exceed threshold.

Source: VISTA Environmental, August 2018.

Table 13-1 shows that, prior to mitigation, the County's mobile equipment construction noise not to exceed threshold for the nearby single-family homes of 75 dBA would be exceeded at the homes to the east and to the north (east of Kenwood Avenue), during the east boundary wall construction, demolition, and grading phases of construction. This would be considered a significant impact. The calculated noise levels at the single-family homes located to the west and the multi-family homes located to the north were below the County not to exceed noise standards of 75 dBA and 80 dBA, respectively.

To reduce mobile construction equipment noise to below the not to exceed 75-dBA significance threshold, a 14-foot-high temporary sound barrier would be required to be in place before construction of the proposed 10-foot-high concrete wall along the east boundary of the site. After the wall is finished and prior to demolition of existing site improvements, the 14-foot-high temporary barrier would need to be maintained along the east boundary, to provide construction noise mitigation for the single family properties immediately east, and a separate 12-foot-high temporary noise barrier would be erected along the easternmost 100 feet of the northern property line, to mitigate construction noise for the single family homes on the opposite (north) side of Torrance Boulevard. Mitigation Measure 13-1 will be imposed to ensure these temporary sound barriers are in place and to provide the specifications for the temporary barriers.

As shown in Table 13-2, this measure would reduce mobile construction noise levels to less than significant.

Table 13-2 – Mitigated Worst-Case Mobile Construction Noise Levels at Nearest Homes

Construction Phase ¹	Homes to East on Raymond Avenue		Homes to West on Normandie Avenue ³		Homes to North on Torrance Avenue	
	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})
1. East Boundary Wall Construction	15	74 ⁽²⁾	750	54	80	70 ⁽⁴⁾
2. Demolition	15	74 ⁽²⁾	70	71	80	70 ⁽⁴⁾
3. Grading	15	74 ⁽²⁾	70	72	80	71 ⁽⁴⁾
4. Building Construction/ Architectural Coating	75	68	80	70	85	75
5. Paving and Site Improvements	25	73	80	67	85	72
County's Mobile Equipment Threshold⁵		75		75		75/80⁶

¹ Only the construction phases with mobile equipment were analyzed (i.e., painting was not analyzed since it would be limited to stationary equipment).

² 14-dBA sound attenuation was applied to the homes to the east to account for Mitigation Measure 13-1 that requires a 14-foot-high temporary sound wall along the east boundary of the project site, to be constructed prior to commencement of work on the proposed project. This barrier would be constructed of plywood or other solid material and may be enhanced with acoustical blankets, to achieve this level of noise reduction.

³ 6-dBA sound attenuation was applied to the homes to the west to account for the existing wall on the west side of Normandie Avenue.

⁴ 6-dBA sound attenuation was applied to the homes to the north to account for the partial attenuation provided by Mitigation Measure 13-1 that requires the 14-foot-high temporary sound wall to be extended 100 feet along the north property line.

⁵ County Mobile and Stationary Equipment Noise Thresholds were obtained from Section 12.08.440(B) of the County Code.

⁶ The single-family homes adjacent to the north side of Torrance Boulevard and east of Kenwood Avenue have a not to exceed 75-dBA threshold and the multi-family homes west of Kenwood Avenue have an 80-dBA not to exceed threshold.

Source: VISTA Environmental, July 2019.

Stationary Equipment Construction Noise Impacts

The stationary equipment construction noise impacts at the nearby residential property lines have been calculated through use of the RCNM for a generator and air compressor, which are the only two types of stationary equipment anticipated. The results are shown in Table 13-3, indicating significant temporary impacts to nearby homes to the north, east and west, prior to mitigation.

Table 13-3 – Worst-Case Stationary Construction Noise Levels at Nearest Homes Prior to Mitigation

Construction Equipment	Homes to East on Raymond Avenue ¹		Homes to West on Normandie Avenue ²		Homes to North on Torrance Avenue	
	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})
Air Compressor	50	64	80	64	100	68
Generator	50	68	80	68	100	72
County's Stationary Equipment Threshold³		60		60		65⁴

¹ 10 dBA sound attenuation was applied to the homes to the east to account for the new east boundary wall that will be constructed in first phase of construction

² 6 dBA sound attenuation was applied to the homes to the West to account for the existing wall on the west side of Normandie Avenue.

³ County Mobile and Stationary Equipment not to exceed Noise Thresholds were obtained from Section 12.08.440(B) of the County Code.

⁴ It is unlikely that any stationary equipment would operate in the northeast corner of the project site, as such the threshold was limited to the multi-family homes west of Kenwood Avenue that have a 65-dBA not to exceed threshold.

Source: VISTA Environmental, July 2019.

To avoid a significant impact, Mitigation Measure 13-2 will be imposed to require a minimum 8-foot-high sound blanket or sound wall to be placed around three sides of the stationary air compressors and generators and that the stationary air compressors and generators shall be located a minimum of 100 feet away from any offsite residential property line. This measure is to be applied to small stationary equipment such as air compressors and generators that would be associated with work on or adjacent to the warehouse structure. No other stationary equipment is anticipated to be needed for work around the site perimeter. This mitigation would reduce the maximum stationary noise levels to below 60 dBA for any of the neighboring single-family homes to below 65 dBA for the multi-family units on the north side of Torrance Boulevard. This would reduce the impact to less than significant.

Table 13-4 presents the reduced stationary construction noise levels, with Mitigation Measures 13-1 and 13-2 in place. As shown, these measures would reduce stationary construction equipment noise levels to less than significant.

Table 13-4 – Mitigated Worst-Case Stationary Construction Noise Levels at Nearest Homes

Construction Equipment	Homes to East on Raymond Avenue ¹		Homes to West on Normandie Avenue ²		Homes to North on Torrance Avenue	
	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})	Distance (feet)	Noise Level (dBA L _{eq})
Air Compressor	100	50	100	54	100	60
Generator	100	54	100	58	100	64
County's Stationary Equipment Not to Exceed Thresholds³		60		60		65⁴

¹ 18 dBA sound attenuation was applied to the homes to the east to account for a 10-foot-high wall that will be constructed in the first phase of construction and Mitigation Measure 13-2 that requires an 8-foot-high sound blanket to be placed around the stationary equipment.

² 6 dBA sound attenuation was applied to the homes to the west to account for the existing wall on the west side of Normandie Avenue.

³ County Mobile and Stationary Equipment Noise not to exceed thresholds were obtained from Section 12.08.440(B) of the County Code.

⁴ It is unlikely that any stationary equipment would operate in the northeast corner of the project site, as such the threshold was limited to the multi-family homes west of Kenwood Avenue that have a 65-dBA not to exceed threshold.

Source: VISTA Environmental, July 2019.

Operational-Related Noise

The operation of the proposed project would generate noise from rooftop equipment, truck loading activities including forklifts, parking lot activities, on-site vehicle travel, and landscape maintenance.,

However, the warehouse building, site plan and operations have all been designed to minimize noise to adjacent uses. The truck loading bays are located at the rear (south side) of the building facing an adjacent industrial use. The east and west walls of the building structure would extend south along the edges of the full depth of the loading area, thus enclosing both sides of the loading dock area to screen truck-loading activities from neighboring residential properties to the east and west. The loading and unloading activities, including use of forklifts, would be confined inside the warehouse building pursuant to PDF 13-3, and the truck trailers would directly line up and be nearly flush with the warehouse opening for each trailer, thus limiting the amount of interior noise which could be heard outside the building. Nonetheless, for a very conservative analysis, the forklift activities for loading and unloading were modeled assuming the forklifts were located outdoors at the loading dock openings to the warehouse.

Outdoor activities would be limited and include regular site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas, and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels.

Further reducing noise impacts, the building would be setback 74 feet from the east property line, 84 feet from the Torrance Boulevard sidewalk to the north, 98 feet from the south property line, and 11 feet from the Normandie Avenue sidewalk to the west. The closest truck loading bay would be setback 250 feet from the closest residence to the east, and farther from all other residences; as described above, the truck loading bays would be inset into the building, therefore the building itself would act as a noise barrier. Trucks would be limited to using the Normandie Ave. driveway, as detailed in PDF 3-3. Trucks therefore would not pass closer on-site than 250 feet from the closest residence to the east. Additionally, as the trucks would be on-road vehicles, they would not be equipped with reverse beepers. A new, 10-foot high, pre-cast concrete wall would be constructed along the entire east boundary to provide a noise barrier for the homes adjacent to the east. Finally, no outdoor operations would be permitted within 74 feet of the eastern property line during night and early morning hours, as detailed in PDF 13-1.

Project Design Feature - 13-1: No outdoor operations shall be permitted within 74 feet of the eastern property line during night and early morning hours, which are to be determined.

Section 12.08.390(A) of the County's Code contains a not to exceed limit for exterior noise levels of 50 dBA between the hours of 7:00 a.m. and 10:00 p.m. and to 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. at the nearby homes. The County Code includes some exceptions to this noise standard: (1) Section 12.08.460 exempts truck loading and unloading activities if the activities occur between 6:00 a.m. and 10:00 p.m.; (2) Section 12.08.520 exempts refuse vehicles if the activities occur between 6:00 a.m. and 10:00 p.m.; (3) Section 12.08.570(B) exempts warning devices that include backup beepers on forklifts and trucks; and (4) Section 12.08.570(I) exempts motor vehicle noise on private property. Although such devices are exempt from these provisions of the County Code, PDF 13-2 will be implemented to prohibit use of back-up or reverse beepers to eliminate that potential noise source from trucks.

Project Design Feature 13-2: No trucks shall utilize back-up or reverse beepers while on the project site; however, all truck operations shall be consistent with OSHA requirements to ensure the safety of on-site workers.

Project Design Feature 13-3: Prior to issuance of a Certificate of Occupancy, the permittee/applicant shall provide verification that tenant leases or covenants recorded with any

future ownership changes shall require all loading equipment such as forklifts to be operated only indoors during project operations (i.e., non-construction).

Operational noise impacts generated on-site from the combined effects of rooftop mechanical equipment, truck loading activities, truck movements on-site between the loading docks and the Normandie Avenue driveway, parking lot activities, and forklift activities have been analyzed, along with the combined noise levels of on-site activities and vehicular traffic along the adjacent segments of Normandie Avenue and Torrance Boulevard. Potential noise levels were determined through application of the SoundPlan version 8.0 noise modeling software. This model accounts for stationary and mobile noise sources and the specific locations of nearby noise-sensitive land uses, with inputs for sound barriers, topography and building placement. All on-site noise sources have been included in the SoundPlan modeling, even if exempted by a provision of the County Code. Please refer to Figure 12, which shows the locations of the various “receiver locations” where noise levels were analyzed at neighboring residential properties.

Modeling Assumptions-On-Site Noise Sources

Noise attenuation associated with existing or proposed solid walls were incorporated into the SoundPlan model, including existing walls along the eastern site boundary, the proposed 10-foot-high precast concrete wall to be constructed along the eastern boundary, 8-foot-high solid walls to be constructed on both sides of the Normandie Avenue driveway gate, and an existing 7- to 8-foot-high wall along the west side of Normandie Avenue.

Noise from rooftop mechanical equipment atop the proposed warehouse building is accounted for, assuming the equipment covers up to 50 percent of the roof area, three feet above the roof level, and screened by a rooftop parapet. Noise levels associated with the rooftop equipment is based on measurements of such equipment found at existing commercial centers.

Noise levels at the truck loading dock area on the south side of the proposed warehouse is based on the numbers of truck trips per day identified in the traffic study (37 deliveries per day or 74 trips in/out of the site from the Normandie Avenue driveway only). Each truck off-loading/loading effort was estimated at 30 minutes. Approximately 2/3 of the truck trips and therefore 2/3 of the loading activities are anticipated to occur in day time and 1/3 at night. However, to provide a conservative analysis, the noise study also analyzed a scenario in which 2/3 of the daily truck trips, and therefore 2/3 of the loading activities, occurred during the nighttime. Noise from operating forklifts was calculated with the same assumptions in the air quality analysis with respect to the number and frequency of forklifts (i.e., three pieces of equipment operating a total of 8 hours per day in conjunction with the schedules of the truck deliveries). This analysis is conservative because the forklifts would operate inside the warehouse; therefore, the noise would be contained indoors. However, to provide a very conservative analysis, the forklift activities were modeled as if they would operate outdoors at the loading bay opening of the warehouse. Additionally, no credit was taken in the analysis for the prohibition on on-site nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.

Outdoor activities would be limited and include regular site maintenance, such as landscaping maintenance, occasional sweeping of parking and drive areas and trash pick-up. There would be no outside storage of any kind and no storage or dispensing of any fuels.

Modeling Assumptions for Roadway Noise

Noise from traffic along the adjacent segments of Torrance Boulevard and Normandie Avenue was calculated on the basis of the without and with-project traffic volumes identified in the Traffic Study prepared for this project. The same roadway volumes, trip distributions and vehicle mixes were applied in the noise modeling, along with posted roadway speeds. The vehicle mix for the on-site driveways is the

same as what is identified in the traffic study. Approximately 2/3 of the truck trips are anticipated to occur in day time and 1/3 at night. However, to provide a conservative analysis, the noise study also analyzed a scenario in which 2/3 of the daily truck trips occurred during the nighttime. All truck traffic would arrive/depart from Normandie Avenue, pursuant to PDF 3-3.

Noise Impacts from On-Site Operations Only

Table 13-5 shows that the combined noise level from all on-site noise sources at the nearest homes would be as high as approximately 43 dBA L_{eq} in the daytime, as high as approximately 41 dBA L_{eq} in the evening, and as high as approximately 42 dBA L_{eq} in the late-night hours. This is the anticipated scenario that assumes 1/3 of the truck trips would occur during nighttime hours. Table 13-6 shows the combined noise levels assuming a scenario where 2/3 of the truck trips would occur during nighttime hours. As shown therein, maximum noise levels during the late-night hours would increase slightly, and would remain below the County's not to exceed 45 dBA L_{eq} nighttime standard. In every case analyzed, the project's on-site combined noise levels would be below the County Code's not to exceed standards for the nearest homes to the north, east and west and would, therefore, be less than significant. Additionally, pursuant to PDF 13-1, outdoor operations would be prohibited within 74 feet of the eastern property line during night and early morning hours, which would further reduce nighttime noise generated by the project.

Table 13-5 – Operational Noise Levels from Onsite Sources at the Nearby Homes, Assuming 1/3 of Truck Trips During Nighttime Hours

Site No	Location	Noise Level (dBA L_{eq}) ¹		
		Daytime ²	Evening ³	Nighttime ⁴
A	North of Project Site	40.0	41.3	39.4
B	Northeast of Project Site	33.4	34.8	34.0
C	Northeast of Project Site	35.7	37.0	35.6
D	East of Project Site	35.8	37.0	36.6
E	East of Project Site	37.1	37.8	37.5
F	East of Project Site	37.6	37.2	37.5
G	South of Project Site	33.6	32.3	33.1
H	Southwest of Project Site	42.6	40.3	41.8
I	West of Project Site	42.1	39.8	41.6
J	West of Project Site	36.7	35.5	36.7
K	West of Project Site	32.4	33.7	32.6
County Noise Standards⁵		50	50	45
Exceed County Standards		No	No	No

Notes:

¹ Noise level calculated from SoundPlan Version 8.0 and based on construction of a 10-foot-high sound wall on the east side of the project site and an 8-foot-high wall on both sides of Driveway 1 (Normandie Avenue Driveway).

² Daytime defined as 7:00 a.m. to 7:00 p.m.

³ Evening defined as 7:00 p.m. to 10:00 p.m.

⁴ Nighttime defined as 10:00 p.m. to 7:00 a.m.

⁵ County Noise Standards from Section 12.08.390(A) of the County Code.

* To provide a conservative analysis, no credit was taken in this analysis for the prohibition on nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.



0 100 200
Feet

FIGURE 13

Operational Noise Impact Modeling Locations

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Table 13-6 - Operational Noise Levels from Onsite Sources at the Nearby Homes, Assuming 2/3 of Truck Trips During Nighttime Hours

Site No	Location	Noise Level (dBA L _{eq}) ¹		
		Daytime ²	Evening ³	Nighttime ⁴
A	North of Project Site	39.9	41.3	39.4
B	Northeast of Project Site	33.3	34.9	34.1
C	Northeast of Project Site	35.6	37.1	35.7
D	East of Project Site	35.5	37.3	37.0
E	East of Project Site	36.3	38.6	38.4
F	East of Project Site	35.9	38.8	39.2
G	South of Project Site	31.3	34.7	35.3
H	Southwest of Project Site	39.7	43.5	44.5
I	West of Project Site	39.4	42.8	44.0
J	West of Project Site	34.7	37.6	38.5
K	West of Project Site	32.3	33.8	32.7
County Noise Standards⁵		50	50	45
Exceed County Standards		No	No	No

Notes:

¹ Noise level calculated from SoundPlan Version 8.0 and based on construction of a 10-foot-high sound wall on the east side of the project site and an 8-foot-high wall on both sides of Driveway 1 (Normandie Avenue Driveway).

