

**CEQA FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE CITY OF INDUSTRY GENERAL PLAN UPDATE
ENVIRONMENTAL IMPACT REPORT
STATE CLEARINGHOUSE NO. 2011031090**

Exhibit A

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. The City of Industry (City), as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the Draft EIR (DEIR) and Final EIR (FEIR).

Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the FEIR.
 - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures

must be fully enforceable through permit conditions, agreements, or other measures.

- (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in CEQA Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

Regarding a Statement of Overriding Considerations, CEQA Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the FEIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the FEIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed, and considered the DEIR and FEIR for the City of Industry General Plan Update, SCH No. 2011031090 (collectively, the EIR), as well as all other information in the record of proceedings on this matter, the following Findings and Facts in Support of Findings (Findings) and Statement of Overriding Considerations (SOC) are hereby adopted by the City in its capacity as the CEQA lead agency.

These Findings set forth the environmental basis for the discretionary actions to be undertaken by the City for the implementation of the project. These actions include the approval and/or certification of the following:

- City of Industry General Plan Update;
- General Plan Update Implementation Plan;
- Environmental Impact Report (SCH No. 2011031090);

These actions are collectively referred to herein as the “project”.

A. Document Format

These Findings have been organized into the following sections:

- **Section I** provides an introduction to these Findings; a summary of the project and a list of the project’s objectives; a summary of the environmental review process; a summary of the record of findings; and a summary of the custodian and location of records.
- **Section II** provides a summary of the environmental impacts of the project; sets forth findings and facts regarding the environmental impacts of the project—as a result of the Initial Study, consideration of comments received during the Notice of Preparation (NOP) comment period, and analysis in the EIR— that were determined to be either not significant or to be less than significant without the need for mitigation measures; sets forth findings and facts regarding the environmental impacts of the project that were determined in the EIR to be feasibly mitigated to a less than significant level through the imposition of General Plan policies and/or mitigation measures; and sets forth the findings and facts regarding the significant or potentially significant unavoidable environmental impacts identified in the EIR that will or may result from the project and which the City has determined cannot feasibly be mitigated to a less than significant level.
- **Section III** sets forth findings and facts regarding alternatives to the project.
- **Section IV** provides an introduction to the SOC, provides a summary of the significant unavoidable impacts and alternatives of the project, and explains why the project benefits outweigh the significant unavoidable environmental impacts of the project.

B. Project Summary

Project Location

The City of Industry is in eastern Los Angeles County, within the East San Gabriel Valley region, near the junction of Orange and Riverside counties. The City encompasses approximately 7,706 acres, or 12 square miles. The City is surrounded by portions of unincorporated Los Angeles County (including Valinda and South San Jose Hills) and the cities of La Puente, Baldwin Park, West Covina, and Walnut to the north; the cities of Pomona and Diamond Bar to the east; unincorporated

portions of Los Angeles County (including Hacienda Heights and Rowland Heights) to the south; and portions of unincorporated Los Angeles County (including Bassett and Avocado Heights) and the cities of Pico Rivera and El Monte to the west.

Project Description

The project is the update of the City's General Plan. The Industry General Plan Update would guide the growth and development (e.g., infill development, redevelopment, and revitalization/restoration) of the City 25 years or more into the future. The General Plan Update involves a revision to the current land use map and all elements except Housing, which was adopted February 11, 2014. The General Plan would guide growth and development within the City by designating land uses on the proposed land use map and through implementation of goals and policies. The General Plan Update consists of the following elements: Land Use, Circulation, Resource Management (previously Open Space, Historic and Cultural, City Image, and Scenic Highway, and Safety (includes Noise). Because the Housing Element was recently updated and is subject to specific laws and timeframes dictated by the state, it is not included in the comprehensive update of the General Plan.

Assuming a theoretical, full buildout (post-2035 scenario) of the land use plan, the City of Industry (including its Sphere of Influence) could accommodate approximately 98,128,503 square feet of employment uses, 11,877,163 square feet of commercial uses, 238.9 acres dedicated to institutional purposes, 840.6 acres dedicated to recreation and open space, and 108,008 jobs.

Project Objectives

The guiding vision and statement of objectives sought by the project and set forth in the EIR is provided as follows:

Guiding Vision: Be an employment base and commercial and business hub for the San Gabriel Valley and Los Angeles metropolitan area.

- Maintain a diverse and prosperous economy consisting of a variety of industrial, professional, and commercial uses.
- Achieve a sustained economic viability that provides a tax base supportive of the City's growth potential, maintains fiscal viability, and funds capital improvement programs that serve present and future businesses.
- Provide the flexibility to respond to changing market conditions.
- Enhance the value of businesses and properties within the City such that additional investment is stimulated by providing a quality level of services, safety, security, infrastructure, and design.
- Achieve a professional appearance in the City marked by a functional quality in its buildings and structures, landscaping, signage, and utilities and infrastructure systems.
- Provide prudent public ownership, improvement, and strategic partnership to achieve the City's economic development and revitalization goals.
- Provide infrastructure and circulation systems that are properly sized to support future growth and are maintained in a timely fashion.

- Support the surrounding population through sponsorship of community-building programs, such as the Youth Activities League, and through a development review process that considers our neighbors and non-business uses.

C. Environmental Review Process

In conformance with CEQA, the State CEQA Guidelines, and the City of Industry CEQA Guidelines, the City conducted an extensive environmental review of the project. The environmental review process has included:

- Completion of an Initial Study (IS)/Notice of Preparation (NOP), which concluded that an EIR should be prepared. The IS/NOP was released for a 30-day public review period from March 28 to April 26, 2011. The NOP was posted at the Los Angeles County Clerk's office and published in the San Gabriel Valley Tribune. Copies of the IS were made available for public review at the City of Industry City Hall and the Diamond Bar, Walnut, Los Angeles County, La Puente, and Hacienda Heights Public Libraries.
- Completion of the scoping process where the public was invited by the City to participate in a scoping meeting held on April 19, 2011, at the City of Industry City Hall. The notice of a public scoping meeting was included in the aforementioned NOP.
- Preparation of a DEIR by the City, which was made available for a 45-day public review period that began February 28, 2014, and closed April 14, 2014. The scope of the DEIR was determined based on the City's IS/NOP and comments received in response to the IS/NOP. Section 2.2, *Notice of Preparation and Initial Study*, of the DEIR describes the issues identified for analysis in the DEIR. The Notice of Availability (NOA) for the DEIR was sent to interested persons and organizations, sent to the State Clearinghouse in Sacramento for distribution to state agencies, posted at the Los Angeles County Clerk's office, and published in the San Gabriel Valley Tribune. Copies of the DEIR were made available for public review at the City of Industry City Hall and the Diamond Bar, Walnut, Los Angeles County, La Puente, and Hacienda Heights Public Libraries and on the City's website.
- Preparation of an FEIR, including the Responses to Comments to the DEIR, the Findings of Fact, and the Statement of Overriding Considerations. The FEIR contains comments on the DEIR, responses to those comments, and revisions to the DEIR. The FEIR was released to commenting agencies for a 10-day agency review period prior to certification of the FEIR.
- Public hearings for the project, including a Planning Commission hearing on May 22, 2014, and a City Council hearing on June 5, 2014.

D. Record of Findings

For purposes of CEQA and these Findings, the Record of Proceedings for the project consists of the following documents and other evidence, at a minimum:

- The NOP, NOA, and all other public notices issued by the City in conjunction with the project.
- The DEIR and FEIR for the project.
- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR.

- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR.
- All written and verbal public testimony presented during a noticed public hearing for the project.
- The mitigation monitoring and reporting program (MMRP).
- The reports and technical memoranda included or referenced in the DEIR and FEIR.
- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and FEIR.
- The resolutions adopted by the City in connection with the project, and all documents incorporated by reference therein.
- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings.
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

E. Custodian and Location of Records

The documents and other material that constitute the record of proceedings on which these Findings are based are located at the City of Industry, 15625 East Stafford, Suite 100, City of Industry, CA 91744-0366. The City of Industry is the custodian of these documents. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the City's Planning Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e).

II. FINDINGS AND FACTS REGARDING ENVIRONMENTAL IMPACTS

A. Summary of Environmental Impacts

Based on the NOP and DEIR, the following is a summary list of the environmental topics considered to have no impact, a less than significant impact, a less than significant impact with incorporation of mitigation measures, and a significant and unavoidable impact.