² Daytime defined as 7:00 a.m. to 7:00 p.m.

³ Evening defined as 7:00 p.m. to 10:00 p.m.

⁴ Nighttime defined as 10:00 p.m. to 7:00 a.m.

⁵ County Noise Standards from Section 12.08.390(A) of the County Code.

* To provide a conservative analysis, no credit was taken in this analysis for the prohibition on nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.

Mitigation Measures – Construction Impacts

Mitigation Measure 13-1: Prior to construction of the 10-foot-high pre-caste concrete wall along the east property boundary, the contractor shall erect a temporary, minimum 14-foot-high sound wall along the shared property line with residential uses on the east side of the project site. The temporary sound wall shall be constructed with a minimum 5/8-inch plywood or oriented strand board consisting of a sound insulating material or covered with acoustic blankets to achieve a minimum Sound Transmission Class (STC) rating of 20. Prior to commencement of the subsequent demolition and construction phases, a temporary sound barrier of the same specifications shall be maintained along the eastern property boundary; this 14-foot-high barrier may be a stand-alone structure or may include the new wall. In addition, a 14-foot-high temporary sound barrier shall be erected along the easternmost 100 feet of the northern property line. This barrier shall be constructed with a minimum 5/8-inch plywood or oriented strand board consisting of a sound insulating material or covered with acoustic blankets to achieve a minimum Sound Transmission Class (STC) rating of 20. These barriers shall remain in place throughout the demolition and construction phases.

Mitigation Measure 13-2: During all construction activities, a minimum 8-foot-high sound blanket or sound wall shall be placed around three sides of any air compressors and generators that are utilized onsite and this stationary equipment shall be located a minimum of 100 feet away from any residential property line.

b) *Less Than Significant Impact.*

Construction-Related Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. Vibration impacts from construction activities associated with the proposed project would typically be created from the operation of heavy off-road equipment, such as bulldozers, excavators, scrapers, loaded trucks, etc. The nearest sensitive receptors are single-family homes located as close as 15 feet from the east boundary of the project site. There are also single-family homes located as near as 70 feet west of the project site on the west side of Normandie Avenue and single-family homes located as near as 80 feet north of the project site on the north side of Torrance Boulevard.

Section 12.08.560 of the County's Code restricts the operation of any device that creates a vibration level above 0.01 inches per second at the property line. Section 12.08.570 of the County's Code exempts construction activities from the vibration standards, provided construction activities occur between 7:00 a.m. and 7:00 p.m. on weekdays, excluding holidays. Since the County does not provide a quantifiable vibration level for construction activities that occur during the allowed time frame, the Caltrans standards have been utilized, which defines the threshold of perception from transient sources, including mobile construction equipment, as 0.25 inches per second peak particle velocity (PPV). Caltrans research also determined that damage to older buildings could occur at a vibration level of 0.5 inch per second PPV.

The primary source of vibration during construction would be from the operation of a large bulldozer. As shown in Table 13-7, a large bulldozer would create a vibration level of 0.089 inches per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest off-site residential structure would be 0.15 inches per second PPV.⁵² Caltrans research found that transient sources become distinctly perceptible to humans at 0.25 inches per second PPV and that potential damage to older buildings could occur at 0.5 inches per second PPV. Construction activities associated with the proposed project would be below the distinctly perceptible levels of vibration or the threshold for potential building damage at the nearby sensitive receptors. Impacts would be less than significant.

Table 13-7 – Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second)	Approximate Vibration Level (Lv) at 25 feet
Hoe ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

⁵² The propagation rate was determined through this formula:

$$v_b = v_a (r_a / r_b)^y$$

Where:

v_a = vibration amplitude of the source at distance r_a

v_b = vibration amplitude at distance r_b

y = geometric attenuation coefficient (1.1 was used that is for Hard Soils: dense compacted sand or clay with some exposed rock (cannot dig with a shovel))

Operations-Related Vibration Impacts

The proposed project would result in the operation of semi-trucks on the project site, which are a known source of vibration. Semi-trucks would arrive and depart only at the Normandie Avenue driveway, which is located as near as 80 feet east of the single-family homes located on the west side of Normandie Avenue.

Section 12.08.560 of the County's Code restricts the operation of any device that creates vibration which is above the vibration threshold or a vibration level above 0.01 inches per second root mean square (RMS). Since a vibration level of 0.01 inches-per-second RMS is only perceptible when a person is sitting or lying down, this threshold is applicable to residential structures, where these activities typically occur.

Caltrans has done extensive research on vibration levels created along freeways and state routes. Its vibration measurements of these roads have never exceeded 0.08 inches per second PPV at 15 feet from the center of the nearest lane, with the worst combinations of heavy trucks.⁵³ Based on typical propagation rates, the vibration level at the nearest off-site residential structure (80 feet away) would be 0.007 inches per second RMS. The vibration level created from semi-trucks operating on-site would be below the County's 0.01 inches per section RMS vibration threshold; therefore, impacts would be less than significant.

c) *Less Than Significant Impact.*

Roadway Vehicular Noise

The proposed project would generate additional vehicular traffic on the nearby roadways, which would have the potential to create a substantial permanent increase in ambient noise levels. Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. The level of traffic noise depends on three primary factors: (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. Since neither the General Plan nor the County Code provides any policy or regulation defining what constitutes a "substantial permanent increase to ambient noise levels," the noise increase threshold developed by the Federal Transit Administration (FTA) for a moderate impact (see Table A in the Noise Study) has been utilized. This threshold determined that a significant impact would occur if a project increased the noise by 3 dBA, where the ambient noise level is 55 dBA or less; by 2 dBA, where the ambient noise level is between 55 and 60 dBA CNEL (Community Noise Equivalent Level); or by 1 dBA, where the ambient noise level is between 60 and 75 dBA CNEL.⁵⁴

The potential off-site traffic noise impacts created by the ongoing operations of the proposed project were analyzed through utilization of the FHWA model and parameters; the FHWA model noise calculation spreadsheets are provided in Appendix E of the VISTA Environmental noise study. The proposed project's off-site traffic noise impacts have been analyzed for both the existing, opening year, and cumulative conditions, which are discussed below.

Existing Conditions

The proposed project's potential off-site traffic noise impacts have been calculated through a comparison of the existing scenario with the existing with project scenario. The results of this comparison are shown

⁵³ Caltrans, [Transportation and Construction Vibration Guidance Manual](#), September 2013.

⁵⁴ Table A in the Noise Study expresses noise levels as Leq and Ldn. The County relies on the CNEL noise standard to assess transportation-related impacts on sensitive land uses because it is a more conservative assessment of such impacts. As the Noise Study explains, unlike Ldn, CNEL adds 4.77 decibels to sound levels during the evening hours between 7 p.m. and 10 p.m. These additions are made to the sound levels during these periods because there is heightened sensitivity to sound levels during the evening and nighttime hours because there is a decrease in ambient noise levels. This is why sound appears louder in the evening and nighttime hours and is weighted accordingly.

in Table 13-8. Note that roadways with higher (i.e. louder) existing sound levels have lower significance thresholds, meaning that project noise generated on those roadways trigger significant impacts more easily than on other roadways. As an example, the four roadway segments with the highest existing noise levels in Table 13-7 have a significance threshold of only +1 dBA due to their already loud ambient levels, whereas the roadway segment with a lower existing noise level has a significance threshold of +3 dBA.

Table 13-8 – Existing Year Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor ¹			Increase Threshold
		Existing	Existing with Project	Project Contribution	
Normandie Avenue	North of Torrance Boulevard	70.5	70.5	0.0	+1 dBA
Normandie Avenue	South of Torrance Boulevard	71.8	71.9	0.1	+1 dBA
Normandie Avenue	South of Driveway 1	70.3	70.3	0.0	+1 dBA
Kenwood Avenue	North of Torrance Boulevard	53.5	53.5	0.0	+3 dBA
Vermont Avenue	North of Torrance Boulevard	69.3	69.3	0.0	+1 dBA
Vermont Avenue	South of Torrance Boulevard	68.1	68.1	0.0	+1 dBA
Torrance Boulevard	West of Normandie Avenue	72.3	72.3	0.0	+1 dBA
Torrance Boulevard	East of Driveway 2	72.0	72.1	0.1	+1 dBA
Torrance Boulevard	East of Kenwood Avenue/Driveway 3	71.1	71.1	0.0	+1 dBA
Torrance Boulevard	West of Vermont Avenue	70.9	71.0	0.1	+1 dBA
Torrance Boulevard	West of Hamilton Avenue	71.3	71.4	0.1	+1 dBA

Notes:

¹Distance to nearest residential uses along each roadway segment are shown in Table H in the Noise Study. Noise levels do not take into account existing noise barriers.

² Increase threshold obtained from the FTA's allowable noise impact exposures detailed in the Noise Study.

Source: FHWA Traffic Noise Prediction Model FHWA-RD-77-108.

As shown in Table 13-8, under existing conditions, permanent noise increases at nearby homes brought about by additional vehicular traffic as a result of the project would not exceed the significance thresholds. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels for the existing conditions. Impacts would be less than significant.

Cumulative Conditions

The proposed project's potential off-site traffic noise impacts have been calculated through a comparison of the cumulative without project scenario to the cumulative with project scenario. The results of this comparison are shown in Table 13-9.

Table 13-9 – Cumulative Project Traffic Noise Contributions

Roadway	Segment	dBA CNEL at Nearest Receptor ¹			Increase Threshold
		Cumulative No Project	Cumulative with Project	Project Contribution	
Normandie Avenue	North of Torrance Boulevard	70.7	70.7	0.0	+1 dBA
Normandie Avenue	South of Torrance Boulevard	72.0	72.0	0.0	+1 dBA
Normandie Avenue	South of Driveway 1	70.5	70.5	0.0	+1 dBA
Kenwood Avenue	North of Torrance Boulevard	53.5	53.5	0.0	+3 dBA
Vermont Avenue	North of Torrance Boulevard	69.3	69.3	0.0	+1 dBA

Roadway	Segment	dBA CNEL at Nearest Receptor ¹			
		Cumulative No Project	Cumulative with Project	Project Contribution	Increase Threshold
Vermont Avenue	South of Torrance Boulevard	68.1	68.1	0.0	+1 dBA
Torrance Boulevard	West of Normandie Avenue	72.6	72.6	0.0	+1 dBA
Torrance Boulevard	East of Driveway 2	72.4	72.5	0.1	+1 dBA
Torrance Boulevard	East of Kenwood Avenue/Driveway 3	71.4	71.4	0.0	+1 dBA
Torrance Boulevard	West of Vermont Avenue	71.3	71.3	0.0	+1 dBA
Torrance Boulevard	West of Hamilton Avenue	71.7	71.8	0.1	+1 dBA

Notes:

¹ Distance to nearest residential use along each roadway segment are shown in Table H in the Noise Study. Noise levels do not take into account existing noise barriers.

² Increase threshold obtained from the FTA's allowable noise impact exposures detailed in the Noise Study.

Source: FHWA Traffic Noise Prediction Model FHWA-RD-77-108.

Table 13-9 shows that for the cumulative conditions, permanent noise increases on nearby sensitive receptors brought about by additional vehicular traffic as a result of the project would not exceed the significance thresholds. Therefore, the proposed project would not produce a substantial permanent increase in ambient noise levels on nearby sensitive receptors for the cumulative conditions. Impacts would be less than significant.

On-site Noise Sources

The analysis provided above in the response to threshold 13 a) found that the combined noise levels from all on-site noise sources at the nearest homes to the north, east and west of the project site would be below the day time and night time not to exceed limits defined in the County noise standards for each analyzed group of homes. The project would not, therefore, result in a substantial permanent increase in ambient noise levels, including noise from parking areas. Impacts would be less than significant.

Additionally, pursuant to PDF 13-1, outdoor operations would be prohibited within 74 feet of the eastern property line during night and early morning hours, which would further reduce nighttime noise generated by the project.

Combined Offsite Roadway and Onsite Noise Impacts

The proposed project's combined offsite roadway and onsite noise impacts have been analyzed in the SoundPlan Model for the existing and cumulative traffic conditions, as summarized in Table 13-10 and Table 13-11, below. As shown in these two tables, the combination of the project's on-site noise sources and the project's new traffic would result less than significant impacts in noise levels at the surrounding residential properties (see Figure 12), based on the significance thresholds identified earlier with respect to changes in roadway noise impacts only. As shown in Table 13-10, for existing conditions, noise level contributions from the proposed project to the nearby homes, assuming 1/3 of the truck trips occur during nighttime hours, would range from -3.8 to 0.5 CNEL. As shown in Table 13-11, for cumulative year conditions, noise level contributions from the proposed project to the nearby homes, also assuming 1/3 of the truck trips occur during nighttime hours, would range from -3.7 to 0.4 dBA CNEL. In both scenarios, the decrease in noise to some of the homes on the east side of the project site is due to construction of the proposed 10-foot-high wall along the eastern site boundary. In other locations, the level of increase attributable to the project would be less than one decibel and thus likely not perceptible. Tables 13-12 and 13-13 provide combined offsite roadway noise and onsite noise level contributions from

the project for existing and cumulative conditions, assuming 2/3 of the truck trips occur during nighttime hours. These tables demonstrate similar results as for the 1/3 nighttime truck scenario, with project noise level contributions ranging from -3.6 to 0.6 dBA CNEL for existing conditions and from -3.7 to 0.4 dBA CNEL for cumulative conditions. The combined on-site noise sources plus increases in traffic noise attributable to the proposed project would thus have a less-than-significant permanent impact on ambient noise levels.

Additionally, pursuant to PDF 13-1, outdoor operations would be prohibited within 74 feet of the eastern property line during night and early morning hours, which would further reduce nighttime noise generated by the project.

Table 13-10 – Existing Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 1/3 Nighttime Truck Trips

Site No	Location	Noise Level (dBA CNEL)		Project Contribution	Increase Threshold
		Existing	Existing Plus Project ¹		
A	North of Project Site	74.1	74.2	0.1	+1 dBA
B	Northeast of Project Site	71.2	71.4	0.2	+1 dBA
C	Northeast of Project Site	68.6	68.7	0.1	+1 dBA
D	East of Project Site	57.6	55.3	-2.3	+2 dBA
E	East of Project Site	55.9	52.1	-3.8	+2 dBA
F	East of Project Site	53.0	50.3	-2.7	+3 dBA
G	South of Project Site	46.6	45.2	-1.4	+3 dBA
H	Southwest of Project Site	66.5	66.7	0.2	+1 dBA
I	West of Project Site	66.1	66.5	0.4	+1 dBA
J	West of Project Site	66.9	67.4	0.5	+1 dBA
K	West of Project Site	69.6	69.7	0.1	+1 dBA

Notes:

¹ Based on construction of a 10-foot-high sound wall on the east side of the project site and an 8-foot-high wall on both sides of Driveway 1 (Normandie Avenue Driveway).

* To provide a conservative analysis, no credit was taken in this analysis for the prohibition on nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.

Table 13-11 – Cumulative Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 1/3 Nighttime Truck Trips

Site No	Location	Noise Level (dBA CNEL)		Project Contribution	Increase Threshold
		Cumulative	Cumulative Plus Project ¹		
A	North of Project Site	74.4	74.6	0.2	+1 dBA
B	Northeast of Project Site	71.5	71.8	0.3	+1 dBA
C	Northeast of Project Site	68.9	69.1	0.2	+1 dBA
D	East of Project Site	57.9	55.6	-2.3	+2 dBA
E	East of Project Site	56.1	52.4	-3.7	+2 dBA
F	East of Project Site	53.2	50.6	-2.6	+3 dBA
G	South of Project Site	46.8	45.5	-1.3	+3 dBA
H	Southwest of Project Site	66.6	66.9	0.3	+1 dBA

Site No	Location	Noise Level (dBA CNEL)		Project Contribution	Increase Threshold
		Cumulative	Cumulative Plus Project ¹		
I	West of Project Site	66.3	66.7	0.4	+1 dBA
J	West of Project Site	67.1	67.5	0.4	+1 dBA
K	West of Project Site	69.8	69.9	0.1	+1 dBA

Notes:

¹ Based on construction of a 10-foot-high sound wall on the east side of the project site and an 8-foot-high wall on both sides of Driveway 1 (Normandie Avenue Driveway).

Source: SoundPlan Version 8.0

* To provide a conservative analysis, no credit was taken in this analysis for the prohibition on nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.

Table 13-12 – Existing Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 2/3 Nighttime Truck Trips

Site No	Location	Noise Level (dBA CNEL)		Project Contribution	Increase Threshold
		Existing	Existing Plus Project ¹		
A	North of Project Site	74.1	74.4	0.3	+1 dBA
B	Northeast of Project Site	71.2	71.5	0.3	+1 dBA
C	Northeast of Project Site	68.6	68.9	0.3	+1 dBA
D	East of Project Site	57.6	55.4	-2.2	+2 dBA
E	East of Project Site	55.9	52.3	-3.6	+2 dBA
F	East of Project Site	53.0	50.7	-2.3	+3 dBA
G	South of Project Site	46.6	45.7	-0.9	+3 dBA
H	Southwest of Project Site	66.5	66.8	0.3	+1 dBA
I	West of Project Site	66.1	66.7	0.6	+1 dBA
J	West of Project Site	66.9	67.5	0.6	+1 dBA
K	West of Project Site	69.6	69.8	0.2	+1 dBA

Notes:

¹ Based on construction of a 10-foot-high sound wall on the east side of the project site and an 8-foot-high wall on both sides of Driveway 1 (Normandie Avenue Driveway).

* To provide a conservative analysis, no credit was taken in this analysis for the prohibition on nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.

Table 13-13 – Cumulative Year Combined Offsite Roads and Onsite Noise Level Contributions, Assuming 2/3 Nighttime Truck Trips

Site No	Location	Noise Level (dBA CNEL)		Project Contribution	Increase Threshold
		Cumulative	Cumulative Plus Project ¹		
A	North of Project Site	74.4	74.6	0.2	+1 dBA
B	Northeast of Project Site	71.5	71.8	0.3	+1 dBA
C	Northeast of Project Site	68.9	69.1	0.2	+1 dBA
D	East of Project Site	57.9	55.6	-2.3	+2 dBA
E	East of Project Site	56.1	52.4	-3.7	+2 dBA
F	East of Project Site	53.2	50.6	-2.6	+3 dBA

Site No	Location	Noise Level (dBA CNEL)		Project Contribution	Increase Threshold
		Cumulative	Cumulative Plus Project ¹		
G	South of Project Site	46.8	45.5	-1.3	+3 dBA
H	Southwest of Project Site	66.6	66.9	0.3	+1 dBA
I	West of Project Site	66.3	66.7	0.4	+1 dBA
J	West of Project Site	67.1	67.5	0.4	+1 dBA
K	West of Project Site	69.8	69.9	0.1	+1 dBA

Notes:

¹ Based on construction of a 10-foot-high sound wall on the east side of the project site and an 8-foot-high wall on both sides of Driveway 1 (Normandie Avenue Driveway).

Source: SoundPlan Version 8.0

* To provide a conservative analysis, no credit was taken in this analysis for the prohibition on nighttime outdoor operations within 74 feet of the eastern property line, as required by PDF 13-1.

- d) ***Less Than Significant with Mitigation Incorporated.*** Please refer to the earlier response to 13 a) regarding temporary construction noise impacts and the recommended mitigation measures that would reduce those impacts to less than significant. There would be no temporary or periodic noise increases associated with the fully developed and operational project site, beyond those discussed in the response to 13 a).
- e, f) ***Less Than Significant Impact.*** The proposed project would not expose people residing or working in the project area to excessive noise levels from aircraft. The nearest public use airport is Torrance Airport - Zamperini Field, which is a general aviation airport located 5.3 miles southwest of the project site at 3301 Airport Drive in the City of Torrance. According to the City of Torrance General Plan Noise Element, the 60 dBA noise contours are all within the boundaries of the Airport. The nearest private airstrip is Goodyear Blimp Base Airport, which is located 1.5 miles northeast of the project site at 19200 S. Main Street in the City of Gardena. Due to the nominal number of take-offs and landings from this Airport, no noise contour maps have been developed, however it is likely that the area of highest noise levels entirely occurs within the boundaries of the Airport. Impacts to the proposed project would be less than significant.

References:

VISTA Environmental. 2019. *Noise Impact Analysis – Bridge Point South Bay II Warehouse Project*.

_____. 2019. *Memorandum: Nighttime Truck Noise Impacts from the Bridge Point South Bay II Warehouse Project*

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Cumulatively exceed official regional or local population projections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) **No Impact.** The proposed project involves demolishing the existing five buildings (an office building, two storage buildings, an instruction building, and a maintenance building) and constructing an approximately 203,877-square-foot industrial warehouse. No housing units would be developed as part of the proposed project, and no new or expanded urban infrastructure would be constructed that could foster increased development at surrounding properties. As such, the proposed project is expected to have no impact with respect to inducing population growth, either directly or indirectly.
- b) **No Impact.** There is no existing housing on the proposed project site. As mentioned above, the five buildings currently on-site are utilized for office, instruction, maintenance, and storage. Construction of the proposed industrial warehouse, therefore, would not displace any housing. Thus, the project would not necessitate the construction of replacement housing elsewhere and no impact would occur.
- c) **No Impact.** There is no existing housing on the proposed project site and there is no active land use; thus, there are no people present on any regular basis. Construction of the proposed industrial warehouse would not displace any people. Thus, the project would not necessitate the construction of replacement housing elsewhere and no impact would occur.
- d) **No Impact.** The proposed industrial warehouse development project does not include housing; therefore, there would be no increase in residential population due to the proposed project and the project would have no impact with regard to regional or local population projections.

When the new warehouse building is fully leased to future tenant(s), there would be a new employee population on-site, which could vary from the number of employees associated with the previous land use. Based on the passenger vehicle trip generation estimates in the Traffic Impact Analysis prepared for this project (Appendix M of this Initial Study), it is estimated that there could be roughly 140 employees on-site. The employee density would depend on the type of warehouse business(es) that operate here. The proposed project is intended to capture a portion of the existing demand for additional

logistics/distribution space in Southern California and in proximity to the Ports of Los Angeles and Long Beach. There are no unusual circumstances associated with the proposed project design or location that would indicate there could be a substantial difference in employment characteristics that could affect local or regional employment forecasts.

15. PUBLIC SERVICES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sheriff protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Libraries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

Fire Protection

- a) ***Less Than Significant Impact.*** Fire suppression services are provided by the Los Angeles County Fire Department (LACoFD), which operates 9 divisions, 22 battalions, and 10 fire suppression camps, servicing 59 cities and the whole unincorporated area of Los Angeles County.⁵⁵ The LACoFD currently has 173 fire stations (including FS55 and FS155 on Catalina Island), 268 fire engines (including 500 series), 33 quints,⁵⁶ 72 paramedic squads, 21 patrols, 10 wildland fire suppression camps, 10 bulldozers, 8 helicopters, 2 Urban Search and Rescue (USAR) teams, 1 FEMA USAR task force, 4 Hazardous Materials Team, 70 lifeguard vehicles and rescue boats, 27 prevention offices, 11 forestry units and numerous other response vehicles and facilities.⁵⁷ The LACoFD uses national guidelines of a 5-minute response time for the first-arriving unit for fire and emergency medical services (EMS) responses and 8 minutes for the advanced life support (paramedic) unit in urban areas.

⁵⁵ Takeshita, Michael Y., Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, Correspondence to Erica Gutierrez, Analyst, Department of Regional Planning, Planning Department Regarding Initial Study, "Bridge Point South Bay II, is a Request for a Conditional Use Permit (CUP) to Authorize the Proposed Redevelopment of an 8.94-Acre Industrial Site with a New 203,807-Square-Foot Concrete Warehouse Building, Including Approximately 10,000 Square Feet of Ancillary Space, and Various Site Improvements, 20850 Normandie Avenue, Torrance, FFER 201800147," January, 24, 2019.

⁵⁶ A quint is a fire service apparatus that serves as a combination engine and ladder truck.

⁵⁷ Takeshita, Michael Y., Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, Correspondence to Erica Gutierrez, Analyst, Department of Regional Planning, Planning Department Regarding Initial Study, "Bridge Point South Bay II, is a Request for a Conditional Use Permit (CUP) to Authorize the Proposed Redevelopment of an 8.94-Acre Industrial Site with a New 203,807-Square-Foot Concrete Warehouse Building, Including Approximately 10,000 Square Feet of Ancillary Space, and Various Site Improvements, 20850 Normandie Avenue, Torrance, FFER 201800147," January, 24, 2019.

The nearest fire station to the project site is LACoFD Station 36, located at 127 West 223rd Street in the City of Carson, approximately 1.7 miles southeast. This station provides EMS, fire and rescue services, and safe haven services for unincorporated Los Angeles County and for contract cities. The next closest LACoFD fire station is Station 116, located at 755 East Victoria Street in the City of Carson, approximately 3 miles northeast of the project site. City of Los Angeles Fire Department, Station 79, located at 18030 S. Vermont Avenue in the City of Gardena, is approximately 1.8 miles southeast of the project site. This station provides fire and rescue services, primarily in the City of Los Angeles.

The proposed project could have some impact on fire department services, if a fire should occur on-site and/or if there should be some sort of medical emergency among employees or visitors. This impact would not be significant, as there is nothing unique about this proposed warehouse/distribution facility that would result in more risk of fires or medical emergencies, compared to any other warehouse facilities in the region. The building and all site improvements must be designed to comply with all applicable fire safety codes enforced by the County of Los Angeles, which will be verified during the County's routine plan check and building permit procedures. This will occur for permitting of the warehouse core and shell structure, and then again, when specific tenant(s) are identified and additional interior improvement plans are submitted for County review and approval. There is no outdoor storage proposed, which results in a very low risk of an accidental or intentional fire that might occur with outdoor storage facilities. Aside from truck loading and unloading, employee traffic on-site, and routine site and landscape maintenance, all activities would be conducted within the building interior. There would be no on-site fuel storage or dispensing, and therefore no potential for fire or explosion from those sources. Additionally, considering the existing firefighting resources available at two nearby fire stations, this project would not be outside of the preferred response times.

In its review of the preliminary project development plans, the LACoFD did not identify any unique operational or design concerns that would indicate a potential for an adverse impact on fire response capabilities or a need to construct any new or expanded fire stations. The proposed site plan has been revised to incorporate the LACoFD requirements for site access and circulation and placement of fire hydrants. Compliance with existing regulatory standards and the project-specific requirements identified by LACoFD will be confirmed through the County's routine building permit process. Permits will not be issued, and occupancy of the completed site improvements will not be granted, unless all requirements are met. In addition, as discussed in Hazards and Hazardous Materials responses g) and h iii), the project will not have a significant impact in relation to emergency fire access or fire flow. Therefore, impacts on fire protection services would be less than significant.

Sheriff Protection

- b) ***Less Than Significant Impact.*** Law enforcement services in the unincorporated Los Angeles County are provided by the Los Angeles County Sheriff's Department. The sheriff's department strives to maintain a service ratio of approximately one officer for every 1,000 residents within the communities it serves. The nearest sheriff's station to the project site is the Carson Station in the City of Carson, located at 21356 South Avalon Boulevard, and approximately 2 miles east of the project site (Los Angeles County 2014).

The proposed project site is currently zoned for Manufacturing Industrial Planned Development (MPD), and the proposed warehouse project is consistent with this zoning designation. The project site has been developed since the late 1940s with a variety of commercial and industrial uses and there are a number of industrial land uses, including other warehouses, in the project vicinity. The most recent site occupant vacated the site in late 2017. The proposed warehouse, therefore, does not represent a new development of previously undeveloped property or creation of a unique land use type that could generate unique law enforcement challenges within the Sheriff Department's service territory. The proposed operations would occur seven days a week, 24 hours a day, so tenants and their internal security personnel would be present at all times, which would deter criminal activity. Electronically or manually controlled metal gates would

be placed at the main drive entrances on both Normandie Avenue and Torrance Boulevard, to restrict access to the site interior and loading docks to employees and vehicles directly associated with the business operations. Additionally, as discussed in Aesthetics response d), the proposed project would include outdoor lighting fixtures to provide minimum safe illumination levels for employees and truckers who are active after daylight hours, at night, and in the early morning periods. This night lighting would further deter potential criminal activity. As noted in the above response to fire protection concerns, there would be no outside storage and thus, no attraction for potential thieves or others who might want to intrude into those areas for unauthorized purposes.

Given these proposed design features and operational characteristics, development of the proposed project is not expected to result in a need for new or expanded sheriff's facilities or additional staffing resources. Therefore, the proposed project would not result in a need to construct new or expanded sheriff facilities to provide the resources required to maintain adequate levels of police protection in this area. Project impacts would be less than significant.

Schools

- c) ***No Impact.*** The proposed warehouse/distribution project would not add to the resident population and would not generate new students who might attend campuses in the local school district. If other types of light industrial land uses permitted in the MPD zone should lease space in the proposed building, there would still be no new residents and no impact on local school district facilities. Therefore, the project would not increase the demand on local schools, and no impact would occur.

Parks

- d) ***No Impact.*** The proposed project does not involve park development or displacement. Demand for parks is determined by the residential population of the parks' service areas since job-holders in a particular area may not live in that same area and rarely frequent local parks during their work day. The project would not add dwelling units or cause an increase in the residential population of the surrounding community. Therefore, the project would not increase the demand for parks, and no impact would occur.

Libraries

- e) ***No Impact.*** The proposed project would not directly or indirectly lead to an increase in population in the project area and would thus not add to any normal demand for library services. Additionally, the proposed project would not require the use or maintenance of libraries. Therefore, no impact to libraries would occur.

Other Public Facilities

- f) ***No Impact.*** As mentioned above, the proposed project would not directly or indirectly lead to an increase in residential population in the project area and would therefore not require the use or maintenance of other public facilities that are provided to benefit local residents. Therefore, no impact to other public facilities would occur.

References:

County of Los Angeles Fire Department. 2012. County of LA Fire Department Strategic Fire Plan.
<http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf1196.pdf>.

———. 2017a. Search results: fire stations.

<https://locator.lacounty.gov/fire/Search?find=Fire+Stations&near=20846+Normandie+Avenue%2C+Torrance%2C+CA%2C+90502&cat=86&tag=&loc=&lat=33.84071207824251&lon=-118.29898773787531>

———. 2017b. LACoFD Station 36 information. <https://locator.lacounty.gov/fire/Location/3055914/los-angeles-county-fire-department---station-36>.

———. 2017c. LAFD Station 79 information. <https://locator.lacounty.gov/fire/Location/3047275/station-no-79---s-vermont-ave>.

Los Angeles County. 2015. General Plan 2035. <http://planning.lacounty.gov/generalplan/generalplan>.

———. 2014. Sheriff's Department Service Areas. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_12-8_Sheriffs_Department_Service_Areas.pdf.

16. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Would the project interfere with regional open space connectivity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) **No Impact.** There is no existing recreational use at the project site. Additionally, the proposed project does not include the development of housing or any residential land uses that could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. The project site has been developed with a variety of commercial and industrial land uses since approximately 1940 and is located in an area where there are numerous industrial uses. Generally, warehousing and other industrial and commercial land uses generate little, if any, activity on neighborhood or regional parks, as these are employment centers where people are typically confined to the site of the business throughout their work hours, with little time to go elsewhere, except to local food services or other errands. As a result, the proposed warehouse project on this site would have no impact involving an increase in the use of existing recreational resources.
- b) **No Impact.** The proposed project does not include an existing or proposed recreational use. The project would not necessitate construction of any additional parks or other recreation facilities outside of the site. As such, there would be no impact.
- c) **No Impact.** The proposed project is in a fully urbanized area, surrounded by residential and commercial uses. There is no regional open space in the West Carson area, where the site is located. As such, it can be anticipated that construction and operation of the proposed project would not directly or indirectly influence the connectivity of any regional open space. There would be no associated impacts.

References:

Los Angeles County. 2015. General Plan 2035. <http://planning.lacounty.gov/generalplan/generalplan>.

17. TRANSPORTATION/TRAFFIC

Would the project:	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program (CMP), including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

a) *Less than Significant Impact with Mitigation Incorporated.*

A. Temporary Construction Impacts

The project is proposed to be constructed in several phases and take approximately one year to complete. The phases of construction include east boundary wall construction, demolition, grading, building construction, paving, and application of architectural coatings. The phases of construction are included below:

- East Boundary Wall Construction - The wall construction activities would require 20 concrete truck deliveries per day and 10 worker trips per day.

- Demolition – The demolition phase is to start after completion of the east boundary wall construction phase. This phase would consist of demolishing the existing structures which include a 22,338-square foot industrial building and 275,000 square feet of paved area. The combined demolition of pavement and building structure requires 1,339 haul truck trips in approximately 20 days. Therefore, the demolition activities would require 134 haul truck trips per day, 15 worker trips per day, and 6 water truck trips per day.
- Grading – The grading phase would occur after completion of the demolition phase. The grading activities would require 15 worker trips per day and 6 water truck trips per day.
- Building Construction – The building construction would occur after the completion of the grading phase and is anticipated to require 150 worker trips per day and 58 vendor trips per day.
- Architectural Coating – The application of architectural coatings would occur after the building construction phase. The architectural coating phase would require 30 worker trips per day.
- Pavement and Site Improvements – The paving and site improvements phase would occur after the completion of the architectural coatings phase. This phase would require 15 worker trips per day.