No Impact

- Agricultural and Forest Resources
- Biological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Noise
- Public Services

- Utilities and Service Systems

Less Than Significant Impact

- Aesthetics
- Biological Resources
- Cultural Resources (historic resources and disturbance of human remains)
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Less Than Significant Impact with Mitigation Incorporated

- Air Quality
- Cultural Resources

Significant and Unavoidable Impact

- Air Quality
- Greenhouse Gas Emissions
- Noise
- Transportation and Traffic

B. Impacts Determined to Not be Significant or to be Less Than Significant

Initial Study

As a result of the Notice of Preparation circulated by the City on March 28, 2011, in connection with preparation of the DEIR, the City determined, based upon the threshold criteria for significance, (Appendix G of the CEQA Guidelines) that the project would have no impact or a less than significant impact on the following potential environmental issues, and therefore, determined that these potential environmental issues would not be addressed in the DEIR. Based on the environmental analysis presented in the DEIR, and the comments received by the public on the DEIR, no substantial evidence was submitted or identified by the City that indicated that the project would have an impact on the following environmental areas:

1. Agriculture and Forest Resources

- The project area does not contain prime farmland, unique farmland, or farmland of statewide importance.
- No portion of the project area conflicts with existing zoning for agricultural use or is covered by a Williamson Act Contract.

- The project area does not include forest land, timberland, or timberland zoned as timberland production.
- The project does not result in the loss of forest land or conversion of forest land to non-forest use.
- The project does not result in changes in the existing environment that could result in the conversion of farmland to non-agricultural use or forest land to non-forest land use.

2. Biological Resources

- The project would not conflict with any local policies or ordinances protecting biological resources.
- The project would not conflict with the provisions of an adopted conservation plan.

3. Cultural Resources

- The project would not disturb any human remains.

4. Geology and Soils

- The project area is not susceptible to the rupture of a known earthquake fault.
- The project area does not consist of the use of septic tanks or alternative waste water disposal systems.

5. Hazards and Hazardous Materials

- The project area is not located within an airport land use plan.

6. Hydrology and Water Quality

- The project would not place housing within a 100-year flood hazard area.

7. Land Use and Planning

- The project would not physically divide an established community.
- The project would not conflict with the provisions of an adopted conservation plan.

8. Mineral Resources

- The project would not result in the loss of availability of a known mineral resource.
- The project would not result in the loss of availability of a locally important mineral resource recovery site.

9. Noise

- The project is not located within an airport land use plan.

10. Public Services

- The project would not result in impacts to parks or library facilities.

11. Recreation

- The project would not lead to an increase the use of existing neighborhood and regional parks or other recreational facilities.
- The project does include recreational facilities or require the construction or expansion of recreational facilities.

12. Transportation and Traffic

- The project would not result in a change in air traffic patterns.

13. Utilities and Service Systems

- The project would comply with federal, state, and local statutes and regulations related to solid waste.

DEIR

The following impacts were evaluated in the DEIR and determined to be less than significant through implementation of General Plan Update, its policies, and adherence with existing laws, codes, and statutes. Based on the environmental analysis presented in the DEIR, and the comments received by the public on the DEIR, no substantial evidence was submitted to or identified by the City indicating that the project would have a potentially significant impact on the following environmental areas:

1. Aesthetics

- Implementation of the General Plan Update would not substantially alter or damage scenic vistas or resources in the City or along a state scenic highway.
- Implementation of the General Plan Update would not substantially degrade the existing visual character or quality of the City and its surroundings.
- Implementation of the General Plan Update would not result in significant light and glare impacts in the City and surrounding land uses.

2. Air Quality

- Implementation of the General Plan Update would not result in significant impacts related to objectionable odors.

3. Biological Resources

- Implementation of the General Plan Update would not result in significant impacts related to sensitive species.
- Implementation of the General Plan Update would not result in significant impacts related to sensitive natural communities.
- Implementation of the General Plan Update would not result in significant impacts related riparian habitat.
- Implementation of the General Plan Update would not result in significant impacts related to jurisdictional waters of any agency.
- Implementation of the General Plan Update would not result in significant impacts related to wildlife movement.

4. Cultural Resources

- Implementation of the General Plan Update would not significantly impact historic resources.

5. Geology and Soils

- Implementation of the General Plan Update would not result in significant impacts related to the exposures of people or structures to seismic-related hazards such as ground shaking, liquefaction, and seismically induced settlement.
- Implementation of the General Plan Update would not result in significant impacts related to hazards arising from ground subsidence, compressible soils, expansive soils, and erosion.

6. Hazards and Hazardous Materials

- Implementation of the General Plan Update would not result in a significant impact related to the transport, use, and/or disposal of hazardous materials.
- Implementation of the General Plan Update would not result in a significant impact related to the listing of hazardous materials sites.
- Implementation of the General Plan Update would not result in a significant impact related to the proximity of private airstrips.
- Implementation of the General Plan Update would not affect the implementation of an emergency response or evacuation plan.
- Implementation of the General Plan Update would not result in a significant impact related to exposing future development to a fire hazard zone.

7. Hydrology and Water Quality

- Implementation of the General Plan Update would not result in a significant impact related to increased pollutant concentrations during construction and operational phases.
- Implementation of the General Plan Update would not result in a significant impact related to groundwater recharge.
- Implementation of the General Plan Update would not result in a significant impact on drainage systems within the San Gabriel River watershed.
- Implementation of the General Plan Update would not result in a significant impact related to FEMA-designated flood hazard zones.
- Implementation of the General Plan Update would not result in a significant impact related to permitting development within the inundation areas of the Puddingstone, Santa Fe, and Whittier Narrows dams.
- Future development that would be accommodated by the General Plan Update would not be subject to inundation by a seiche or mudflow.

8. Land Use and Planning

- Implementation of the General Plan Update would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.

9. Noise

- Increase in traffic on local roadways as a result of future development that would be accommodated by the General Plan Update would not lead to a substantial increase of the existing noise environment.
- Future development that would be accommodated by the General Plan Update would not expose noise-sensitive uses to significant noise levels from transportation and stationary sources.
- Implementation of the General Plan Update would not expose sensitive land uses along the freeways and the Union Pacific Railroad corridors to significant levels of groundborne vibration.
- Future development that would be accommodated by the General Plan Update would not expose future residents and workers to significant overflight-related noise from heliports.

10. Population and Housing

- Implementation of the General Plan Update would not induce substantial population growth within the San Gabriel Valley Council of Governments subregion.
- Implementation of the General Plan Update would not result in the displacement of people or housing.

11. Public Services

- Future development that would be accommodated by the General Plan Update would not lead to a substantial increase in the requirement for fire protection facilities and personnel.
- Future development that would be accommodated by the General Plan Update would not lead to a substantial increase in the requirement for police protection facilities and personnel.
- Future development that would be accommodated by the General Plan Update would not lead to a significant impact or demand on school facilities.

12. Transportation and Traffic

- Circulation improvements associated with future development that would be accommodated by the General Plan Update would not create hazardous conditions (sharp curves, etc.) or impact emergency access.
- Future development that would be accommodated under the General Plan Update would comply with adopted policies, plans, and programs for alternative transportation.

13. Utilities and Service Systems

- Adequate water supply, treatment systems, and infrastructure are available to meet requirements of future development that would be accommodated by the General Plan Update.
- Wastewater generated by future development that would be accommodated by the General Plan Update could be adequately treated by the wastewater provider serving the City.
- Future development that would be accommodated by the General Plan Update would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.

- Existing and/or proposed storm drainage systems are adequate to serve the drainage requirements of future development that would be accommodated by the General Plan Update.
- Existing and/or proposed facilities would be able to accommodate solid waste that would be generated by future development that would be accommodated by the General Plan Update.
- Existing and/or proposed facilities would be able to accommodate utility demands that would be generated by future development that would be accommodated by the General Plan Update.

C. Impacts Mitigated to Less Than Significant

The following summary describes impacts of the project that, without mitigation, would result in significant adverse impacts. However, upon implementation of the mitigation measures provided in the EIR, these impacts would be considered less than significant.

Air Quality

1. Environmental Impact:

Industrial land uses associated with theoretical buildout of the General Plan Update have the potential to generate odors that could affect a substantial number of people [Threshold AQ-5].

Support for this environmental impact conclusion is fully discussed starting on page 5.2-21 of Section 5.2, *Air Quality*, of the DEIR.

Construction activity would require the operation of equipment that may generate exhaust from either gasoline or diesel fuel. Construction and development would also require the application of paints and the paving of roads, which could generate odors. As these odors are short term and quickly disperse into the atmosphere, this is not considered significant.

Future development would involve minor odor-generating activities, such as lawn mower exhaust and application of exterior paints for building improvement. These types and concentrations of odors are typical of developments and are not considered significant air quality impacts.

Industrial uses, including food processing facilities and waste transfer stations, have the potential to generate substantial odors. Individual projects, including commercial, industrial, and office, associated with the General Plan Update are also required to comply with SCAQMD Rule 402 to prevent occurrence of public nuisances. While these odors would be required to be controlled, additional measures may be warranted to prevent a nuisance, depending on the nature of the proposed use. Consequently, industrial land uses associated with theoretical buildout of the General Plan Update may generate odors that affect a substantial number of people.

Mitigation Measures:

The following mitigation measures were included in the DEIR, and are applicable to the project.

- 2-3 If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to Planning Director review. Facilities that have the potential to generate nuisance odors include but are not limited to:

- Wastewater treatment plants
- Composting, greenwaste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

If an odor management plan is determined to be required through CEQA review, the City will require the project applicant to submit the plan prior to approval to ensure compliance with the South Coast Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan will identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan will be identified as mitigation measure in the environmental document and/or incorporated into the site plan.

Finding:

With implementation of the mitigation measure identified above, impacts associated with objectionable odors would be deemed less than significant. The City of Industry hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Cultural Resources

1. Environmental Impact:

Future development that would be accommodated by the General Plan Update could impact unknown archeological and/or paleontological resources [Thresholds C-2 and C-3].

Support for this environmental impact conclusion is fully discussed starting on page 5.4-10 of Section 5.4, *Cultural Resources*, of the DEIR.

Long-term implementation of the General Plan Update land use plan could allow development (e.g., infill development, redevelopment, and revitalization/restoration), including grading, of unknown sensitive areas. Grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially cause the disturbance of archeological or paleontological resources. Therefore, future development that would be accommodated by the General Plan Update could potentially unearth previously unrecorded archeological or paleontological resources.

Additionally, development plans for the vacant 592-acre IBC site in the eastern end of the City have also been previously analyzed under separate EIRs. Therefore, development of the site would be controlled by mitigation measures and project design features outlined in those EIRs, including those related to cultural resources, if and when the development plans for the IBC site get implemented.

Mitigation Measures:

The following mitigation measures were included in the DEIR, and are applicable to the project.

4-1 Prior to the issuance of grading permits for new development projects on previously undeveloped/graded parcels, the City of Industry will require project applicants to provide studies (e.g., Phase I Records Search) to document the presence/absence of archeological and/or paleontological resources. On properties where resources are identified, such studies will provide a detailed mitigation plan, including a monitoring program and recovery and/or preservation plan, based on the recommendations of a qualified cultural preservation expert. The mitigation plan will include the following requirements:

- An archaeologist and/or paleontologist will be retained for the project and will be on call during grading and other significant ground-disturbing activities.
- Should any cultural resources be discovered, no further grading will occur in the area of the discovery until the Planning Director or his/her designee is satisfied that adequate provisions are in place to protect these resources.
- Unanticipated discoveries will be evaluated for significance by a Los Angeles County Certified Professional Archaeologist/Paleontologist. If significance criteria are met, then the project applicant will be required to perform data recovery, professional identification, radiocarbon dates, and other special studies; submit materials to a museum for permanent curation; and provide a comprehensive final report including a catalog with museum numbers.

Finding:

With implementation of the mitigation measures identified above, impacts associated with archeological and paleontological resources would be deemed less than significant. The City of Industry hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

D. Significant Unavoidable Adverse Impacts

The following potentially significant environmental impacts were analyzed in the DEIR, and the effects of the project were considered. Because of the environmental analysis of the project and the identification of relevant General Plan policies and implementation measures; compliance with existing laws, codes, and statutes; and the identification of feasible mitigation measures, some potentially significant impacts have been determined by the City to be reduced to a level of less than significant, and the City has found—in accordance with CEQA Section 21081(a)(1) and State CEQA Guidelines Section 15091(a) (1)—that “Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. This is referred to herein as “Finding 1.” Where the City has determined—pursuant to CEQA Section 21081(a)(2) and State CEQA Guidelines Section 15091(a)(2)—that “Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency,” the City’s finding is referred to herein as “Finding 2.”

Where, as a result of the environmental analysis of the project, the City has determined that either: (1) even with the compliance with existing laws, codes and statutes, and/or the identification of feasible mitigation measures, potentially significant impacts cannot be reduced to a level of less than significant, or (2) no feasible mitigation measures or alternatives are available to mitigate the potentially significant impact, the City has found in accordance with CEQA Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3) that “Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.” This is referred to herein as “Finding 3.”

Air Quality

1. Environmental Impact

Theoretical buildout of the City of Industry in accordance with the General Plan Update would potentially conflict with the South Coast Air Quality Management District's Air Quality Management Plan [Threshold AQ-1].

Support for this environmental impact conclusion is fully discussed starting on page 5.2-14 of Section 5.2, *Air Quality*, of the DEIR.

The project would not be consistent with the Air Quality Management Plan (AQMP) because air pollutant emissions associated with theoretical buildout of the City in accordance with the General Plan Update would cumulatively contribute to the existing nonattainment designations in the South Coast Air Basin (SoCAB). Additionally, theoretical buildout of the General Plan Update would exceed current estimates of employment for Industry, which are based on regional trends and will be updated to reflect the proposed General Plan Update, and therefore these emissions are not included in the current regional emissions inventory for the SoCAB. Therefore, the project would be considered inconsistent with the AQMP, resulting in a significant impact in this regard.

Mitigation Measures:

Mitigation Measures 2-1 and 6-1 apply.

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation measures incorporated into future development projects for operation and construction phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies included in the General Plan Update would facilitate continued City participation/cooperation with SCAQMD and SCAG to achieve regional air quality improvement goals, promotion of energy conservation design and development techniques, encouragement of alternative transportation modes, and implementation of transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the AQMP to a level of less than significant due to the magnitude of emissions that would be generated by the theoretical cumulative buildout of the City in accordance with the General Plan Update. Therefore, despite the implementation of goals and policies and application of mitigation measures, this impact is significant and unavoidable.

2. Environmental Impact

Construction activities associated with theoretical buildout of the General Plan Update would generate short-term emissions that exceed SCAQMD's regional and localized significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5} and cumulatively contribute to the SoCAB nonattainment designations [Thresholds AQ-2, AQ-3, and AQ-4].

Support for this environmental impact conclusion is fully discussed starting on page 5.2-16 of Section 5.2, *Air Quality*, of the DEIR.

Due to the scale and extent of construction activities pursuant to future development that would be accommodated by theoretical buildout of the General Plan Update, the project would likely exceed the SCAQMD regional significance thresholds and therefore, in accordance with the SCAQMD methodology, would cumulatively contribute to the nonattainment designations of the SoCAB. Consequently, construction-related air quality impacts are deemed to be significant.

Mitigation Measures:

2-1 If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the South Coast Air Quality Management District (SCAQMD) adopted thresholds of significance, the City of Industry Planning Department will require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include, but are not limited to:

- Requiring fugitive dust control measures that exceed SCAQMD's Rule 403, such as:
 - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
 - Applying water every four hours to active soil-disturbing activities.
 - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website at: http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf.

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation measures incorporated into future development projects for construction phases would reduce construction-related air pollutant emissions associated with theoretical buildout of the General Plan Update. Additionally, goals and policies are included in the General Plan Update that would reduce air pollutant emissions. However, due to the magnitude of emissions that would be generated by future construction activities associated with the theoretical cumulative buildout of the General Plan Update, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Therefore, despite the implementation of goals and policies and application of mitigation measures, this impact is significant and unavoidable.

3. Environmental Impact

Theoretical buildout in accordance with the General Plan Update would generate long-term emissions that would exceed SCAQMD's regional significance thresholds for VOC, CO, NO_x, PM₁₀, and PM_{2.5} and cumulatively contribute to the SoCAB nonattainment designations [Thresholds AQ-2 and AQ-3].

Support for this environmental impact conclusion is fully discussed starting on page 5.2-17 of Section 5.2, *Air Quality*, of the DEIR.

Future development associated with theoretical buildout of the General Plan Update would generate long-term operational-related emissions that would exceed the SCAQMD's significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB. Consequently, long-term operational-related air quality impacts are deemed to be significant.

Mitigation Measures:

Mitigation Measures 6-1 applies.

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation Measure 6-1 requires preparation of a Climate Action Plan to reduce greenhouse gas emissions impacts. Measures considered as part of the Climate Action Plan to reduce idling, natural gas use, and encourage use of alternative-fueled vehicles would also reduce criteria air pollutants within the City. Additionally, goals and policies are included in the General Plan Update that would reduce long-term air pollutant emissions. However, due to the magnitude of long-term operational-related emissions that would be generated by the theoretical buildout of the General Plan Update, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Therefore, despite the implementation of goals and policies and application of mitigation measures, this impact is significant and unavoidable.