The County of Los Angeles Code limits construction activities to the hours of 7:00 a.m. to 7:00 p.m. on weekdays; therefore, construction-related traffic would occur only during those time periods, on an intermittent basis, depending on the scope and intensity of the work taking place. A construction period trip generation analysis was conducted for each phase of construction to estimate the a.m. peak hour, p.m. peak hour, and daily trips. It is noted that construction workers often travel outside of the peak commute hours to get to a construction site. Therefore, it was estimated that 15% of construction workers would arrive/depart during the a.m. and p.m. peak hours. Haul/vendor trucks were assumed to occur throughout the day and a Passenger Car Equivalency (PCE) factor of 2.0 was used for all trucks. The maximum construction trip generation is projected to occur during the demolition phase, and would include 49 a.m. peak hour PCE trips, 49 p.m. peak hour PCE trips, and 295 daily PCE trips. These volumes are lower than the volumes that would be generated by the completed and fully occupational project. Peak hour and daily traffic would be less in all other construction phases. The peak construction activity is estimated to generate less a.m. peak hour, p.m. peak hour, and daily PCE trips than are projected for the proposed project when fully operational.

While construction traffic would temporarily affect traffic flow on the surrounding street network, particularly along the truck haul routes, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction program, with less traffic generated in phases following the demolition phases. Because the construction traffic impacts would be temporary, they would not significantly affect the performance of the vehicular transportation network with respect to level of service standards or other metrics related to congestion and travel delay.

B. Long-Term Operational Impacts

Access to the project site is proposed via three project driveways. Driveway 1 would provide full-access ingress/egress movements on Normandie Avenue; driveway 2 would provide full-access ingress/egress movements on Torrance Boulevard; and driveway 3 would align with Kenwood Avenue and provide right-turn ingress/right-turn egress movements on Torrance Boulevard. Trucks would be prohibited from using driveway numbers 2 and 3, pursuant to PDF 3-3.

The County guidelines require a traffic report if a project is expected to generate over 500 trips per day. As shown in Table 17-2, the proposed project would generate approximately 469 passenger car equivalent (PCE) trips per day; thus, a traffic report was not required. However, based upon discussion with County staff, a focused traffic analysis was prepared (Translutions, July 2019--see Appendix M of this IS/MND) that analyzed eight intersections under five different scenarios, as detailed below. The County of Los Angeles, LADOT, and Caltrans use different methodologies to develop forecast traffic volumes and also different level of service (LOS) methodologies to analyze intersection operations. Therefore, the traffic study separated the analyses by jurisdiction and includes traffic assessments for the County of Los Angeles, LADOT, and Caltrans.

Level of service (LOS) is a measure of the quality of operational conditions within a traffic stream and is generally expressed in terms of such measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. Levels range from A to F, with LOS A representing excellent (free-flow) conditions and LOS F representing extreme congestion. The County guidelines use the Intersection Capacity Utilization (ICU) methodology to assess existing and future LOS at study intersections. Based on discussion with County staff, the ICU LOS methodology for shared-left-turn lanes was adjusted by reducing the saturation flow rate with an adjustment factor derived from Transportation Research Record 1194 *Critical Movement Analysis for Shared Left Turn Lanes*. Furthermore, the City of Los Angeles Department of Transportation (LADOT) uses the Critical Movement Analysis (CMA) methodology to assess existing and future LOS at study intersections. Caltrans facilities follow the Highway Capacity Manual 6th Edition methodology, which is based on the delay experienced by vehicles traveling through an intersection to assess existing and future LOS at study intersections. Therefore, for purposes of the LOS analysis conducted for the traffic study, the following methodologies were used at each intersection:

Intersections Analyzed

1. Normandie Avenue and Torrance Boulevard. This intersection is shared by the City of Los Angeles and County of Los Angeles. This intersection was analyzed using the ICU and CMA methodologies.
2. Normandie Avenue and Project Driveway 1. This intersection is in the City of Los Angeles and was analyzed using the ICU and CMA methodologies.
3. Project Driveway 2 and Torrance Boulevard. This intersection is in the County of Los Angeles and was analyzed using the ICU methodology.
4. Project Driveway 3 – Kenwood Avenue and Torrance Boulevard. This intersection is in the County of Los Angeles and was analyzed using the ICU methodology.
5. Vermont Avenue and Torrance Boulevard. This intersection is in the County of Los Angeles and was analyzed using the ICU methodology.
6. Hamilton Avenue and I-110 Southbound Ramps. This intersection is shared by the County of Los Angeles and Caltrans. This intersection was analyzed using the ICU and HCM methodologies.
7. Hamilton Avenue and Torrance Boulevard. This intersection is in the County of Los Angeles and was analyzed using the ICU methodology.
8. Figueroa Street and I-110 Northbound Ramps – This intersection is shared by the City of Carson and Caltrans. This intersection was analyzed using the ICU and HCM methodologies.

Traffic Analysis Scenarios

1. Existing Conditions
2. Existing Plus Project Conditions
3. Existing plus Project plus Mitigation Conditions (if necessary);
4. Existing plus Project plus Cumulative Conditions
5. Existing plus Project plus Cumulative plus Mitigation Conditions (if necessary).

Existing traffic volumes are based on peak hour intersection turn movement counts collected by Counts Unlimited Inc. in February 2018. Vehicle classification counts (e.g., passenger vehicle, 2-axle truck, 3-axle truck, and 4 or more axle truck), were conducted at Normandie Avenue/Torrance Boulevard and Vermont Avenue/Torrance Boulevard. PCE volumes at these intersections were computed using a PCE factor of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for trucks with 4 or more axles. Count sheets are contained in Appendix A in the traffic study. Detailed volume development worksheets are included in Appendix B in the traffic study.

Traffic volumes for existing plus project conditions were developed by adding the project trip assignment to the existing peak hour traffic volumes.

The existing plus project plus cumulative peak hour traffic volumes for intersections within the County were developed by adding trips from other pending development projects (“cumulative projects”) to the existing plus project peak hour traffic volumes. The cumulative projects that are approved and pending and are anticipated to contribute significant traffic to the study area intersections were including in the analysis. The cumulative projects were obtained from the City of Carson, City of Los Angeles, City of Torrance, and County of Los Angeles. Nineteen projects that could add significant traffic to the study intersections were identified and included in the cumulative conditions. Table C in the traffic study summarizes the cumulative projects included in the analysis and Figure 12 in the traffic study illustrates the cumulative project locations. As shown in Table C in the traffic study, the cumulative projects are anticipated to generate 3,989 net a.m. peak hour trips, 5,738 net p.m. peak hour trips, and 75,588 net daily trips. Detailed volume development worksheets are included in Appendix B in the traffic study.

Level of Service Criteria

Various criteria are applied to determine the level of service for unsignalized and signalized intersections. The criteria applied by the County, LADOT and Caltrans are summarized in Table 17-1, below.

Table 17-1 – Intersections and Freeway Facilities Level of Service Criteria

LOS	Description of Drivers' Perception and Traffic Operation	HCM (Delay in Seconds)		ICU/CMA	Basic Freeway Segment - Density (pc/mi/ln)	Merge/Diverge – Density (pc/mi/ln)
		Unsignalized	Signalized			
A	This level is typically assigned when the volume-to-capacity ratio is low and either progression is exceptionally favorable, or the cycle length is very short. If it is due to favorable progression, most vehicles arrive during the green indication and travel through the intersection without stopping.	≤ 10	≤ 10	0.00-0.60	≤ 11	≤ 10

LOS	Description of Drivers' Perception and Traffic Operation	HCM (Delay in Seconds)		ICU/CMA	Basic Freeway Segment - Density (pc/mi/ln)	Merge/Diverge - Density (pc/mi/ln)
		Unsignalized	Signalized			
B	This level is assigned when the volume-to-capacity ratio is low and either progression is highly favorable, or the cycle length is short. More vehicles stop than with LOS A.	> 10 and ≤ 15	> 10 and ≤ 20	0.601-0.70	> 11-18	> 10-20
C	This level is typically assigned when progression is favorable, or the cycle length is moderate. Individual cycle failures (i.e., one or more queued vehicles are not able to depart as a result of insufficient capacity during the cycle) may begin to appear at this level. The number of vehicles stopping is significant, although many vehicles still pass through the intersection without stopping.	> 15 and ≤ 25	> 20 and ≤ 35	0.701-0.80	> 18-26	> 20-28
D	This level is typically assigned when the volume-to-capacity ratio is high and either progression is ineffective, or the cycle length is long. Many vehicles stop and individual cycle failures are noticeable.	> 25 and ≤ 35	> 35 and ≤ 55	0.801-0.90	> 26-35	> 28-35
E	This level is typically assigned when the volume-to-capacity ratio is high, progression is unfavorable, and the cycle length is long. Individual cycle failures are frequent.	> 35 and ≤ 50	> 55 and ≤ 80	0.901-1.00	> 35-45	> 35
F	This level is typically assigned when the volume-to-capacity ratio is very high, progression is very poor, and the cycle length is long. Most cycles fail to clear the queue.	> 50	> 80	>1.00	> 45	Exceeds Capacity

Source: *Highway Capacity Manual 6th Edition, 2010 LA County CMP, LADOT*

Consistent with County requirements, the traffic study analyzed weekday a.m. and p.m. peak hour conditions, with respect to the level of service-based impact significance thresholds defined later herein. The a.m. peak hour is defined as the one hour of highest traffic volumes occurring between 7:00 a.m. and 9:00 a.m. The p.m. peak hour is defined as the one hour of highest traffic volumes occurring between 4:00 and 6:00 p.m.

Project Trip Generation

The proposed project is a warehouse facility for temporary storage and distribution of raw materials or partial or finished products. Therefore, the trip generation for the project is based on trip generation rates from the Institute of Transportation Engineers (10th edition) and on the classification of Land Use 150 - "Warehousing." The proposed warehouse would not be a cold storage facility and is not designed to function as a "high cube warehouse," which would be characterized by different site plan features such as truck bays on at least two sides of the building and significant trailer parking areas to increase truck throughput. The proposed project has a truck loading bay on only one side, limited to 21 docks, and truck/trailer parking would be limited to the small truck court directly south of the loading docks. These project design features will be enforced as project conditions of approval, as defined below.

Project Design Feature 17-1: The warehouse building shall not operate as a cold storage or high cube warehouse facility.

Project Design Feature 17-2: The project shall be constructed in substantial conformance with Figure 4; specifically, truck loading bays shall be limited to the south side of the building and truck/trailer parking shall be limited to the row of parking spaces directly south of the loading docks.

It is noted that the trip generation estimates for the proposed project do not include any discounts for traffic associated with the prior land use and thus may be considered to be conservative. Truck-intensive uses are typically evaluated by converting truck trips to PCEs. Truck trips were converted to PCEs using conversion rates of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+ axle trucks. Table 17-2 shows the trip generation for the project. As shown, the project is anticipated to generate 37 vehicle trips in the a.m. peak hour, 40 trips in the p.m. peak hour, and 357 daily trips, which translate to 50 PCE trips during the a.m. peak hour, 53 PCE trips during the p.m. peak hour, and 469 daily PCE trips.

Table 17-2 – Project Trip Generation

Land Use	Units	Peak Hour						Daily
		AM Peak Hour			PM Peak Hour			
		In	Out	Total	In	Out	Total	
Total Vehicle Rates								
Trip Generation Rates ¹	Per TSF	0.131	0.039	0.170	0.051	0.139	0.190	1.740
PCE Inbound/Outbound Splits		77%	23%	100%	27%	73%	100%	50%/50%
Passenger Car Equivalent Rates Calculations								
Passenger Cars								
Recommended Mix (%) ²		79.57%	79.57%	79.57%	79.57%	79.57%	79.57%	79.57%
PCE Factor ³		1.0	1.0	1.0	1.0	1.0	1.0	1.0
PCE Rates		0.613	0.031	0.135	0.041	0.110	0.151	1.385
2-Axle Trucks								
Recommended Mix (%) ²		3.46%	3.46%	3.46%	3.46%	3.46%	3.46%	3.46%
PCE Factor ³		1.5	1.5	1.5	1.5	1.5	1.5	1.5
PCE Rates		0.007	0.002	0.009	0.003	0.007	0.010	0.090
3-Axle Trucks								
Recommended Mix (%) ²		4.64%	4.64%	4.64%	4.64%	4.64%	4.64%	4.64%
PCE Factor ³		2.0	2.0	2.0	2.0	2.0	2.0	2.0
PCE Rates		0.012	0.004	0.016	0.005	0.013	0.018	0.161
4-Axle Trucks								
Recommended Mix (%) ²		12.33%	12.33%	12.33%	12.33%	12.33%	12.33%	12.33%
PCE Factor ³		3.0	3.0	3.0	3.0	3.0	3.0	3.0
PCE Rates		0.048	0.014	0.063	0.019	0.051	0.070	0.644
Warehouse Net PCE Rate		0.680	0.051	0.223	0.067	0.182	0.249	2.280
Total Project Trip Generation (Trips, By Vehicle Type)								
Warehouse	203.877	TSF						
Passenger Cars			21	7	28	8	23	31
2-Axle Trucks			1	1	2	1	1	2
3-Axle Trucks			1	1	2	0	2	2
4+ Axle Trucks			4	1	5	1	4	5
Total Vehicles			27	10	37	10	30	40

						</		

Land Use	Units	Peak Hour						Daily
		AM Peak Hour			PM Peak Hour			
		In	Out	Total	In	Out	Total	
Total Project Trip Generation (Passenger Car Equivalent Trips, By Vehicle Type)								
Passenger Cars		21	7	28	8	23	31	283
Truck PCE								
2-Axle Trucks		1	2	3	1	2	3	20
3-Axle Trucks		2	2	4	0	4	4	34
4+ Axle Trucks		12	3	15	3	12	15	132
Total Truck PCE		15	7	22	4	18	22	186
Total PCE		36	14	50	12	41	53	469

Source: Translutions, July 2019

Notes:

Per TSF = Per Thousand Square Feet

¹ Rates based on Land Use 150 - "Warehousing" from Institute of Transportation Engineers (ITE) Trip Generation (10th Ed.).

² Recommended Truck Mix Percentages per City of Fontana Truck Trip Generation Study for Heavy Warehouse uses, August 2003

³ Recommended PCE Factor per San Bernardino County CMP, 2016 Update

Project Trip Distribution

Trip distribution patterns for project trips were developed separately for autos and trucks based on discussion with County staff and the location of local and regional destinations. Truck trips were routed to the nearest freeway. Automobile trips were routed based on logical destinations and residential/commercial uses in the area. It is forecast that a large majority (70 percent) of the automobile trips would originate from and return to the east, along Torrance Boulevard, while a larger percentage of truck trips (85 percent) would originate from and return to the east, along Torrance Boulevard to I-110. It is noted that all of the trucks generated by the project would arrive and depart the project site from the Normandie Avenue driveway. Trucks would not be permitted to enter or leave the site from either Torrance Boulevard driveway; this is to be enforced as a PDF, noted in Section 3. Air Quality as PDF 3-3. The project trip generation was applied to the trip distribution patterns for the proposed project to develop trip assignments for new project trips. Figure 4 in the traffic study shows the trip distribution for project automobile trips, and Figure 5 in the traffic study shows the automobile trip assignment at the study area intersections. Figure 6 in the traffic study shows the trip distribution of truck trips, and Figure 7 shows the assignment of truck trips to each of the study area intersections. , Figure 8 in the traffic study shows the total truck trip assignment (in PCEs) at the study intersections.

Impact Significance Thresholds

Project-related congestion impacts at signalized intersections were determined on the basis of the amount of traffic the project would add to the study area intersections and the nearest segment and ramps of the I-110 Freeway, compared to the applicable significance thresholds described below.

The City and County of Los Angeles use significant impact thresholds to determine project impacts, which considers an impact significant if the project related increase in the volume/capacity (v/c) ratio exceeds the following:

- LOS C project v/c increase $\geq 4\%$ (0.04);
- LOS D project v/c increase $\geq 2\%$ (0.02); and
- LOS E/F project v/c increase $\geq 1\%$ (0.01).

The County's guidelines require mitigation of project traffic impacts to a level of insignificance whenever the pre-project LOS with the addition of traffic generated by the project exceeds the thresholds described above. The City of Carson identifies significant impacts if the "with project" LOS is LOS E or LOS F and the project increases the v/c by 0.02 or higher. Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities. Caltrans guidelines also state that if a facility is operating at less than the appropriate target LOS, the existing Measure of Effectiveness (MOE) should be maintained. Because Caltrans does not have any impact or CEQA significance thresholds, significance of project impacts at Caltrans facilities have been identified based on the CMP and County thresholds listed above. To help plan future improvements, Caltrans routinely comments on projects and requests improvements identified at intersections operating at LOS E or F to restore operations to LOS D or better, regardless of the significance of the impact generated by an individual project. For freeway segments and merge-diverge areas, the CMP standard of LOS E has been applied.

Intersection Operations

Permitted/Protected Intersection Phasing

As part of a potential mitigation program, permitted/protected (or protected/permitted) left turn phasing was studied as an alternate to the existing protected left turn phasing in place at the affected study intersections. The permitted/protected phasing has the potential to improve traffic flow by accommodating more left turn vehicles through the intersection. Permitted plus protected phasing allows northbound vehicles, for example, to turn left both during the time when the northbound green left arrow is showing and during the portion of the signal phase when the northbound green ball is on (although the northbound left turn vehicles need to yield to the southbound through traffic at this time).

Under the traditional ICU capacity calculation methodology, there is no option to evaluate permitted plus protected phasing. Therefore, based on discussion with County staff, a methodology was developed to measure the number of left-turning vehicles that might be processed during the green ball portion of the signal phase. This was tested by calculating the 95th percentile queues at the left turn lanes under both a traditional protected signal and the suggested permitted/protected signal phasing using the Highway Capacity Manual signalized intersection calculation methodology. In all cases, the overall seconds of delay at the intersection decreased under the permitted/protected signal phasing and the left turn queues decreased on those approaches controlled with the permitted/protected phase. The change in queue length was calculated to identify the number of additional vehicles that were processed as a result of the permitted/protected phasing on the affected movement. The number of left turn vehicles still being processed during the green arrow phase of the signal cycle was replaced in the ICU calculation to measure the effectiveness of the change to permitted/protected signal phasing. This methodology was reviewed and approved by Los Angeles County staff.

Effective Left Turn Lane

The intersection of Hamilton Avenue/I-110 Southbound Ramps is currently striped with two southbound lanes – one southbound through/left turn lane and one southbound through lane. However, the southbound volumes during both peak periods are predominantly left turn movements onto the freeway ramp. In the morning peak hour, the left turn volumes outweigh the through volumes by a factor of 3:1 while the afternoon peak hour indicates a higher factor of 5:1. Translutions staff observed the operations for the southbound traffic during the p.m. peak hour and only one car was observed to travel southbound through from the shared left-through lane. Therefore, the actual operation of the southbound lanes is one left turn lane and one through lane. The capacity calculations in this analysis for all scenarios assume one effective southbound left turn lane and one southbound through lane.

Roadway Improvement

As part of a Caltrans project (EA #29370), the intersection of Hamilton Avenue/I-110 Southbound Ramps will be improved to include: installation of a new traffic signal and widening of the I-110 Southbound off-ramp to allow two left-turn lanes and a new free-flow right-turn lane. This project is funded and currently under construction; for the purposes of this analysis, implementation of the Hamilton Avenue/I-110 Southbound Ramps improvement is assumed to occur in the background concurrent with the Project.

Impact Analysis Under Los Angeles County Standards

Existing Conditions Level of Service Analysis

An intersection LOS analysis was conducted for existing conditions to determine current circulation system performance. Figure 13 in the traffic study shows the lane geometrics and stop controls at the study intersections. The existing traffic volumes at study intersections are illustrated in Figure 14 of the traffic study. Detailed volume development worksheets are included in Appendix B of the traffic study. The existing LOS for the study area intersections are summarized in Table 17-3, below. LOS calculation worksheets are contained in Appendix C of the traffic study. As shown therein, the intersection of Hamilton Avenue and I-110 Southbound Ramps is operating at unsatisfactory LOS in the a.m. and p.m. peak hours.

Existing Plus Project Level of Service Analysis

An intersection level of service analysis was conducted using the ICU methodology for existing plus project conditions to determine circulation system performance. Existing plus project traffic volumes at study intersections are shown in Figure 15 in the traffic study. The existing plus project levels of service for the study area intersections are summarized in Table 17-3 (which recreates Table D of the traffic study). Level of service calculation worksheets are contained in Appendix C in the traffic study. As shown in Table 17-3 (Table D of the traffic study), the project's added traffic would not exceed the threshold of significance at any of the study area intersections. The intersection of Hamilton Avenue and I-110 Southbound Ramps is projected to continue to operate at unsatisfactory levels of service in the a.m. and p.m. peak hours. The project does not create this deficiency, since it also operates at unsatisfactory LOS under without project conditions. The addition of project trips maintains the without project LOS. The project has a less than significant impact at this location based on the thresholds included in County guidelines.

Table 17-3: Existing and Existing Plus Project Levels of Service (LA County)

Intersection	LOS Standard	Control	Without Project						Plus Project						Increase in V/C		Project Impact
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM Peak Hour	PM Peak Hour	
			ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS			
1. Normandie Avenue/ Torrance Boulevard	E	Signal	1.0090	-	F	0.9172		E	1.0119	-	F	0.9209	-	E	0.0029	0.0037	NO
2. Normandie Avenue/ Driveway 1	E	TWSC							0.4675	-	A	0.4457	-	A	-	-	NO
3. Driveway 2/Torrance Boulevard	E	TWSC							0.6535	-	B	0.6403	-	B	-	-	NO
4. Driveway 3-Kenwood Ave/Torrance Blvd	E	TWSC	0.6331	-	B	0.6779	-	B	0.6432	-	B	0.6884	-	B	0.0101	0.0105	NO
5. Vermont Avenue/ Torrance Boulevard	E	Signal	0.8494	-	D	0.9219	-	E	0.8582	-	D	0.9316	-	E	0.0088	0.0097	NO
6. Hamilton Avenue/ I-110 SB Ramps	D	AWSC	0.6457	-	B	0.6250	-	B	0.6498	-	B	0.6263	-	B	0.0041	0.0013	NO
7. Hamilton Avenue/ Torrance Boulevard	E	Signal	0.7572	-	C	0.6344	-	B	0.7694	-	C	0.6416	-	B	0.0122	0.0072	NO
8. Figueroa Street/ I-110 NB Ramps	D	Signal	0.7347	-	C	0.7082	-	C	0.7364	-	C	0.7134	-	C	0.0017	0.0052	NO

Notes:

LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control

* = Exceeds Level of Service Standard

Existing Plus Project Plus Cumulative Intersection Levels of Service

An intersection level of service analysis was conducted using the ICU methodology for existing plus project plus cumulative conditions to determine circulation system performance. Existing plus project plus cumulative traffic volumes at study intersections are shown in Figure 16 in the traffic study. The existing plus project plus cumulative levels of service for the study area intersections are summarized in Table 17-4 (which recreates Table E of the traffic study). Level of service calculation worksheets are contained in Appendix C in the traffic study. As shown in Table 17-4 (Table E of the traffic study), the intersections of Normandie Avenue and Torrance Boulevard, Vermont Avenue and Torrance Boulevard, and Hamilton Avenue and Torrance Boulevard are projected to exceed the thresholds included in County guidelines under the existing plus project plus cumulative scenario. As stated earlier, the Hamilton Avenue/I-110 Southbound Ramps intersection improvement is part of a larger fully funded Caltrans project (EA #29370) that is currently under construction and anticipated to be completed concurrent with the Project. Once completed, the cumulative impacts at this intersection would be fully mitigated.

Table 17-4: Existing and Existing Plus Project plus Cumulative Levels of Service (LA County)

Intersection	Control	Existing Conditions				Existing Plus Project Plus Cumulative Conditions				Increase in V/C		Cumulative Impact
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour	PM Peak Hour	
		ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	Hour	Hour	
1. Normandie Ave/Torrance Blvd	Signal	1.0090	F	0.9172	E	1.0419	F	0.9816	E	0.0329	0.0644	Yes
2. Normandie Ave/Driveway1	TWSC	<i>Future Intersection</i>				0.4787	A	0.4572	A	-	-	No
3. Driveway 2/Torrance Boulevard	TWSC	<i>Future Intersection</i>				0.6849	B	0.6834	B	-	-	No
4. Driveway 3-Kenwood Avenue/Torrance Boulevard	TWSC	0.6331	B	0.6779	B	0.6582	B	0.7330	C	0.0251	0.0551	No
5. Vermont Ave/Torrance Blvd	Signal	0.8494	D	0.9219	E	0.8735	D	0.9747	E	0.0241	0.0528	Yes
6. Hamilton Ave/I-110 SB Ramps	Signal	0.6457	B	0.6250	B	0.6935	B	0.6882	B	0.0478	0.0632	No
7. Hamilton Ave/Torrance Blvd	Signal	0.7572	C	0.6344	B	0.8069	D	0.6994	B	0.0497	0.0650	Yes
8. Figueroa St/I-110 NB Ramps	Signal	0.7347	C	0.7082	C	0.8167	D	0.8681	D	0.0820	0.1599	^

Notes:

LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control

* = Exceeds Level of Service Standard

^ = See the Impact Analysis Under City of Carson Standards section below

Existing Plus Project Plus Cumulative Plus Mitigation Conditions

Los Angeles County traffic impact analysis procedures indicate that when the LOS results suggest that the combination of all cumulative projects plus project traffic would exceed the County's LOS target levels, then improvements should be identified that would achieve the County's performance standards. The project would then be responsible for participating in the cost of that improvement based on a "Fair Share" cost allocation that is measured by calculating the project's proportional share of the anticipated growth in traffic at that location. Fair Share fees paid by a project would be allocated to a specific fund intended to implement improvements at the identified location. It should be noted that the improvements required to offset impacts from cumulative projects back to existing conditions are infeasible. Feasible improvements to mitigate the project's contribution to the cumulative impacts to less than significant levels have been identified and are explained in Mitigation Measure 17-1, below.

Mitigation Measure 17-1: The project shall pay fair share fees to help fund the following intersection improvements to mitigate the project's increase in v/c ratios for Existing+Project+Cumulative conditions:

- a) **Normandie Avenue/Torrance Boulevard** – Widen into the project site on the east side of Normandie Avenue, south of the intersection to add a northbound right-turn lane; widen the south side of Torrance Boulevard, west of the intersection to add an eastbound right-turn lane; and widen into the project site on the south side of Torrance Boulevard, east of the intersection to accommodate an additional westbound right turn lane. These improvements will require right-of-way dedication from the project. Add permitted/protected phasing to the westbound and southbound approaches. These improvements will reduce cumulative impacts to less than significant. These improvements are anticipated to cost approximately \$650,000, of which the project's fair share is 9.57%, or approximately \$62,200.
- b) **Vermont Avenue/Torrance Boulevard** – Widen the south side of Torrance Boulevard, west of the intersection, to accommodate a new eastbound right-turn lane and add permitted/protected phasing to the northbound and southbound approaches. These improvements will reduce cumulative impacts to less than significant. These improvements are anticipated to cost approximately \$766,000, of which the project's fair share is 16.81%, or approximately \$128,800.
- c) **Hamilton Avenue/Torrance Boulevard** – Add permitted/protected phasing to the eastbound approach. Therefore, this improvement will reduce cumulative impacts to less than significant. The cost estimates for permitted/protected phasing is \$25,000 for the eastbound approach. The project's fair share at this intersection is 13.603%, or \$3,400.

Appendix D-2 of the traffic study details the improvement cost estimates and the project's fair share contribution to mitigate cumulative impacts. The project fair share is calculated to be \$194,400. As shown in Appendix D-2 of the traffic study, approximately 6,625 square feet of land area will be dedicated from the project site to accommodate the improvements at Normandie Avenue/Torrance Boulevard. The estimated value of this dedication is \$265,000, which would be applied as a credit toward the project's fair share contribution and fees.

Table 17-5 (which recreates Table F of the traffic study) shows the resulting levels of service for existing plus project plus cumulative conditions with the improvements identified above.

Table 17-5: Existing and Existing Plus Project Plus Cumulative with Improvements Levels of Service (LA County)

Intersection	LOS Standard	Control	Existing Conditions						Existing Plus Project Plus Cumulative With Improvements						Increase in V/C		Cumulative Impacts
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM Peak Hour	PM Peak Hour	
			ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS			
1. Normandie Ave/ Torrance Blvd	E	Signal	1.0090	-	F	0.9172	-	E	1.0026	-	F	0.9106	-	E	-0.0064	-0.0066	No
5. Vermont Ave/ Torrance Blvd	E	Signal	0.8494	-	D	0.9219	-	E	0.8598	-	D	0.9122	-	E	0.0104	-0.0097	No
7. Hamilton Ave/ Torrance Blvd	E	Signal	0.7572	-	C	0.6344	-	B	0.7700	-	C	0.6953	-	B	0.0128	0.0609	No

Impact Analysis Under LADOT Standards

The intersections of Normandie Avenue and Torrance Boulevard and Normandie Avenue and Driveway 1 are shared by the City of Los Angeles and County of Los Angeles. The LADOT guidelines use the CMA method of intersection capacity to analyze signalized intersections. For unsignalized intersections, the guidelines state “unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal”. Therefore, a peak hour warrant was conducted at Normandie Avenue and Driveway 1 using the 2013 California Manual of Uniform Traffic Control Devices (Warrant 3 – Peak Hour). The peak hour warrant is included in Appendix D in the traffic study and shows Normandie Avenue and Driveway 1 does not meet the warrant for a traffic signal.

The following discusses the City of Los Angeles traffic analysis and includes the forecast traffic volume methodology and levels of service analysis at the intersection of Normandie Avenue and Torrance Boulevard.

Analysis Scenarios

1. Existing Conditions;
2. Existing plus Project Conditions;
3. Cumulative Conditions; and
4. Cumulative plus Project Conditions

Existing traffic volumes are based on peak hour intersection turn movement counts collected by Counts Unlimited Inc. in February 2018. Vehicle classification counts (e.g., passenger vehicle, 2-axle truck, 3-axle truck, and 4 or more axle truck), were conducted at Normandie Avenue/Torrance Boulevard. PCE volumes at this intersection was computed using a PCE factor of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for trucks with 4 or more axles. Count sheets are contained in Appendix A. Detailed volume development worksheets are included in Appendix B in the traffic study.

Traffic volumes for *existing plus project* conditions were developed by adding the project trip assignment to the existing peak hour traffic volumes. The existing plus project traffic volumes are included in Appendix B in the traffic study.

The *cumulative peak hour* traffic volumes for the intersection of Normandie Avenue and Torrance Boulevard were developed by applying a per annum growth rate of 1 percent to the existing volumes for two years and adding cumulative project trips. The cumulative projects are listed in previously referenced Table C in the traffic study and are shown in previously referenced Figure 12 in the traffic study. The cumulative peak hour traffic volumes are included in Appendix B in the traffic study.

The *cumulative plus project* peak hour traffic volumes for the intersection of Normandie Avenue and Torrance Boulevard were developed by adding the project trip assignment to the cumulative traffic volumes and included in Appendix B in the traffic study.

Existing Plus Project Impacts

An intersection level of service analysis was conducted using the CMA methodology for existing plus project conditions to determine circulation system performance. The existing plus project traffic volumes are included in Appendix B in the traffic study. The existing plus project levels of service for the study area intersections are summarized in Table 17-6. Level of service calculation worksheets are contained in Appendix C in the traffic study. As shown in Table 17-6, the intersection of Normandie Avenue and Torrance Boulevard is not projected to have a significant project impact in the a.m. or p.m. peak hours.

Table 17-6 – Existing and Existing Plus Project Levels of Service (LADOT)

Intersection	LOS Standard	Control	Without Project				Plus Project				Increase in V/C		Significant Impact
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour	PM Peak Hour	
			CMA	LOS	CMA	LOS	CMA	LOS	CMA	LOS			
1. Normandie Avenue/ Torrance Boulevard	E	Signal	1.0413	F	0.9315	E	1.0420	F	0.9358	E	0.0007	0.0044	No

Notes: LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control
 * = Exceeds Level of Service Standard

Cumulative Plus Project Impacts

An intersection level of service analysis was conducted using the CMA methodology for cumulative plus project conditions to determine circulation system performance. The cumulative plus project traffic volumes are included in Appendix B in the traffic study. The cumulative plus project levels of service for the study area intersection is summarized in Table 17-7. Level of service calculation worksheets are contained in Appendix C. As shown in Table I, the intersection of Normandie Avenue and Torrance Boulevard is not projected to have a significant project impact under cumulative conditions in the a.m. or p.m. peak hours.