4. Environmental Impact

Operation of new stationary/area sources and truck idling within the City of Industry could generate substantial concentrations of criteria air pollutants that exceed SCAQMD's localized significance thresholds and/or toxic air contaminants [Threshold AQ-4].

Support for this environmental impact conclusion is fully discussed starting on page 5.2-19 of Section 5.2, *Air Quality*, of the DEIR.

Operation of new land uses, consistent with the Land Use Plan of the General Plan Update, would generate new sources of criteria air pollutants and toxic air contaminants (TACs) within the City from area/stationary sources and mobile sources, which in turn could expose sensitive receptors to substantial TAC concentrations. Land uses that have the potential to generate substantial stationary sources of TACs include industrial land uses, such as chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. In addition to stationary/area sources of TACs, warehousing operations could generate a substantial amount of diesel particulate matter

emissions from off-road equipment use and truck idling. Consequently, this would represent a significant impact.

Mitigation Measures:

2-2 New industrial or warehousing land uses that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units (TRUs), and 2) are located within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, will submit a health risk assessment (HRA) to the City of Industry Planning Department prior to future discretionary project approval. The HRA will be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds one in one hundred thousand (1.0E-05) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that Best Available Control Technologies for Toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA will be identified as mitigation measures in the environmental document and/or incorporated into the development plan as a component of the proposed project.

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation Measure 2-2 would ensure mobile sources of TACs not covered under SCAQMD permits are considered during subsequent project-level environmental review. Additionally, goals and policies are included in the General Plan Update that would reduce concentrations of criteria air pollutant emissions and air toxics generated by new development. Further, review of projects by SCAQMD for permitted sources of air toxics would ensure health risks are minimized. However, the incremental increase in health risk associated with individual projects that would be accommodated by the General Plan Update is considered cumulatively considerable and would contribute to already elevated levels of cancer and non-cancer health risks in the SoCAB. Therefore, despite the implementation of goals and policies and application of mitigation measures, this impact is significant and unavoidable.

Greenhouse Gas Emissions

1. Environmental Impact

Theoretical buildout of the City of Industry pursuant to the maximum level allowed by the land use designations of the General Plan Update Land Use Plan would generate a substantial increase in GHG emissions over existing conditions [Thresholds GHG-1 and GHG-2].

Support for this environmental impact conclusion is fully discussed starting on page 5.6-13 of Section 5.6, *Greenhouse Gas Emissions*, of the DEIR.

Theoretical buildout of the General Plan Update would result in a substantial increase in GHG emissions. The City would not achieve SCAQMD's proposed per capita efficiency threshold. Therefore, GHG emissions are considered to be substantial enough to result in a significant cumulative impact relative to GHG emissions. Additionally, even with implementation of the statewide measures to reduce GHG emissions, the City would fall short of the GHG reduction goals of Assembly Bill 32. Consequently, this impact is considered significant.

Mitigation Measure:

6-1 The City of Industry will prepare a Climate Action Plan (CAP) within 24 months after adopting the General Plan Update. The goal of the CAP will be to reduce GHG emissions from activities where the City has jurisdictional control within the City boundaries to support the State's efforts under Assembly Bill 32 and to mitigate the impact of climate change. The CAP will include the following:

- **Emission Inventories:** The City will establish GHG emissions inventories including emissions from all sectors within the City that the City has jurisdictional control over, using methods approved by, or consistent with guidance from, the California Air Resources Board (CARB); the City will update inventories every five years or as determined by state standards to incorporate improved methods, better data, and more accurate tools and methods, and to assess progress. If the City is not on schedule to achieve the GHG reduction targets, additional measures will be implemented, as identified in the CAP.
- **Emission Targets:** The City will develop a plan to reduce or encourage reductions in community-wide GHG emissions consistent with the GHG reduction goals of AB 32 (i.e., 15 percent below existing emissions or percent reduction below business as usual based on the current state 2020 emissions forecasts).
- **GHG Reduction Measures:** The CAP will include specific measures to achieve the GHG emissions reduction targets. The CAP will quantify the approximate greenhouse gas emissions reductions of each measure and measures will be enforceable. Measures listed below, along with others, will be considered during the development of the CAP. Once adopted, the City of Industry Planning Department will require that applicants for new development projects incorporate feasible mitigation measures to reduce GHG during operational activities. Potential measures may include:
 - *Area Sector.* Implement a Truck Idling Emissions Reduction Program, which includes:
 - Requiring diesel emission reduction strategies, such as electrifying docking bays, to eliminate and/or reduce idling at truck stops, warehouses, and distribution facilities throughout the City.
 - Monitoring of the California Air Resources Board's five-minute nonessential idling restrictions for trucks and locomotive idling restrictions.
 - Evaluation of strategies to reduce truck idling during the peak hour period of the roadway network, such as staggered work/delivery schedules, truck routes, and/or intersection improvements.

- *Transportation and Area Sector.* Support and promote the use of low- and zero-emission vehicles, by:
 - Encouraging the necessary infrastructure to facilitate the use of zero-emission vehicles and clean alternative fuels, such as electric vehicle charging facilities and conveniently-located alternative fueling stations.
 - Encouraging new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEV) and/or plug-in electric hybrids (PHEV).
 - Encouraging transportation fleet standards to achieve the lowest emissions possible, using a mix of alternate fuels, partial ZEV, or newer fleet mixes.
- *Transportation Sector.* Coordinate with the Union Pacific Railroad to encourage commercial facilities to utilize rail for long haul.
- *Transportation Sector.* Require employers with more than 20 employees—which is equivalent to 9,000 square feet of retail space, 17,000 square feet of big-box retail space, 7,000 square feet of office space, 19,00 square feet of manufacturing spaces, 30,000 square feet of warehousing and distribution, or 16,000 square feet of light industrial—to implement an Employee Commute Trip Reduction Program that may include the following measures:
 - Ride-share programs
 - Discounted transit programs
 - End-of-trip facilities (e.g., showers and lockers)
 - Telecommuting
- *Energy Sector.* Require new developments to achieve the Tier 1 California Green Building Code (CALGreen) standards, which include requirements that new buildings exceed the current Title 24 Building and Energy Efficiency Standards by 15 percent.
- *Energy Sector.* Establish green building requirements and standards for new development and redevelopment projects, and work to provide incentives for green building practices and remove barriers that impede their use.
- *Energy Sector.* Encourage the performance of energy audits of buildings prior to completion of sale, and that audit results and information about opportunities for energy efficiency improvements be presented to the buyer.
- *Energy Sector.* Work with utility providers to identify large users of energy and encourage existing land owners to conduct a free energy audit that will provide information about opportunities for energy efficiency improvements, including:
 - Energy-efficient heating, ventilation, and air conditioning (HVAC) units.
 - Energy-efficient boilers.
 - Co-generation/combined heat and power systems.
- *Energy Sector.* Establish policies and programs that facilitate the siting of new renewable energy generation.

- Review and revise building and development codes, design guidelines, and zoning ordinances to remove renewable energy production barriers.
 - Work with related agencies, such as fire, water, health, and others, that may have policies or requirements that adversely impact the development or use of renewable energy technologies.
 - Develop protocols for safe storage of renewable and alternative energy products with the potential to leak, ignite, or explode, such as biodiesel, hydrogen, and/or compressed air.
 - Promote and encourage renewable energy generation and co-generation projects where feasible and appropriate.
- *Water and Wastewater.* Establish programs and policies to increase the use of recycled water, including promoting the use of recycled water for industrial and irrigation purposes.
 - *Other.* Recognize businesses in the City that reduce GHG emissions (e.g., reduced energy use) to encourage GHG reductions and recognize success.
 - *Other.* Promote reductions in GHG emissions by using the City's purchasing power when choosing suppliers of its goods and services.

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation Measure 6-1 requires preparation of a Climate Action Plan to reduce greenhouse gas emissions impacts. Additionally, goals and policies are included in the General Plan Update that would reduce greenhouse gas emissions. However, due to the magnitude of long-term operational-related emissions that would be generated by the theoretical buildout of the General Plan Update, no mitigation measures are available that would align the City's GHG reduction goals with the GHG reduction targets of Assembly Bill 32. Therefore, despite the implementation of goals and policies and application of mitigation measures, this impact is significant and unavoidable.

Noise

1. Environmental Impact

Construction activities for development of the individual land uses that would be accommodated by the General Plan Update could expose sensitive uses to strong levels of groundborne vibration [Threshold N-2].

Support for this environmental impact conclusion is fully discussed starting on page 5.10-24 of Section 5.10, *Noise*, of the DEIR.

Significant short-term vibration impacts may occur from construction activities for individual development projects that would be accommodated by the General Plan Update. Because construction activities associated with any individual development may include pile driving near sensitive receptors, temporary vibration impacts associated with construction during individual development projects may be substantially elevated. Consequently, this impact is considered significant.