Table 17-7 – Cumulative and Cumulative Plus Project Levels of Service (LADOT)

Intersection	LOS Standard	Control	Without Project				Plus Project				Increase in V/C		Significant Impact
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour	PM Peak Hour	
			CMA	LOS	CMA	LOS	CMA	LOS	CMA	LOS			
1. Normandie Avenue/ Torrance Boulevard	E	Signal	1.0965	F	1.0209	F*	1.0973	F	1.0253	F	0.0007	0.0044	NO

Notes: LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control
 * = Exceeds Level of Service Standard

Impact Analysis Under City of Carson Standards

The signalized intersection of Figueroa Street and I-110 Northbound Ramps is shared by the City of Carson and Caltrans. The City of Carson uses the ICU method of intersection capacity to analyze level of service impacts. Accordingly, and based on the City of Carson impact criteria, project-related impacts were analyzed at this location for the following analysis scenarios:

- Existing Conditions
- Existing plus Project Conditions
- Cumulative Conditions
- Cumulative plus Project Conditions

As shown in Table 17-8, the project's traffic would not result in a significant impact in the a.m. or p.m. peak hours, for Existing plus Project Conditions.

Table 17-8: Existing and Existing Plus Project Levels of Service (Carson)

Intersection	LOS Standard	Control	Without Project						Plus Project						Increase in V/C		Project Impact
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM Peak Hour	PM Peak Hour	
			ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS			
8. Figueroa St/ I-110 NB Ramps	D	Signal	0.7474	-	C	0.7203	-	C	0.7491	-	C	0.7255	-	C	0.0017	0.0052	NO

Notes:

LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control

* = Exceeds Level of Service Standard

As shown in Table 17-9, the projects traffic would not result in a significant impact in the a.m. or p.m. peak hours, for Cumulative plus Project Conditions.

Table 17-9: Cumulative and Cumulative Plus Project Levels of Service (Carson)

Intersection	LOS Standard	Control	Without Project						Plus Project						Increase in V/C		Cumulative Impact
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM Peak Hour	PM Peak Hour	
			ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS	ICU	Delay	LOS			
8. Figueroa St/ I-110 NB Ramps	D	Signal	0.8405	-	D	0.8874	-	D	0.8423	-	D	0.8926	-	D	0.0018	0.0052	NO

Supplemental Analysis of Higher Proportion of Nighttime Trucks, Versus Daytime

As stated in the Traffic Impact Study (TIS) prepared for this Initial Study (see Appendix M), the Project is estimated to generate approximately 74 daily truck trips and 283 daily passenger vehicle trips. It is anticipated that approximately 2/3 of the 74 daily truck trips (approximately 49 trips split evenly between inbound and outbound trips) would occur during the day and 1/3 overnight (approximately 25 trips, split evenly between inbound and outbound trips). To provide a conservative noise analysis, Section 13 of this Initial Study analyzes a scenario in which 2/3 of the daily truck trips occur during nighttime hours (7:00 PM to 7:00 AM). To analyze the potential traffic impacts associated with this more conservative nighttime noise analysis, Translutions, Inc. (Translutions) assessed whether any new or increased project related transportation impacts would occur if the project generated 2/3 of the truck trips between the hours of 7:00 PM and 7:00 AM. That supplemental analysis is also provided in Appendix M of this Initial Study.

The TIS for the project (assuming 2/3 of the truck trips during the daytime) forecast 37 project trips during the a.m. peak hour and 40 project trips during the p.m. peak hour. The supplemental traffic analysis determined that fewer peak hour trips would be generated if 2/3 of the truck trips occur during the nighttime. Translutions also analyzed hourly traffic volumes on Normandie Avenue and Torrance Boulevard and determined that the residual capacity of the streets around the project is substantially higher during the off-peak hours than during the peak hours.

Based on these two findings, the supplemental traffic analysis concluded that under a scenario in which 2/3 of the daily truck trips occur during nighttime hours (7:00 PM to 7:00 AM), the project-related traffic impacts would be less than those analyzed in the TIS, and therefore would be less than significant.

Freeway Impact Analysis Under Caltrans and CMP Standards

The intersections of Hamilton Avenue and I-110 SB Ramps and Figueroa Street and I-110 NB Ramps are shared by the County of Los Angeles and Caltrans. Therefore, an analysis at these locations using the Caltrans methodologies was conducted. The following discusses the Caltrans traffic analysis and includes the forecast traffic volume methodology and levels of service analyses. Impact significance determinations are based on the Los Angeles County CMP threshold described earlier.

Based on Caltrans guidelines, traffic conditions were analyzed for the following scenarios:

1. Existing Conditions;
2. Existing plus Project Conditions;
3. 2040 Conditions; and
4. 2040 plus Project Conditions.

Existing traffic volumes are based on peak hour intersection turn movement counts collected by National Data and Surveying Services in November 2016. A per annum growth rate of one percent was applied to the 2016 counts for two years. Counts sheets are contained in Appendix A in the traffic study. The existing peak hour traffic volumes are included in Appendix B in the traffic study.

Traffic volumes for existing plus project conditions were developed by adding the project trip assignment to the existing peak hour traffic volumes. The existing plus project traffic volumes are included in Appendix B in the traffic study.

The 2040 peak hour traffic volumes were developed by applying a per annum growth rate of one percent to the existing volumes for 22 years and adding cumulative project trips. The 2040 peak hour traffic volumes are included in Appendix B in the traffic study.

The 2040 plus project peak hour traffic volumes were developed by adding the project trip assignment to the 2040 traffic volumes. The 2040 plus project peak hour traffic volumes are included in Appendix B in the traffic study.

Existing Plus Project Level of Service Impacts

An intersection level of service analysis was conducted using the HCM methodology for existing plus project conditions to determine circulation system performance. Existing plus project traffic volumes at study intersections are shown in Appendix B in the traffic study. The existing plus project levels of service for the study area intersections are summarized in Table 17-10. Level of service calculation worksheets are contained in Appendix C in the traffic study. As shown in Table 17-10, the intersection of Hamilton Avenue and I-110 SB Ramps is projected to continue to operate at unsatisfactory levels of service in the a.m. and p.m. peak hours. The project does not create this deficiency, since it also operates at unsatisfactory LOS under without project conditions. The addition of project trips would increase the v/c ratio by less than two percent and would not change the intersection level of service. The project has a less than significant impact at this location based on Caltrans and CMP guidelines.

Please note that Caltrans is currently constructing improvements at the Hamilton Avenue/I-110 SB Ramps, including installation of a traffic sign and widening the westbound approach to include two westbound left-turn lanes and one westbound right-turn lane. These modifications would result in an improvement in the operating efficiency to LOS D.

Table 17-10 – Existing and Existing Plus Project Levels of Service (Caltrans)

Intersection	LOS Standard	Control	Without Project				Plus Project			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Hamilton Avenue/ I-110 SB Ramps	D	AWSC	>100	F*	>100	F*	>100	F*	>100	F
2. Figueroa Street/ I-110 NB Ramps	D	Signal	42.800	D	38.300	D	44.400	D	39.000	D

Notes:
LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control
* = Exceeds Level of Service Standard

2040 Plus Project Level of Service Impacts

An intersection level of service analysis was conducted using the HCM methodology for 2040 plus project conditions to determine circulation system performance. 2040 plus project traffic volumes at study intersections are shown in Appendix B of the Traffic Study. The 2040 plus project levels of service for the study area intersection is summarized in Table 17-11. Level of service calculation worksheets are contained in Appendix C. As shown in Table 17-11, the intersections of Hamilton Avenue and I-110 SB Ramps and Figueroa Street and I-110 NB Ramps are projected to continue to operate at unsatisfactory levels of service in the a.m. and p.m. peak hours. The project does not create these deficiencies, since they also operate at unsatisfactory LOS under without project conditions. The addition of project trips would increase the v/c ratio by less than two percent and would not change the intersection level of service. The project has a less than significant impact at these locations based on Caltrans and CMP guidelines, and no mitigation is required.

Table 17-11 – 2040 and 2040 Plus Project Intersection Levels of Service (Caltrans)

Intersection	LOS Standard	Control	Without Project				Plus Project			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Hamilton Avenue/ I-110 SB Ramps	D	AWSC	>100	F*	>100	F*	>100	F*	>100	F*
2. Figueroa Street/ I-110 NB Ramps	D	Signal	>100	F*	>100	F*	>100	F*	>100	F*

Notes:
LOS = Level of Service, TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control
* = Exceeds Level of Service Standard

Freeway Merge/Diverge Analysis

Based on discussion with Caltrans, a freeway merge-diverge analysis was conducted at the northbound I-110 Figueroa Street ramps and southbound I-110 Hamilton Avenue ramps. The analysis is consistent with HCM 6th Edition methodology, which uses vehicle density (passenger cars per mile per lane) as the LOS criteria for merge-diverge segments.

Existing traffic volumes are based on data from Caltrans and conservation of flow was applied to the freeway facilities to obtain consistent traffic volumes. 2040 traffic volumes were developed by applying a per annum growth rate of one percent to the existing volumes. Detailed volume development worksheets are included in Appendix B of the traffic study.

Existing Plus Project

A level of service analysis was conducted for the study area freeway facilities under existing plus project conditions to determine current circulation system performance. Detailed volume development worksheets are included in Appendix B in the traffic study. The existing plus project levels of service for the study area freeway facilities are summarized in Table P in the traffic study. Level of service calculation worksheets are contained in Appendix C in the traffic study. As shown in Table P of the traffic study, the following are operating at unsatisfactory levels of service:

- I-110 Northbound: South of Figueroa Street Off-Ramp (a.m. peak hour);
- I-110 Northbound: Figueroa Street Off-Ramp (a.m. peak hour);
- I-110 Northbound: Figueroa Street On-Ramp (a.m. peak hour);
- I-110 Northbound: North of Figueroa Street On-Ramp (a.m. peak hour);
- I-110 Southbound: North of Hamilton Avenue Off-Ramp (p.m. peak hour);
- I-110 Southbound: Hamilton Avenue Off-Ramp (p.m. peak hour);
- I-110 Southbound: Between Hamilton Avenue Ramps (p.m. peak hour);
- I-110 Southbound: Hamilton Avenue On-Ramp (p.m. peak hour); and
- I-110 Southbound: South of Hamilton Avenue On-Ramp (p.m. peak hour).

The project related increase in density would be less than significant and, in some cases, would not change the pre-project condition. Based on the LA County CMP, the project does not add 50 or more trips to any on/off ramp intersection or 150 or more trips to any mainline segment during the a.m. or p.m. peak hours. Therefore, the project has a less than significant merge/diverge impact at both freeway locations.

2040 Plus Project

A level of service analysis was conducted for the study area freeway facilities under 2040 plus project conditions to determine current circulation system performance. Detailed volume development worksheets are included in Appendix B in the traffic study. The 2040 plus project levels of service for the study area freeway facilities are summarized in Table Q in the traffic study. Level of service calculation worksheets are contained in Appendix C in the traffic study. As shown in Table Q in the traffic study, the following are projected to operate at unsatisfactory levels of service:

- I-110 Northbound: South of Figueroa Street Off-Ramp (a.m. and p.m. peak hours);
- I-110 Northbound: Figueroa Street Off-Ramp (a.m. peak hour);
- I-110 Northbound: Figueroa Street On-Ramp (a.m. and p.m. peak hours);
- I-110 Northbound: North of Figueroa Street On-Ramp (a.m. and p.m. peak hours);
- I-110 Southbound: North of Hamilton Avenue Off-Ramp (a.m. and p.m. peak hours);
- I-110 Southbound: Hamilton Avenue Off-Ramp (a.m. and p.m. peak hours);
- I-110 Southbound: Between Hamilton Avenue Ramps (p.m. peak hour);
- I-110 Southbound: Hamilton Avenue On-Ramp (p.m. peak hour); and
- I-110 Southbound: South of Hamilton Avenue On-Ramp (p.m. peak hour).

It should be noted that with the addition of project traffic, the project related increase in density is less than significant and, in some cases, would not change the pre-project condition. Based on the LA County CMP, the project would not add 50 or more trips to any on/off ramp intersection or 150 or more trips to any mainline segment during the a.m. or p.m. peak hours. Therefore, the project would have a less than significant merge/diverge impact at the two freeway locations in projected Year 2040 conditions.

Long Range Cumulative Mainline Impacts

The project's share of projected future 2040 traffic added to each of the freeway mainline segments was calculated. As shown in Table R in the traffic study, the project would contribute less than 1% of the total traffic growth between existing and year 2040 at all mainline segments. Based on the LA County CMP, the project would add less than 150 trips to any mainline segment during the a.m. or p.m. peak hours. Therefore, the project would have a less than significant impact at both freeway mainline locations.

Queuing Analysis

A queuing analysis was conducted at Caltrans facilities at the I-110 on/off ramps at Hamilton Avenue and Figueroa Street to determine if adequate storage is available. As shown in Table S in the traffic study, the project would not substantially increase queues at either location and project mitigation would not be required.

Performance Standards for Transit and Non-Motorized Modes of Travel

In addition to the guidelines for LOS for vehicular traffic, the California Complete Streets Act of 2008 requires that a general plan demonstrate how a jurisdiction will provide for the routine accommodation of all users of a road or street, including pedestrians, bicyclists, users. The Los Angeles County General Plan 2035 Mobility Element addresses this requirement with policies and programs that consider all modes of

travel, with the goal of making streets safer, accessible, and more convenient on which to walk, ride a bicycle, or access public transit.

Five bus routes operate within the vicinity of the proposed project, run by either Los Angeles County Metropolitan Transportation Authority (Metro), the City of Torrance, or the City of Gardena. Near the project site, routes run along Normandie Avenue, Torrance Boulevard, and Vermont Avenue. The nearest bus stops to the proposed project are located directly north and west of the project site at the intersection of Normandie Avenue and Torrance Boulevard. The proposed project would have no effect on these bus routes or stops, except to whatever extent future project employees or visitors may choose to board or leave a bus at either stop and travel along the existing routes. This would not adversely affect the level of bus transit service.

The nearest bike transit facilities are the non-contiguous bike lanes along Vermont Avenue, east of the site. According to the County of Los Angeles Bicycle Master Plan (2012), this is a Class II facility; defined by pavement striping and signage.⁵⁸ In addition, according to the plan, no other facilities are proposed within the vicinity of the proposed project.⁵⁹ Project implementation would not impede or restrict access to this bike route. The project will comply with the provisions of Section 22.112.100 (Bicycle Parking Spaces and Related Facilities) of the Los Angeles County Zoning Code, which mandates one short-term bicycle parking space for every 20,000 square feet of development and one long-term parking space for every 10,000 square feet of development.⁶⁰ The proposed plan includes 11 short-term bicycle spaces and 21 long-term spaces within the parking area along Torrance Boulevard, plus showers and changing facilities for employees who commute by bicycle that would be installed by future tenants.

Pedestrian facilities in the project area include the network of continuous sidewalks on both sides of Normandie Avenue and Torrance Boulevard as well as on many of the other smaller roadways in the vicinity. The existing sidewalks that front the project site would be retained and no impacts would occur to pedestrian access as a result of project implementation.

The proposed project would not alter the existing routes and facilities offered as alternatives to vehicular travel. The site is accessible and would remain accessible via bus or bike travel and the existing networks of sidewalks would remain in place. Therefore, the project would have no impact on the effectiveness or performance measures set forth for alternative or non-motorized transportation.

- b) ***Less Than Significant Impact.*** Metro adopted its most recent CMP in 2010. The CMP provides guidelines for conducting impact analyses on specific intersections and freeway segments identified for long-term traffic monitoring. Detailed analysis must be conducted at any monitoring intersection where the project would add more than 50 trips in a peak hour and at any monitoring freeway segment where the project would add more than 150 trips in a peak hour. As discussed in the preceding response, the proposed project would generate fewer than 50 trips in either peak hour and less than 150 trips per day to the two I-110 Freeway locations included in the traffic impact study area; therefore, it fails to meet the minimum trip requirements for further analysis for CMP network locations. The project would not conflict with the CMP LOS standards and would therefore have a less-than-significant impact.
- c) ***No Impact.*** The proposed project does not include any design features that would interfere with air traffic. The project would result in a single-level warehouse structure, generally less than 50 feet high.

⁵⁸ County of Los Angeles Department of Public Works, Master Bike Plan 2012. Accessed April 10, 2018. <https://dpw.lacounty.gov/pdd/bike/docs/bmp/FINAL.%20Bicycle%20Master%20Plan.pdf>

⁵⁹ *Ibid.*

⁶⁰ Title 22, Los Angeles County Zoning Code. Accessed June Title 22, 25, 2018. <http://file.lacounty.gov/SDSInter/bos/supdocs/97129.pdf>

Project implementation does not include any towers, such as a cellular tower that would potentially affect air traffic. The project site is not located in an area where development is regulated by an airport land use plan; the nearest airport is the Torrance Airport - Zamperini Field, which is a general aviation airport located 5.5 miles southwest of the project site. Therefore, the project would have no impact in relation to this issue.

- d) **No Impact.** Access to the project site would be provided via three project driveways. Driveway 1 would provide full-access ingress/egress movements on Normandie Avenue; Driveway 2 would provide full-access ingress/egress movements on Torrance Boulevard; and Driveway 3 would provide right-turn ingress/right-turn egress movements on Torrance Boulevard. Design of driveways would be based on County Code, which sets the standard for such design. Project driveways would intersect perpendicularly with Normandie Avenue and Torrance Boulevard and would not create conflicts for motorists, pedestrians, or bicyclists.

A site access analysis that includes peak hour traffic signal warrants at the driveways was conducted as part of the traffic study. The peak hour warrants were conducted using the existing plus project plus cumulative traffic volumes and are based on the 2013 California Manual of Uniform Traffic Control Devices (Warrant 3 – Peak Hour). The peak hour warrants are included in Appendix D in the traffic study and show that none of the project driveways warrant a traffic signal.

A driveway queuing analysis at Normandie Avenue and Driveway 1 was also conducted for the southbound left-turn to determine if the available storage length could accommodate the project traffic turning into the project site. As shown in Table G in the traffic study, there is sufficient storage available to accommodate the projected southbound left-turn queue.

A sliding metal gate would be installed along driveway 1; however, the gate is positioned approximately 90 feet from the drive entrance to allow for sufficient queuing of vehicles without having project traffic spill onto Normandie Avenue.

While no tenants have been identified, the structure is intended for warehouse and light industrial uses; thus, it can be expected that the project would involve the entrance and exiting of larger delivery trucks. Given the other similar light industrial land uses in the area, this would not be unusual or incompatible.

The project, as designed, would not result in increased safety hazards for vehicles or pedestrians and there would be no impact regarding this threshold.

- e) **Less than Significant Impact.** The project's ingress/egress and circulation are required to meet the LACoFD's standards, which ensure that new developments provide adequate access for emergency vehicles. The proposed site plan incorporates comments by the LACoFD regarding on-site circulation and access for fire department emergency vehicles and crews. The project site and surrounding roadway network do not pose any unique conditions that raise concerns for emergency access, such as narrow, winding roads or dead-end streets. There are overhead electrical power lines that occur along both Torrance Avenue (on the north side) and Normandie Avenue (along the project frontage); however, these are common in urbanized areas and do not pose any unique or significant risk to emergency access. Thus, standard engineering practices are expected to achieve the LACoFD's standards. Final project plans are subject to review and approval by the LACoFD to ensure that the site's access complies with all LACoFD ordinances and policies. With this required compliance, the project would not cause significant impacts due to inadequate emergency access. Therefore, the project would have a less-than-significant impact related to emergency access.

- f) ***Less than Significant Impact.*** Metro, the City of Torrance, and the City of Gardena operate a total of five bus lines along Normandie Avenue, Torrance Boulevard, and Vermont Avenue. The nearest bus stops are located north and west of the project site at the intersection of Normandie Avenue and Torrance Boulevard. The project would not physically affect any existing bus stop or have any effects on existing bus routes. In addition, while there are dedicated but non-contiguous bicycle lanes along sections of Vermont Avenue, there are none directly adjacent to the site, and as discussed under item 17.a) above, there are none planned in the project area. Project implementation would not interfere with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and the project's impact on alternative modes of travel would be less than significant.

References:

County of Los Angeles Department of Public Works. 2012. *Bicycle Master Plan*.

Translutions. 2019. *Bridge Point South Bay II Warehouse Traffic Study*.

18. TRIBAL CULTURAL RESOURCES

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) 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:

i) 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

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ii) 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.

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EVALUATION OF ENVIRONMENTAL IMPACTS:

a)i. ***No Impact.*** The project site is currently developed with multiple structures and approximately 275,000 square-feet of paved area and does not contain any historic resources either listed or eligible for listing in the California Register or in a local register of historical resources. Further, a records search at the South Central Coastal Information Center (SCCIC) determined that there are no documented historic or prehistoric cultural resources on or within a 1/4-mile radius of the project site. Further, an evaluation of the project site and the five remaining buildings with respect to the eligibility criteria for the California Register of Historic Resources was conducted by a qualified architectural historian at Michael Baker International, Inc. (provided in Appendix C of this Initial Study). This evaluation determined that none of the criterion are met and that the project site and the remaining buildings would not be eligible for listing as important historic resources. Further, there is no indication of any tribal cultural resources associated with any of the existing site improvements. Based on the results of the SCCIC search and the evaluation of the remaining buildings with respect to California Register criteria, this project would have no effect on any listed or potentially eligible historic resources that consist of tribal cultural resources.

a)ii. ***Less Than Significant with Mitigation Incorporated.*** Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native Tribes to identify potential significant impacts to Tribal Cultural Resources as defined in the Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of

receipt of the notification if it wishes to engage in consultation on the project and the lead agency must begin consultation within 30 days of receiving the request for consultation.

In compliance with AB 52, on February 1, 2018, the County of Los Angeles notified the Gabrieleño Band of Mission Indians-Kizh Nation and the Gabrieleño Tongva-San Gabriel Band of Mission Indians of the proposed project and requested response if the tribes had a desire to consult. The Gabrieleño Band of Mission Indians-Kizh Nation responded to County staff with a written request for consultation dated February 13, 2018, and consultation was initiated on May 3, 2018. The Kizh Nation advised that the project site lies within ancestral tribal territory and requested that information provided as part of the written consultation remain confidential. Although the tribal representatives did not identify Tribal Cultural Resources within the project site and there are no known resources on the project site, there is a potential for inadvertent impact to such resources that may still be present within native soils on-site. The Kizh Nation provided mitigation measures that would avoid impacting or destroying Tribal Cultural Resources that may be inadvertently unearthed during the project's ground disturbing activities. Mitigation Measure 18-1 is based on and is the same as the mitigation language provided by Kizh Nation and was approved by its tribal government. Therefore, with incorporation of Mitigation Measure 18-1, impacts to Tribal Cultural Resources would be less than significant.

Mitigation Measure 18-1: The applicant shall ensure implementation of the following, to mitigate potential impacts to Tribal Cultural Resources:

- a) *Retain a Native American Monitor:* Prior to issuance of a grading permit, the Applicant shall retain a qualified Native American Monitor who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the Native American Heritage Commission's (NAHC's) Tribal Contact list for the project site area. The Native American Monitor shall monitor all grading activities within the project site. The Monitor shall photo-document the grading activities; maintain a daily monitoring log that describes the daily grading activities, the locations, and soils; and document any identified tribal cultural resources. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Native American Monitor has indicated that the site has a low potential for impacting Tribal Cultural Resources.
- b) *Unanticipated Discovery of Tribal Cultural Resources:* If tribal cultural resources are encountered during Project grading, construction activities within 50 feet of the find shall cease until the find can be assessed. All tribal cultural resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and Native American Monitor shall evaluate the significance of the find and, if significant, recommend appropriate treatment measure(s) to mitigate potential impacts. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible treatment measure(s) that will be necessary to mitigate potential impacts, in consideration of the measure(s) recommended by the Native American Monitor. The Applicant shall ensure that all required treatment measure(s) are properly implemented.
- c) *Unanticipated Discovery of Human Remains and Associated Funerary Objects:* If human remains are encountered during construction activities, all ground-disturbing activities within 50 feet of the human remains shall cease and the County Coroner shall be immediately notified (Health and Safety Code Section 7050.5). If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). The NAHC shall identify the person(s) thought to be the Most Likely Descendent (MLD) of the deceased Native American, who shall have 48 hours from notification by the NAHC to inspect the site of

the discovery of Native American remains and to recommend to the Applicant means for the treatment and disposition of the human remains and associated grave goods. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment shall be placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour security guard shall be posted onsite.

If Native American remains are discovered, the Applicant shall confer with the MLD and implement culturally appropriate measure(s) to ensure the respectful and dignified treatment of the remains and any associated grave goods. Such measures may include preservation in situ, reburial of the remains and associated grave goods onsite at a location that will not be subject to further disturbance, Phase III data recovery with associated documentation, or other appropriate measures, as approved by LACDRP. Scientific study or invasive diagnostics on Native American remains that are discovered onsite shall be prohibited.

- d) Within 60 days after the conclusion of the monitoring effort and/or investigations, the Native American Monitor shall prepare a final report detailing the resources recovered, their significance, and treatment for submittal to the LACDRP and the NAHC.

References:

Michael Baker International. Records Search Results and California Register of Historical Resources Evaluation for the Bridge Point South Bay II Project. July 31, 2018.

19. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Exceed wastewater treatment requirements of either the Los Angeles or Lahontan Regional Water Quality Control Boards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create water or wastewater system capacity problems, or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Create drainage system capacity problems, or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources, considering existing and projected water demands from other land uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create energy utility (electricity, natural gas, propane) system capacity problems, or result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) **No Impact.** The wastewater flow originating from the proposed project would first discharge into an existing new 6-inch lateral sewer that would connect to the local Los Angeles County Consolidated Sewer Maintenance District (LACSMD) 8-inch sewer line in the adjacent section of Torrance Boulevard, and then be conveyed to the Los Angeles County Sanitation District's (LACSD) East Road Trunk Sewer, which conveys regional flows for treatment at the Joint Water Pollution Control Plant in Carson. The Carson plant operates under a National Pollutant Discharge Elimination System Permit (NPDES), issued by the Los Angeles Regional Water Quality Control Board, to regulate volumes of wastewater flows, treatment methods, and the water quality and disposal of the treated effluent.

While no specific tenant has been identified for the project site, the proposed project would result in the generation of wastewater that would be consistent with commercial and light industrial land uses already found in this area and throughout the county's other industrial-zoned areas. As such, the project's wastewater would not require any unique types of treatment processes and would not adversely affect the treatment facilities or processes at the LACSD's Carson Plant.

- b) ***Less than Significant Impact.*** The project includes the construction of two new 2-inch water meters (one for domestic and one for irrigation) and two new 10-inch fire service lateral connections from an existing 10-inch water main in Normandie Avenue. There would be two points of connection to the water main: near the northwest corner of the site and near the southwest corner of the site. In each spot, the connection would occur within the existing sidewalk area and would not affect the adjacent traffic lane in the street. The existing water service connections currently serving the site are to be removed. The proposed project would be served by an existing or a new 6-inch lateral that will connect to the existing LACSMMD 8-inch sewer main in the adjacent section of Torrance Boulevard. Thienes Engineering, the project's civil engineer, has determined that the depth of the existing LACSMMD 8-inch sewer main at the point of connection is sufficient to allow the entire proposed structure to be served by a gravity-fed system. The sewer lateral connection would occur about four to eight feet below Torrance Boulevard, about 45 feet from the curb, and about 200 feet west of the northeast property corner. This would require cutting an open trench in the street, affecting traffic flow for about two to three days.

The temporary and short-term construction impacts associated with the installation of the project's water and wastewater connections to off-site mainline facilities would represent a minor aspect of the overall construction footprint and would not add a significant or unique level of noise, air quality, traffic, or other types of construction impacts. The modeling of construction period air quality impacts and the assessment of temporary construction noise impacts presented in the Air Quality and Noise sections of this Initial Study both account for the construction of water and sewer laterals in the adjacent street segments. Any temporary impacts to traffic flow due to temporary street closure while the street is opened up to construct the sewer connection would be addressed through routine construction traffic control measures, to be developed as part of final plans and specifications, to ensure that emergency access will be maintained and that adequate provisions to maintain thru traffic are provided. Determination of appropriate temporary traffic control measures is a routine part of the final plan check and permitting process and does not require a mitigation measure to enforce.

This site is located within the jurisdictional boundaries of California Water Service (Cal Water), which maintains an existing 6-inch water main located in Torrance Boulevard, and a 10-inch to 12-inch water main in Normandie Avenue. Cal Water issued a "Will Serve" letter in May 2017, stating it would provide potable water at sufficient pressures for domestic and fire service, as needed. In May 2017, Cal Water conducted a dual fire flow test at the 10-inch to 12-inch water main in Normandie Avenue near the southwest corner of the site, indicating what appears to be adequate flow availability.⁶¹ Therefore the project can be adequately served through these existing facilities and no new water mains or other new off-site water infrastructure need to be installed to serve this project. Cal Water will continue to be responsible for monitoring its systemwide water infrastructure facilities to identify and correct capacity or other deficiencies that might occur over time, due to cumulative impacts of growth in its service area, including this local area. That is beyond the scope of this project.

⁶¹ Written communication with Thienes Engineering Inc., February 8, 2018.

As noted in response a), the local sewer flows into the LACSD's East Road Trunk Sewer. According to the LACSD, when last measured in 2016, the East Road Trunk Sewer main has a design capacity of 0.3 million gallons per day (mgd) and conveyed 0.04 mgd. Based on the LACSD's standard wastewater loading factor for a warehousing land use, this project would generate approximately 5,097 gallons/day, or .005 mgd. This volume represents only 1.9 percent of the remaining capacity of that trunk sewer and would not result in a significant capacity impact requiring any physical upgrades.

In addition, as previously noted, wastewater flows will eventually be conveyed to the Joint Water Pollution Control Plant in the City of Carson for treatment. This plant has a design capacity of 400 mgd and currently produces an average recycled water flow of 256.4 mgd. The proposed project's flows of .005 mgd would represent .003 percent of the remaining capacity at the plant; thus, no new treatment facilities or expansion of existing facilities would be required to handle the additional wastewater from the proposed project.

Under the provisions of the California Health and Safety Code, the LACSD may impose a fee upon a proposed project when the project increases the quantity or strength of wastewater discharges to LACSD facilities, either through a direct or indirect connection. This fee is a capital facilities fee that is imposed in an amount sufficient to construct incremental expansion of the sewage system to accommodate a proposed project. The project applicant would be required to pay a connection fee prior to the issuance of a permit to connect to the sewer system, which would offset any incremental impacts to LACSD facilities.

The project's impacts in relation to water or wastewater infrastructure are considered less than significant.

- c) ***Less than Significant Impact.*** The project site drains easterly via an 18-inch storm drain lateral to an 8-foot-wide by 12.5-foot-high, buried reinforced concrete box (RCB) maintained by Los Angeles County that traverses the site near the easterly property line. Allowable discharge into the RCB is 1.1 cubic feet per second (cfs) per acre. This results in an allowable peak flow rate of 9.9 cfs from the project site (1.1 cfs/acre x 8.98 acres). Without detention or another manner of controlling runoff, the proposed project would generate runoff in excess of the allowable peak flow rate. Detention facilities are proposed within the southerly truck yard and the northerly parking lot to reduce project discharge to the 9.8 cfs RCB limit. Complete drainage calculations and methodology may be referenced in Appendix J, Hydrology Study, of this IS/MND.

The development of the project is subject to the provisions of the Countywide NPDES Municipal Separate Storm Sewer System (MS4) permit. The MS4 permit regulates municipal discharges of stormwater and non-stormwater. As such, the project is required to submit a LID Plan. Accordingly, a preliminary LID Plan was prepared for the proposed project by Thienes Engineering Inc., in October 2017. A LID Plan is a stormwater management strategy that emphasizes conservation and the use of existing natural site features integrated with distributed, small-scale stormwater controls to more closely mimic natural hydrologic patterns in residential, commercial, and industrial settings. In part, a LID Plan outlines the methods of control for runoff volume and pre-treatment of pollutants, prior to being released from a project site. As required by the MS4 permit, post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate.

Proposed project on-site storm drainage improvements are described in the response 10.f) of this Initial Study. As discussed therein, the proposed on-site drainage improvements would include underground detention facilities and subsurface drainage lines to convey developed site runoff into the existing County storm drainage structure located along the eastern side of the site. The proposed drainage system is designed to detain flows sufficiently to stay within the capacity limits of that County drainage structure,

during 50-year peak flow conditions. A small portion of the site runoff from landscaped areas along the two street frontages would run off into the adjacent curb and gutter, as under current conditions. The developed site runoff would not exceed the capacity of the County's drainage infrastructure and no off-site drainage improvements would be required. With the proposed Filterra bioretention facilities, the site runoff would be adequately filtered to remove various pollutants, prior to discharge into the County storm drain. Environmental impacts associated with the proposed storm drainage facilities would be less than significant.