Mitigation Measures:

- 10-1 Individual development projects that involve vibration-intensive pile-driving activities during construction, as determined during any accompanying CEQA analysis, will be evaluated for potential vibration impacts to nearby structures. If construction-related vibration is determined to exceed the Federal Transit Administration criteria for architectural damage of 0.2 peak particle velocity (PPV) inches per second (in/sec) for non-engineered timber and masonry buildings, 0.3 PPV in/sec for engineered concrete and masonry buildings, or 0.5 PPV in/sec for reinforced concrete, steel, or timber buildings, additional requirements, such as use of less vibration-intensive equipment or construction techniques, will be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driving).

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation Measure 10-1 would reduce the potential vibration impacts associated with construction activities to the extent feasible. However, due to the potential proximity of construction activities to sensitive uses and the potential longevity of construction activities, no mitigation measures are available that would reduce impacts to a level of less than significant. Therefore, despite the application of mitigation measures, this impact is significant and unavoidable.

2. Environmental Impact

Construction activities for development of the individual land uses that would be accommodated by the proposed Land Use Plan would substantially elevate noise levels in the vicinity of noise-sensitive land uses [Threshold N-4].

Support for this environmental impact conclusion is fully discussed starting on page 5.10-26 of Section 5.10, *Noise*, of the DEIR.

Significant short-term noise impacts may occur from construction activities for individual development projects that would be accommodated by the General Plan Update. Specifically, construction activities associated with any individual development may substantially elevate temporary noise levels in the vicinity of noise-sensitive land uses. Consequently, this impact is considered significant.

Mitigation Measures:

- 10-2 Construction activities associated with new development that occurs near (nominally within 500 feet) sensitive receptors will be evaluated for potential noise impacts. Mitigation measures such as installing temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing nonessential idling of construction equipment to no more than five minutes will be incorporated into the construction plans to reduce construction-related noise to the extent feasible.

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation Measure 10-2 would reduce the potential noise impacts associated with construction activities to the extent feasible. Additionally, goals and policies are included in the General Plan Update that would reduce noise impacts. However, due to the potential proximity of construction activities to sensitive uses and the potential longevity of construction activities, no mitigation measures are available that would reduce impacts to a level of less than significant. Therefore, despite the implementation of goals and policies and application of mitigation measures, this impact is significant and unavoidable.

3. Environmental Impact

Future development that would be accommodated by the General Plan Update would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and would conflict with an applicable congestion management plan [Threshold N-4].

Support for this environmental impact conclusion is fully discussed starting on page 5.13-81 of Section 5.13, *Transportation and Traffic*, of the DEIR.

Theoretical buildout of the General Plan Update is expected to cause significant traffic impacts at 7 of the 21 freeway mainline segments analyzed under the Existing (Year 2010) With Project Condition and at 15 of the 21 freeway mainline segments analyzed under the Post-2035 General Plan Buildout Condition.

Mitigation Measures:

Existing (Year 2010) With Project Condition

13-2 To address the City of Industry’s proportionate impact on freeway mainline segments under the Existing (Year 2010) With Project Condition, the City of Industry will participate in relevant and applicable programs developed and adopted by Caltrans to pay for I-10, I-605, and SR-60 freeway mainline lane improvements. Once the need for improvements has been identified by Caltrans for a particular freeway mainline segment and a program for implementing the required improvements has been developed, the City will coordinate with Caltrans, as appropriate. Contributions may be in the form of developer fees, freeway improvements, development in-lieu of fees, state or federal funds or other programs, as appropriate. Contributions required of individual development projects will be determined on a project-by-project basis at the time of development application review and will be based on a traffic analysis undertaken for individual development projects.

The Existing (Year 2010) With Project Condition freeway mainline segment improvements are outlined below:

- B. I-10, east of Garvey Avenue (eastbound) – Project fair-share percentage: 1.1 percent
- C. I-10, east of I-605 (eastbound) – Project fair-share percentage: 2.0 percent
- E. SR-60, east of Peck Road (westbound) – Project fair-share percentage: 8.4 percent

- I. SR-60, east of Hacienda Boulevard (westbound) – Project fair-share percentage: 14.9 percent
- J. SR-60, east of Azusa Avenue (westbound) – Project fair-share percentage: 14.5 percent
- P. SR-60, east of Grand Avenue (eastbound) – Project fair-share percentage: 7.0 percent
- S. I-605, south of SR-60 (northbound) – Project fair-share percentage: 2.8 percent

Post (Year 2035) General Plan Buildout Condition

13-3 To address the City of Industry’s proportionate impact on freeway mainline segments under the Post-2035 General Plan Buildout Condition, the City of Industry will participate in relevant and applicable programs developed and adopted by Caltrans to pay for I-10, I-605, and SR-60 freeway mainline lane improvements. Once the need for improvements has been identified by Caltrans for a particular freeway mainline segment and a program for implementing the required improvements has been developed, the City will coordinate with Caltrans, as appropriate. Contributions may be in the form of developer fees, freeway improvements, development in lieu of fees, state or federal funds, or other programs, as appropriate. Contributions required of individual development projects will be determined on a project-by-project basis at the time of development application review and will be based on a traffic analysis undertaken for individual development projects.

The Post-2035 General Plan Buildout Condition freeway mainline segments improvements are outlined below:

- B. I-10, east of Garvey Avenue (eastbound) – Project fair-share percentage: 12.0 percent
- C. I-10, east of I-605 (eastbound and westbound) – Project fair-share percentage: 12.7 percent eastbound, 12.4 percent westbound
- F. SR-60, east of I-605 (westbound) – Project fair-share percentage: 22.8 percent
- G. SR-60, east of Crossroads Parkway (westbound) – Project fair-share percentage: 22.8 percent
- I. SR-60, east of Hacienda Boulevard (eastbound and westbound) – Project fair-share percentage: 18.6 percent eastbound, 23.1 percent westbound
- J. SR-60, east of Azusa Avenue (eastbound and westbound) – Project fair-share percentage: 20.7 percent eastbound, 22.8 percent westbound
- K. SR-60, east of Fullerton Road (eastbound and westbound) – Project fair-share percentage: 20.5 percent eastbound, 22.7 percent westbound
- L. SR-60, east of Nogales Street (eastbound and westbound) – Project fair-share percentage: 20.4 percent eastbound, 22.3 percent westbound
- M. SR-60, east of Fairway Drive (eastbound and westbound) – Project fair-share percentage: 19.5 percent eastbound, 21.8 percent westbound
- N. SR-60, east of Brea Canyon Road (eastbound and westbound) – Project fair-share percentage: 20.5 percent eastbound, 18.8 percent westbound
- P. SR-60, east of Grand Avenue (eastbound and westbound) – Project fair-share percentage: 16.7 percent eastbound, 16.1 percent westbound
- Q. I-605, south of Rose Hills Road (northbound and southbound) – Project fair-share percentage: 12.7 percent northbound, 12.3 percent southbound
- R. I-605, south of Peck Road (southbound) – Project fair-share percentage: 12.3 percent

- S. I-605, south of SR-60 (northbound) – Project fair-share percentage: 14.6 percent
- U. I-605, south of I-10 (northbound) – Project fair-share percentage: 20.0 percent

Finding:

The City makes Finding 3 and determines that this impact is significant and unavoidable and a Statement of Overriding Considerations is required.

Facts in Support of Finding:

Mitigation Measures 13-2 and 13-3 require contributions toward the cost of improvements needed to mitigate direct, project-related proportionate impacts under the Existing (Year 2010) With Project and Post (Year 2010) General Plan Buildout Conditions on the freeway mainline segments outlined in these mitigation measures. Additionally, goals and policies are included in the General Plan Update that would reduce traffic and transportation impacts. However, because the improvements needed for the affected freeway mainline segments are under Caltrans’s sole jurisdiction, the City itself cannot implement the freeway improvements. Therefore, a significant temporary or short-term impact may occur if the timing of the freeway improvements is uncertain (e.g., Caltrans does not have the total necessary funds to implement the freeway improvements at the time the City of Industry pays its fair share contributions). Consequently, despite the implementation of goals and policies and application of mitigation measures, impacts to freeway mainline segments as a result of implementation of the General Plan Update would be significant and unavoidable.

III. FINDINGS AND FACTS REGARDING PROJECT ALTERNATIVES

A. Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the EIR.

Alternative Development Area

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]). However, since the project consists of a General Plan Update, an alternative development area analysis is not appropriate. More specifically, since the project is specific to the City of Industry and its Sphere of Influence (SOI), no feasible alternative development area exists that could be used for meaningful analysis.