- d) ***Less than Significant Impact.*** Cal Water (Dominguez District), which serves the project site, adopted its 2015 Urban Water Management Plan (UWMP) in June 2016. The UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands. In part to determine demands, the UWMP relies upon population and employment estimates developed by the Southern California Association of Governments for various regional planning programs and also creates water demand forecasts based, in part, upon land use classifications identified in the County General Plan Land Use Policy Map and the County's zoning district classifications. Given that the project site is consistent with both the General Plan land use designation in the General Plan 2035 and the County zoning code, the site's water demands were accounted for in the projections used to calculate demand scenarios for the 2015 UWMP. As discussed in the 2015 UWMP, Cal Water, the existing supply facilities, and operations are adequate to provide for projected demand through the year 2040.⁶²

In addition, Cal Water provided the project applicant with a "Will Serve" letter, dated May 23, 2017, for the proposed project. The "will serve" letter from Cal Water indicated that they will provide potable water at such pressure as may be available; however, it may be necessary for the developer to fund the cost of special facilities such as, but not limited to, booster pumps, storage tanks, and/or water wells in addition to the costs of mains and services. This is a standard statement to serve notice to developers that they may be required to provide funding for system-wide improvements to water infrastructure that Cal Water needs to undertake from time to time to maintain its service commitments and correct deficiencies that may be identified over time. Such future improvements cannot be identified at this time and are considered beyond the scope of this project. Cal Water will verify that and determine whether there is a need for any developer financial contributions to water supply resources during the final design process. Therefore, the project would have a less-than-significant impact in relation to this issue.

- e) ***Less Than Significant Impact.*** Specific tenants have not been identified for the proposed project; however, site land uses are expected to consist of light industrial, light manufacturing, assembly, warehousing, and/or distribution of finished or partially finished goods and materials. As with the prior industrial and commercial land uses that occupied the site, any new land uses would require energy resources to operate. The proposed project includes connections to the existing electrical energy infrastructure maintained by Southern California Edison (SCE) in this area, but no natural gas connections. Given the fully urbanized character of this area, the existence of large warehouse buildings in the vicinity and that this is an established service area for SCE, no major upgrades to the electrical system are anticipated. It is estimated that on average warehouse in the United States requires about 6.1 kilowatt hours of electricity per square foot per year of electricity.⁶³ Since specific electrical loads cannot be determined until such time as interior improvements are specified by future tenants, the volume of the project's electrical load cannot be determined at this time. However, the overall regional projections

⁶² California Water Service, Urban Water Management Plan, Dominguez District, June 2016.

⁶³ U.S. Energy Information Administration. Accessed July 1, 2018. <https://www.eia.gov/consumption>.

set forth by energy purveyors is that demand will decline because of California Public Utilities Commission authorized energy efficiency programs.⁶⁴

Prior to establishment of any electrical service in the finished building, the future tenant(s) will need to consult with SCE to determine the specifications of their connections to the SCE local electrical infrastructure. This may require some localized upgrades to SCE's off-site facilities, which would be the responsibility of future tenants. Environmental impacts associated with such potential upgrades are anticipated to be minor and site-specific, primarily affecting the SCE site itself. No energy system capacity problems or major upgrades to existing energy infrastructure are anticipated as a result of this project; impacts would be less than significant.

- f) ***Less than Significant Impact.*** There are nine active and permitted landfills that serve the unincorporated areas of Los Angeles that are located throughout Los Angeles, Ventura and Orange Counties. In addition, there are 50 solid waste diversion programs serving the unincorporated areas, including composting, material recovery facilities, household hazardous-waste collection, public education, recycling, source reduction, special-waste materials (e.g., tires and concrete/asphalt/rubble), and waste-to-energy programs.

Through its Countywide Integrated Waste Management Plan (CIWMP), the Los Angeles County Department of Waste Resources regularly conducts needs assessments, forecasts of future waste generation and disposal patterns, and projections of landfill disposal capacities. In its 2016 annual report charting progress toward the goals of the CIWMP, the LACDPW determined that there are at least 15 years of remaining landfill capacity on a countywide basis.⁶⁵ The County implemented a Non-Exclusive Commercial Solid Waste Collection Franchise System (non-exclusive franchise) on July 1, 2012. A non-exclusive franchise is a system in which the County allows solid waste collection services to be provided by private waste haulers. The general logistics for solid waste disposal is that collected waste is hauled to a materials transfer station and sorted in regard to waste that can be recycled or reused, versus waste that will ultimately be disposed of at one of the County operated landfills. Some solid waste may also be disposed of at a transformation facility, which converts solid waste into energy. Each hauler may select whatever landfill is most advantageous to transport wastes to for final disposal, thus the wastes from the proposed project could ultimately be disposed of at a number of landfill sites. If any landfills that typically receive wastes from the project site should require closure at some future point due to reaching permitted capacity limits or otherwise, then the wastes would be transported to different landfills.

This warehouse project would generate a variety of typical municipal solid wastes associated with warehouse and distribution businesses, estimated to include paper, plastics, cardboard, metals, glass, and electronic wastes. Potential quantities of such wastes cannot be calculated without specific floor plans, definition of business activities, employee counts, etc., which cannot be determined at this time. In addition, there is the potential for the warehouse activities to dispose of small quantities of some hazardous materials or waste that are incidental to the primary business, such as chemical cleaning agents, paints, solvents, glues, etc. Under the proposed CUP, only warehouse businesses involving storage and transport of raw materials, partially finished or finished products would be allowed and no businesses that would require storage, use, transport or disposal of large quantities of hazardous materials and wastes would be permitted. Given the infill location of this project where solid wastes have been generated and disposed of through the municipal waste stream for many years, and given the regional scale of landfill disposal facilities, this project would not have a significant impact on landfill capacity in

⁶⁴ SCE and So Cal Gas have a combined procurement portfolio. <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>.

⁶⁵ Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan 2016. Annual Report.

either Los Angeles County, or on landfills located in other counties that receive smaller portions of solid wastes from unincorporated Los Angeles County.

- g) ***Less than Significant Impact.*** Assembly Bill (AB) 939, the California Integrated Waste Management Act of 1989, was passed in 1989. AB 939 required every city and county in California to reduce the amount of waste disposed at landfills by 25 percent by 1995 and 50 percent by 2000. In response to this legislation, the County adopted the Los Angeles Countywide Siting Element in 1998 identifying 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, in addition to a countywide siting element specifying areas for transformation or disposal sites with capacity for solid waste generated in the jurisdiction that cannot be reduced or recycled for a 15-year period. An updated Countywide Siting Element is currently in process. In addition, the County has established a variety of programs, including the Los Angeles County Materials Exchange, which is a free countywide materials reuse service that can help individuals find markets for surplus materials and other usable discards, and the Smart Business Recycling Program, in which businesses located in unincorporated county jurisdictions can receive a free on-site waste reduction consultation. According to Calrecycle, as of 2014, the diversion rate for the unincorporated area of Los Angeles County was 50 percent.⁶⁶

The County of Los Angeles Board of Supervisors adopted the Construction and Demolition Debris Recycling and Reuse Ordinance on January 4, 2005. The ordinance added Chapter 20.87 to the Los Angeles County Code, which requires projects in the unincorporated areas to recycle or reuse 50 percent of the debris generated. Its purpose is to increase the diversion of construction and demolition debris from disposal facilities and assist the County in meeting the state of California's waste reduction mandate. To further meet the state mandate, the ordinance was supplemented in January 2011 to comply with the provisions of the California Green Building Standards Code, which requires in part that construction projects consisting of commercial, industrial, or retail structures, as well as all tenant improvements, irrespective of the square footage, must recycle a minimum of 65 percent of the debris generated by weight.

The project would comply with the applicable federal, state, and local statutes and regulations related to solid waste. During construction, waste materials, such as building materials from the demolished structures, concrete/pavement, or asphalt would be disposed of in accordance with the Construction and Demolition Debris Recycling and Reuse Ordinance. While it cannot be precisely determined how much debris waste would be generated during construction, the Ordinance does require that 50 percent of that waste be diverted. Wastes generated during the long-term operational life of the project are anticipated to consist mainly of municipal solid and liquid wastes that can be collected and disposed of through the normal trash collection services offered in this area. Volumes of such wastes could range considerably, depending upon the ultimate tenants that occupy the building and the specific characteristics of their operations. As required by Mitigation Measure 8-6 as a GHG emission reduction measure, separate bins for recyclable and nonrecyclable materials will be provided on-site, to facilitate efforts to divert waste materials from landfill disposal. If any future tenants should generate hazardous wastes, those businesses would be obligated to comply with applicable regulations governing storage, transport, and disposal of such wastes outside of the municipal waste stream. Electronic wastes (e-wastes) can be disposed of during scheduled e-waste collection events sponsored by the County and/or

⁶⁶ <http://www.calrecycle.ca.gov/LGCentral/Reports/Jurisdiction/DiversionDisposal.aspx>, accessed February 16, 2018. Year 2014 diversion rates are the most recent published on the Calrecycle website.

private entities. Therefore, the proposed project would not result in conflicts with solid waste statutes or regulations and the project's solid waste disposal impact would be less than significant.

References:

- Calrecycle (California Department of Resources Recycling and Recovery). 2018. Countywide, Regionwide, and Statewide Jurisdiction Diversion/Disposal Progress Report. Accessed February 16, 2018.
<http://www.calrecycle.ca.gov/LGCentral/Reports/Jurisdiction/DiversionDisposal.aspx>.
- California Water Service. 2015. Urban Water Management Plan 2015.
- . 2017. Dominguez District, Will Serve Letter Southeast Corner of Torrance Boulevard and Normandie Avenue, May 23, 2017.
- Los Angeles County. 2018a. Department of Public Works. Reduce, Reuse, Recycle. Accessed February 15, 2018.
<http://dpw.lacounty.gov/epd/cleanla/3Rs.aspx>.
- . 2018b. Construction Debris Recycling, and Reuse Program. Accessed March 14, 2018.
<http://dpw.lacounty.gov/epd/cd/>.
- Los Angeles County Sanitation District. 2018. Will Serve Letter for Bridgepoint South Bay II, January 31, 2018.
- Placeworks. 2014. Los Angeles County General Plan Update 2035 Draft Environmental Impact Report Southern California Gas Company. Accessed July 10, 2018.
<https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>.
- Thienes, Brian, personal communication, February 8, 2018
- U.S. Energy Information Administration. Accessed July 1, 201. <https://www.eia.gov/consumption>.
- Thienes Engineering, Inc. 2017a. Preliminary Hydrology Calculations.
- . 2017b. Low Impact Development Plan.

20. WILDFIRE

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a-e) No Impact.** The proposed project site is not located within or adjacent to a very high fire hazard severity zone, as designated by State of California Office of the State Fire Marshall (Cal Fire, 2012). Therefore, the wildfire questions on the Initial Study Checklist are not applicable in this case and the project would have no impacts related to wildfire.

References:

Cal Fire (California Department of Forestry and Fire Prevention). 2012. Los Angeles County Very High Fire Hazard Severity Zones in LRA map. Accessed September 10, 2019.
<https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf>.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

- a) ***Less Than Significant with Mitigation Incorporated.*** As discussed in the response to Checklist topic 4 - Biological Resources, the fully disturbed project site has been developed for decades with a variety of commercial and industrial uses, does not contain any natural habitat or any type of water resources, and does not support any species identified as a candidate, sensitive, or special-status species protected under any state or federal regulations. There is a potential, however, for protected migratory bird species to utilize the few trees and vegetation areas, and possibly other open spaces on the vacant site as nesting opportunities, and construction activities could, therefore, potentially disrupt nesting or even cause harm to fledgling birds. Mitigation Measure 4-1 will prevent potential impacts to birds that are listed as state or federally endangered or threatened or listed under the federal Migratory Bird Treaty Act (MBTA), Federal Endangered Species Act, the California Endangered Species Act, or fully protected state bird species through biological surveys during the breeding season, so that any active nests can be identified and construction prevented in the vicinity until the nests are no longer active. As discussed in the response to Checklist topic 5 - Cultural Resources, there are no historic resources among the existing site improvements.

Also, given the extensive level of site disturbance, there is a low potential that prehistoric or historic archaeological resources, or paleontological resources could be discovered during grading into native (previously undisturbed) soil materials beneath and around the proposed building footprint. Nonetheless, to prevent damage or destruction of potentially important archaeological and paleontological resources, Mitigation Measures 5-1 through 5-7 will be implemented to require construction monitoring by a qualified archaeologist. Further, Mitigation Measure 5-2 will require the archaeologist, Native American monitor, and paleontologist to meet with construction crews performing grading activities to discuss the types of resources that may be encountered and ways to identify them. In addition to Mitigation Measure 5-2, Mitigation Measures 5-3, 5-4, 5-6, and 5-7 detail archaeological and paleontological artifact identification, treatment, and reporting requirements, all of which would avoid destruction of potentially significant resources. While tribal resources have not been documented to exist on the project site, Mitigation Measure 18-1 will be implemented so that if potential tribal cultural resources are discovered during ground disturbance within previously undisturbed soils, that the resources are properly identified and properly handled, as directed by a qualified Native American monitor.

- b) ***Less Than Significant Impact.*** The proposed project would represent a long-term commitment to redevelop this site with a modern warehouse and distribution facility that would participate in the Southern California economy for many years. By removing the remnants of past land use site improvements, implementing a variety of control measures to prevent releases of environmental contaminants during construction, and providing impervious surfaces that would provide a barrier above subsurface materials that contain traces of contaminants such as DDT, petroleum hydrocarbons and metals, the project would facilitate achievement of a long-term environmental goal of restoring a contaminated site to a productive land use without creating environmental hazards for surrounding properties.
- c) ***Less Than Significant with Mitigation Incorporated.*** As discussed in the response to Checklist topic 3 - Air Quality, the project-related emissions of criteria air pollutants would be below the SCAQMD's regional thresholds, which were established to determine the levels at which project-level emissions would be considered to be cumulatively considerable. There are no other pending development or capital improvement projects in the vicinity that could result in environmental impacts that could combine with impacts of the proposed project and result in potentially significant cumulative impacts. As discussed in the response to Checklist topic 17 – Transportation/Traffic, the project's traffic, combined with existing traffic and future traffic growth in this area, would worsen cumulatively significant congestion impacts on the local street network, but the project would pay its fair share of costs to improve traffic flow at the three impacted locations, as required by Mitigation Measure 17-1. This would reduce the project's impact to less than significant.
- d) ***Less Than Significant with Mitigation Incorporated.*** As discussed in the response to Checklist topic 3 – Air Quality, the project's emissions of criteria pollutants would be below applicable SCAQMD regional and local thresholds and would not result in violation of any federal or state air quality standards. A quantitative Health Risk Assessment prepared for this project (see Appendix B of this Initial Study), which determined that emissions of DPM associated with on-site truck movements and operation of diesel-powered off-street equipment, such as forklifts and street sweepers, would be below the SCAQMD cancer risk thresholds, and the project's impacts involving generate of DPM would be less than significant. Nonetheless, PDF 3-4 will be implemented to require that all off-road equipment be powered by batteries or non-diesel fuels that do not emit DPMs.

As discussed in the response to Checklist topic 9 – Hazards and Hazardous Materials, the project would help prevent releases of environmental contaminants through proper demolition, removal, and disposal of the remnant building materials, and through establishment of a warehouse use and related site improvements that would overlies soils containing traces of contaminants such as DDT, petroleum hydrocarbons and metals. An HHRA has been prepared, in accordance with USEPA specifications, which indicates the proposed project would not result in a significant human health risk on or off-site. The HHRA has been reviewed and approved by the USEPA and the DTSC. Nonetheless, a comprehensive SMP will be implemented, as required by Mitigation Measure 9-3, to ensure that any additional contaminants that might be found are properly identified and treated, to prevent releases of dangerous contaminants to the ground, water or air during construction activities. Mitigation Measures 9-1 and 9-2 will require pre-construction surveys of the vacant buildings on-site, to ensure proper identification and removal of any asbestos-containing building materials or lead-based paint, when those buildings are demolished. Mitigation Measure 9-4 will require recordation of a land use covenant approved by the USEPA to restrict the site to use by industrial or commercial businesses and to prohibit any residential use of the site.

As discussed in the response to Checklist topic 13 – Noise, demolition of existing structures, grading, and construction of the proposed structure would result in adverse mobile equipment construction noise impacts at residential properties surrounding the project site. Mitigation Measure 13-1 will be implemented to ensure that mobile construction equipment noise associated with the project remains below the Los Angeles County's mobile construction equipment noise threshold of 75 dBA for nearby single-family homes. Mitigation Measure 13-1 will achieve this outcome by requiring the contractor to erect a temporary, minimum 14-foot-high sound wall along the project's shared property line with residential uses to the east. A 14-foot-high sound barrier will also be erected along the easternmost 100 feet of the northern property line and both barriers will remain in place throughout demolition and construction. Mitigation Measure 13-2 will ensure that maximum stationary equipment noise levels would remain below the 60-dBA threshold for any neighboring single-family homes and below the 65-dBA threshold for any multi-family homes on the north side of Torrance Boulevard by requiring a minimum 8-foot-high sound blanket on three sides of any air compressors and generators utilized on the project site. Further, the equipment must be placed a minimum of 100 feet away from any residential property line.

Collectively, the proposed project design and these mitigation measures will further ensure that the proposed project does not result in environmental effects that could adversely affect human beings, directly or indirectly.