No Project/No Development Alternative

The No Project/No Development Alternative assumes no new development would occur, restricting any growth within the City of Industry. No alterations to the City would occur (with the exception of previously-approved development), and all residential development and commercial and industrial uses would generally remain in their current conditions. No new roadway infrastructure improvements (local or regional) or other capital improvement programs would be funded or implemented. It is assumed that the current population (approximately 463 people) of the City would not change, though it should be recognized that the City cannot in reality control whether population growth occurs. Therefore, some minor population growth could occur within the City, to the extent

that existing residential units could accommodate additional residents. Any population growth in the City would be accommodated through increasing the number of persons per household. Future conditions within the City, except for the impacts of regional growth, would generally be the same as existing conditions.

It should be noted that this is a purely hypothetical alternative that is not realistic given that even if the General Plan Update is not adopted by the City, property owners in Industry would retain the development rights they have under the current General Plan.

None of the impacts of the proposed General Plan Update would result under this alternative since new development would not be accommodated. This alternative would reduce the magnitude of impacts associated with implementation of the General Plan Update. In particular, this alternative would avoid the increased impacts to the local and regional circulation system that could occur as the development facilitated by the General Plan Update occurs. Other impacts that would be lower, but not eliminated, than would occur under the project relate to air quality, greenhouse gas emissions, and noise. It should be noted however that existing land uses already result in significant air quality impacts. More specifically, existing land uses exceed various South Coast Air Quality Management District (SCAQMD) regional significance thresholds. Therefore, air quality would not improve even if no new development would occur.

Implementation of this alternative would not, on the other hand, provide additional jobs to the surrounding population through the variety of professional and employment-generating uses proposed under the General Plan Update. The employment growth that would be accommodated under the General Plan Update would help improve the jobs/housing balance of the San Gabriel Valley region, which is generally housing rich. Additionally, this alternative would not help meet one of the key project objectives, to provide infrastructure and circulation systems that are properly sized to support future growth and are maintained in a timely fashion. However, regional traffic growth would still occur, resulting in the potential for traffic impacts that would otherwise be mitigated by the project. It should also be noted that this alternative would not achieve any of the objectives established for the project. Therefore, this alternative has been rejected from further consideration.

B. Alternatives Selected for Further Analysis

The following three alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project and have the potential to avoid or substantially lessen one or more of the significant effects of the project.

- No-Project/Existing General Plan Alternative
- Reduced Intensity Alternative
- Increased Office and Decreased Warehousing/Distribution Alternative

Alternatives Comparison

The following statistical analysis provides a summary/comparison of general socioeconomic theoretical buildout projections of the three alternatives and the project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but rather provide a theoretical buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the three alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in this chapter.

Table 1 identifies City-wide information regarding dwelling unit, population, and employment projections, and also provides the nonresidential square footage for the project and each of the alternatives.

Table 1 Statistical Summary Comparison

	General Plan Update	No Project/Existing General Plan Alternative	Reduced Intensity Alternative	Increased Office and Decreased Warehousing/ Distribution Alternative
Commercial	12,569,136 SF	761,592	10,055,308 SF	16,492,596
Employment	98,701,614 SF	141,043,220	78,961,291 SF	74,251,514
Recreation and Open Space	840.6 Acres	751.6 Acres	840.6 Acres	840.6 Acres
Institutional	132.7 Acres	44.8 Acres	132.7 Acres	132.7 Acres
Dwelling Units	59	59	59	59
Population	463	463	463	463
Jobs	109,715	125,082	87,772	104,625

1. No-Project/Existing General Plan Alternative

The No Project/Existing General Plan Alternative, as required by the CEQA Guidelines, analyzes the effects of continued implementation of the current Industry General Plan. This alternative assumes the current General Plan would remain the adopted long-range planning policy document for the City. Development would continue to occur in the City in accordance with the current General Plan and Zoning Code. Buildout pursuant to the General Plan would allow current development patterns to remain.

The No Project/Existing General Plan Alternative would accommodate a total of 761,592 square feet of commercial uses, 141,043,220 square feet of employment uses, 751.6 acres of recreation and open space, and 44.8 acres of institutional uses (see Table 1, *Statistical Summary Comparison*). In relation to theoretical buildout of the proposed General Plan Update, this alternative would include the same number of dwelling units (59, which includes 57 dwelling units and 2 group homes) and population (463); approximately 11,807,544 fewer square feet of commercial uses; approximately 42,341,606 more square feet of employment uses; approximately 87.9 fewer acres of institutional uses; approximately 89 fewer acres of recreation and open space; and approximately 15,367 more jobs.

Environmental Effects:

The No-Project/Existing General Plan Alternative would have similar impacts (less than significant) with regards to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems, though greater for some of these. This alternative would not reduce or eliminate the project’s significant air quality, GHG, noise, or traffic impacts. In fact, this alternative would increase impacts related to short- and long-term air quality, GHG, short- and long-term noise, and short-term traffic.

Ability to Achieve Project Objectives:

This alternative would meet most of the project objectives, with the exception of the following:

- Maintain a diverse and prosperous economy consisting of a variety of industrial, professional, and commercial uses.

- Achieve a sustained economic viability that provides a tax base supportive of the City's growth potential, maintains fiscal viability, and funds capital improvement programs that serve present and future businesses.
- Provide the flexibility to respond to changing market conditions.

Additionally, unlike the No Project/Existing General Plan Alternative, the General Plan Update includes a refinement of land use designations, redesignation of certain areas to better correspond with existing economic and development plans, and increased policy direction for the City overall.

Feasibility:

Since the No-Project/Existing General Plan Alternative would allow the continuation of the current General Plan, the feasibility of this alternative would rely on the feasibility of the allowed land uses.

Finding:

As stated above, this alternative would not reduce or eliminate the project's significant air quality, GHG, noise, or traffic impacts. In fact, this alternative would increase impacts related to short- and long-term air quality, GHG, short- and long-term noise, and short-term traffic. Additionally, this alternative would not meet three of the key project objectives. Furthermore, the benefits of providing additional employment in the housing-rich San Gabriel Valley Council of Governments (SGVCOG) subregion under this alternative and the economic stability benefits tied to additional employment would not be realized to the full extent that would be provided with the project. For these reasons, the City rejects this alternative and finds that the project is preferred over this alternative.

2. Reduced Intensity Alternative

The Reduced Intensity Alternative would reduce the remaining growth potential associated with the proposed General Plan Update by 20 percent. The 20 percent reduction was based on the total theoretical buildout of the General Plan Update and applied citywide. More specifically, this alternative would reduce total commercial square footage to 10,055,308 and total employment square footage to 78,961,291 compared to the proposed General Plan Update. Land use designations would remain the same.

In relation to theoretical buildout of the proposed General Plan Update, this alternative would include the same number of dwelling units (59, which includes 57 dwelling units and 2 group homes) and population (463); the same amount of recreation and open space (840.6 acres) and institutional (132.7 acres) uses; approximately 2,513,828 fewer square feet of commercial uses; approximately 19,740,323 fewer square feet of employment uses; and approximately 21,943 fewer jobs (see Table 1, *Statistical Summary Comparison*).

Environmental Effects:

The Reduced Intensity Alternative would have similar impacts (less than significant) with regard to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems, though slightly reduced for some of these. This alternative would reduce project-related significant and unavoidable impacts associated with air quality, GHG, noise and traffic, but would not eliminate these impacts.

Ability to Achieve Project Objectives:

This alternative would meet all of the objectives of the project, with the exception of one of the City's key objectives, to provide flexibility to respond to changing market conditions. Although this alternative would meet most of the project objectives, it would not meet them to the same extent as the project would. Additionally, this alternative does not accommodate as many opportunities for employment growth in order to improve the jobs/housing balance in the SGVCOG subregion, which is considered housing rich.

Feasibility:

This alternative is considered physically and environmentally feasible.

Finding:

The Reduced Intensity Alternative has been identified as the environmentally superior alternative. However, while this alternative would reduce project-related significant and unavoidable impacts associated with air quality, GHG, noise and traffic, it would not eliminate these impacts. Additionally, this alternative would not meet one of the City's key objectives to provide the flexibility to respond to changing market conditions, nor would it accommodate as many opportunities for employment growth in order to improve the jobs/housing balance in the San Gabriel Valley Council of Governments subregion, which is considered housing rich. Furthermore, the benefits of providing additional employment in the housing-rich SGVCOG subregion under this alternative and the economic stability benefits tied to additional employment would not be realized to the full extent that would be provided with the project. For these reasons, the City rejects this alternative and finds that the project is preferred over this alternative.

3. Increased Office and Decreased Warehousing/Distribution Alternative

The Increased Office and Decreased Warehousing/Distribution Alternative would increase the amount of office square footage and decrease the amount of warehousing/distribution square footage associated with the proposed General Plan Update. The increase and reduction were based on the total theoretical buildout of the General Plan Update and applied citywide. This alternative would increase total commercial square footage to 16,492,596 and reduce total employment square footage to 74,251,514 compared to the proposed General Plan Update. Specifically, the office use of the commercial land use designation would increase by 25 percent and the warehousing/distribution use of the employment land use designation would decrease by 25 percent. All other uses and associated square footages within the Commercial and Employment land use designations would remain the same. Land use designations would also remain the same.

In relation to theoretical buildout of the proposed General Plan Update, this alternative would include the same number of dwelling units (59, which includes 57 dwelling units and 2 group homes) and population (463); the same amount of recreation and open space (840.6 acres) and institutional (132.7 acres) uses; approximately 3,923,460 more square feet of commercial uses; approximately 24,450,100 fewer square feet of employment uses; and approximately 5,090 fewer jobs (see Table 1, *Statistical Summary Comparison*).

Environmental Effects:

The Increased Office and Decreased Warehousing/Distribution Alternative would have similar impacts (less than significant) with regard to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems. This alternative

would reduce project-related significant and unavoidable impacts associated with air quality and GHG, but would not eliminate these impacts nor would it eliminate the project's short- and long-term significant noise impacts. In fact, this alternative would increase the project's significant short-term traffic impacts.

Ability to Achieve Project Objectives:

This alternative would meet all of the objectives of the project, with the exception of one of the City's key objectives, to provide flexibility to respond to changing market conditions. Because of its location and key role in the local and regional goods movement, Industry has experienced an increase in and need for warehouse/distribution uses in the region. Therefore, this alternative would impede Industry from meeting this key objective because it would substantially lessen the City's ability to respond to changing market conditions and to meet the regional need for warehouse/distribution uses. Additionally, although this alternative would meet most of the project objectives, it would not meet them to the same extent as the project would.

Feasibility:

The alternative is considered physically feasible. However, this alternative would require significant revisions to the General Plan Land Use Plan.

Finding:

As stated above, this alternative would reduce project-related significant and unavoidable impacts associated with air quality and GHG; however, it would not eliminate these impacts. Additionally, this alternative would not eliminate the project's short- and long-term noise impacts or short-term traffic impacts. In fact, it would increase significant short-term traffic impacts. Furthermore, this alternative would not meet one of the City's key objectives to provide the flexibility to respond to changing market conditions. As stated above, this alternative would impede Industry from meeting this key objective since it would substantially lessen the City's ability to respond to changing market conditions and to meet the regional need for warehouse/distribution uses. The increase in office uses under this alternative would decrease the City's ability to offer the broad range of warehouse/distribution opportunities available under the project. For these reasons, the City rejects this alternative and finds that the project is preferred over this alternative.

IV. STATEMENT OF OVERRIDING CONSIDERATIONS

A. Introduction

The City is the lead agency under CEQA for preparation, review, and certification of the EIR for the Industry General Plan Update. As the Lead Agency, the City is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the lead agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the project. In making this determination, the City is guided by State CEQA Guidelines Section 15093, which provides as follows:

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal (sic)

project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, Public Resources Code Section 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section 21081(b) and the State CEQA Guidelines Section 15093, the City has balanced the benefits of the project against the following unavoidable adverse impacts associated with the project and has adopted all feasible mitigation measures with respect to these impacts. The City has also examined alternatives to the project, none of which both meet the project objectives and is environmentally preferable to the project for the reasons discussed above in the Findings.

The Industry City Council, the lead agency for the project, and having reviewed the EIR for the Industry General Plan update, and reviewed all written materials within the City’s public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the project.

B. SIGNIFICANT UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS AND PROJECT ALTERNATIVES

Although most potential project impacts have been substantially avoided or mitigated, as described in Section II, *Findings and Facts Regarding Environmental Impacts*, of these Findings, there remain some project impacts for which complete mitigation is not feasible. For some impacts, mitigation measures were identified and adopted by the City; however, even with implementation of the measures, the City finds that the impact cannot be reduced to a level of less than significant. The impacts are summarized below and addressed in detail in the Section II. A summary of the project alternative is also provided below, which are addressed in detail in Section III, *Findings and Facts Regarding Project Alternatives*, of these Findings.

Air Quality

- Mitigation measures incorporated into future development projects for operation and construction phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies are included in the General Plan Update that would facilitate continued City cooperation with the South Coast Air Quality Management District (SCAQMD) and Southern California Association of Governments to

achieve regional air quality improvement goals; promotion of energy conservation design and development techniques; encouragement of alternative transportation modes; and implementation of transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management plan and impacts would remain significant and unavoidable due to the magnitude of emissions that would be generated by the theoretical buildout of the City in accordance with the General Plan Update.

- Mitigation measures incorporated into future development projects for construction phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies are included in the General Plan Update that would reduce air pollutant emissions. However, due to the magnitude of emissions that would be generated by future construction activities, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds, and impacts would remain significant and unavoidable.
- Mitigation measures incorporated into future development projects for operation phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies are included in the General Plan Update that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by future development that would be accommodated by the General Plan Update, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Mitigation Measure 6-1 requires preparation of a Climate Action Plan to reduce greenhouse gas (GHG) emissions impacts. Measures considered as part of the Climate Action Plan to reduce idling, natural gas use, and encourage use of alternative-fueled vehicles would also reduce criteria air pollutants within the City. However, operational phase criteria air pollutant impacts would remain significant and unavoidable.
- Goals and policies are included in the General Plan Update that would reduce concentrations of criteria air pollutant emissions and air toxics generated by new development. Review of projects by SCAQMD for permitted sources of air toxics would ensure health risks are minimized. Mitigation Measure 2-2 would ensure mobile sources of toxic air contaminants not covered under SCAQMD permits are considered during subsequent project-level environmental review. Development of individual projects may achieve the incremental risk thresholds established by SCAQMD. However, the incremental increase in health risk associated with individual projects is judged to be cumulatively considerable and would contribute to already elevated levels of cancer and noncancer health risks in the South Coast Air Basin, and impacts would remain significant and unavoidable.

Greenhouse Gas Emissions

- Theoretical buildout of the City of Industry in a post-2035 scenario would contribute to global climate change through direct and indirect GHG emissions. GHG emissions are considered substantial enough to result in a significant cumulative impact. Statewide GHG emissions reduction measures that are being implemented over the next 10 years would assist the City in reducing its community-wide GHG emissions. However, even with statewide measures, the City would fall short of the state's goal to reduce existing emissions by 15 percent from existing levels. Despite implementation of mitigation measures requiring the City to prepare and implement a plan to align the City's GHG reduction goals with the GHG reduction targets of Assembly Bill 32, impacts would remain significant and unavoidable.

Noise

- Mitigation Measure 10-1 (construction-related vibration) would reduce the potential impacts associated with construction activities to the extent feasible. However, due to the potential proximity of construction activities to sensitive uses and the potential longevity of construction activities, and despite the application of mitigation measures, construction-related vibration impacts would remain significant and unavoidable.
- Mitigation Measure 10-2 (construction-related noise) would reduce the potential impacts associated with construction activities to the extent feasible. However, due to the potential proximity of construction activities to sensitive uses and the potential longevity of construction activities and despite the application of mitigation measures, construction-related noise impacts would remain significant and unavoidable.

Transportation and Traffic

- Mitigation Measures 13-2 and 13-3 require the City of Industry to participate in relevant and applicable programs developed and adopted by Caltrans for I-10, I-605, and SR-60 freeway mainline lane improvements needed to mitigate direct, project-related impacts under the Existing (Year 2010) With Project and Post-2035 General Plan Buildout Conditions. However, because the improvements needed for the affected freeway mainline segments are under Caltrans's sole jurisdiction, the City cannot implement the freeway improvements itself. Therefore, a temporary or short-term impact may occur if the timing of the freeway improvements is uncertain (e.g., Caltrans does not have the total necessary funds to implement the freeway improvements at the time the City of Industry participates in the adopted Caltrans program). Consequently, impacts to freeway mainline segments as a result of implementation of the General Plan Update would remain significant and unavoidable.

Alternatives

The EIR evaluated three alternatives to the project (No-Project/Existing General Plan Alternative, Increased Office and Decreased Warehousing/Distribution Alternative, and Reduced Intensity Alternative) and analyzed whether these alternatives could avoid or substantially lessen the unavoidable environmental impacts of the project. Some of the alternatives lessened some of the significant unavoidable impacts of the project and some resulted in different or increased environmental impacts. One alternative, the Reduced Intensity Alternative, was identified as the environmentally superior alternative. Additionally, some of the alternatives met some or most of the project objectives. However, for reasons set forth in Section III, *Findings and Facts Regarding Project Alternatives*, of these Findings, all three alternatives were rejected by the City, and the City finds that the project is preferred over the alternatives.

C. CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The City, after balancing the specific economic, legal, social, technological, and other benefits of the project, has determined that the unavoidable adverse environmental impacts identified above may be considered "acceptable" due to the following specific considerations, which outweigh the unavoidable, adverse environmental impacts of the project. Each of the separate benefits of the project, as stated herein, is determined to be, unto itself and independent of the other project benefits, a basis for overriding all unavoidable adverse environmental impacts identified above. Project benefits include:

Implements the Objectives Established for the Project

The objectives of the General Plan Update would guide development in the City in a way that would improve the economic viability of and allow for growth in the City while reducing environmental impacts. The City established the following guiding vision and objectives for the Industry General Update to aid decision-makers in their review of the project and associated environmental impacts:

Guiding Vision: Be an employment base and commercial and business hub for the San Gabriel Valley and Los Angeles metropolitan area.

- Maintain a diverse and prosperous economy consisting of a variety of industrial, professional, and commercial uses.
- Achieve a sustained economic viability that provides a tax base supportive of the City's growth potential, maintains fiscal viability, and funds capital improvement programs that serve present and future businesses.
- Provide the flexibility to respond to changing market conditions.
- Enhance the value of businesses and properties within the City such that additional investment is stimulated by providing a quality level of services, safety, security, infrastructure, and design.
- Achieve a professional appearance in the City marked by a functional quality in its buildings and structures, landscaping, signage, and utilities and infrastructure systems.
- Provide prudent public ownership and timely disposition of strategic properties to achieve the City's economic development and revitalization goals.
- Provide infrastructure and circulation systems that are properly sized to support future growth and are maintained in a timely fashion.
- Support the surrounding population through sponsorship of community-building programs, such as the Youth Activities League, and through a development review process that considers our neighbors and non-business uses.

Improves the Jobs-Housing Balance in the Region

As noted above, the City's guiding vision is to be an employment base and commercial and business hub for the San Gabriel Valley and Los Angeles metropolitan area. Without the City, the Southern California Association of Governments (SCAG) projections for housing and employment in the region show a jobs/housing balance of approximately 1.28 jobs per housing unit in 2020 and 2030. The California Department of Finance provides a quantitative definition by estimating that a healthy jobs/housing balance is one new home built for every 1.5 jobs created. Without the City, the San Gabriel Valley Council of Governments (SGVCOG) subregion is housing rich. With the City, the jobs/housing balance improves to approximately 1.46 in 2020 and 1.44 in 2030, which are both considered to be healthy jobs/housing balances.

Theoretical buildout of the City under the General Plan Update would add approximately 108,008 new jobs in the SGVCOG subregion through the variety of professional and employment-generating uses that would be accommodated by the General Plan Update. With implementation of the General Plan Update, the projected 2035 jobs/housing balance in the SGVCOG subregion changes from 1.43 to 1.46, a slight improvement. The existing and future non-residential land uses in the City

generate employment opportunities that help balance the residential communities in the SGVCOG subregion. The employment-generating land uses in the City are part of a regional approach to improving the jobs/housing balance and thereby, providing a more balanced distribution of housing and employment opportunities in the SGVCOG subregion. More employment opportunities in the City would also reduce the need for people in the SGVCOG subregion to travel further west to other parts of Los Angeles County or south to Orange County to work. This not only helps create a more sustainable economy in the SGVCOG subregion, but also helps reduce total vehicle miles traveled of the subregion, which in turn improves air quality and reduces GHG emissions.

Maintain and Enhance the Economic Vitality of the San Gabriel Valley Subregion

By increasing its development potential under the General Plan Update, the City would be able to attract a wide variety of professional and employment-generating uses, which in turn would lead to a greater variety of jobs and wider range of salaries available to residents of the SGVCOG subregion. As noted above, theoretical buildout of the City under the General Plan Update would add approximately 108,008 new jobs in the SGVCOG subregion through the variety of professional and employment-generating uses that would be accommodated by the General Plan Update. In addition to the permanent jobs, many construction jobs would also be created through development projects that would be accommodated by the General Plan Update. Creating greater employment opportunities within the City is an economic goal, consistent with the City's General Plan Update.

The location of the City is also ideal for increased employment opportunities that would be generated by future development that would be accommodated by the General Plan Update, as it is located within the housing-rich SGVCOG subregion. It is important to the City of Industry to maintain a healthy job industry in the SGVCOG subregion and to get and keep people working.

Additionally, future development that would be accommodated by the General Plan Update would provide substantial revenue for the City through the generation of sales tax; property tax; and other taxes, licenses and fees. These revenues will provide a funding source for the construction, operation and maintenance of a number of essential City services, programs and facilities, including fire and police services, transit operations, public infrastructure such as sanitary sewer service, and administrative functions, among other things. Future development would also generate significant revenue for Los Angeles County and would generate enough revenue to offset any costs related to increased demand for county services.

Represents a Guiding Framework for Future Development

SCAG projects Los Angeles County's population to increase from its current population of approximately 10.4 million to approximately 11.4 million in 2035, an increase of approximately 10 percent. This increase will require development and redevelopment throughout the county (including Industry) to accommodate housing, employment, and public service needs. Development in Industry is inevitable. The General Plan Update would shape and help implement the development of future professional and employment-generating uses in the City and thereby, provide additional employment opportunities for the anticipated population growth of Los Angeles County; specifically, for the SGVCOG subregion. Additionally, the General Plan Update plans for the next 25 years or more into the future, defining a path that recognizes the City's many assets, including its established presence as the commercial and business hub for the San Gabriel Valley and Los Angeles metropolitan area. The General Plan Update also encourages businesses to thrive and expand.

The General Plan Update would also help create compatibility between the existing and proposed land uses. Without a comprehensive guiding framework of planning principles to outline development throughout the City and concentrate development within targeted areas, development would occur without consistent guidance and goals. The General Plan Update would help maintain

balanced land uses; the phasing of development to ensure appropriate timing, placement, and provision of infrastructure, utilities and service systems, and public services; and create a stronger sense of community than would occur without this type of planning document. The General Plan Update will also regulate non-residential development so that the intensity of such development is appropriate to the property and to surrounding properties. Additionally, the City finds that the General Plan Update is desirable and necessary, as it provides a more environmentally sustainable vision and development plan for the City than the previously adopted General Plan.

The General Plan Update will provide the City, its residents, land owners and businesses, staff and policy makers and all stakeholders with a comprehensive, long-range policy guideline and framework for future development. Furthermore, the General Plan Update is more than just a set of goals and policies and an accompanying land use plan; it has components that are meant to guide government and community interaction and maintain the future sustainability of the City's economic, physical, and social development goals and health. Through the continual upkeep of the General Plan Update, development throughout all of Industry would be comprehensive and unified.

Implementation of the Policies in the Industry General Plan Update Would Improve Quality of Life and the Physical Environment

Although future development in Industry that would be accommodated by the General Plan update would have significant unavoidable impacts on the environment (such as those on air quality, greenhouse gas emissions, noise, and transportation), a number of the policies outlined in the General Plan Update would reduce these impacts on the environment and promote more environmentally sustainable development than would otherwise result in the development of Industry. The types of policies include those that:

- Preserve cultural and historic resources (RM5-1 through RM5-3)
- Manage the roadway network and encourage multimodal and complete streets system of transportation (C1-1 through C4-3)
- Maintain and conserve natural resources (LU2-6, RM1-2, RM1-3, RM1-7, RM2-2, RM2-3, and RM3-1)
- Encourage health and wellness (LU3-1, LU3-2, C2-1, C2-2, C2-4 through C2-6, C2-8, C3-1, RM2-1 through RM2-4, RM3-1, RM3-3, RM3-5, S4-2, S4-3, and S6-1 through S6-3)
- Improve air quality and reduce greenhouse gas emissions (LU2-6, LU3-1, C1-3, C2-2, C2-4, C2-5, C2-6, C2-8, C3-1, RM2-1 through RM2-4, RM3-1, RM3-3, RM3-5, S4-2, S4-3, S6-1 through S6-3)
- Promote water quality and preservation (LU2-6 and RM1-2 through RM1-8)

CONCLUSION

The City of Industry City Council has balanced the project's benefits against the project's significant unavoidable impacts. The City Council finds that the project's regional and local benefits outweigh the project's significant unavoidable impacts, and those impacts, therefore, are considered acceptable in light of the project's benefits. The City Council finds that each of the benefits described above is an overriding consideration, independent of the other benefits, that warrants approval of the project notwithstanding the project's significant unavoidable impacts.