August 2020 | Initial Study

13055 TEMPLE AVENUE INDUSTRIAL DEVELOPMENT

City of Industry

Volume I: Initial Study

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PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
AQMP	air quality management plan
BMP	best management practices
CAFE	corporate average fuel economy
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gases
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
LACoFD	Los Angeles County Fire Department
LASD	Los Angeles County Sheriff 's Department

Abbreviations and Acronyms

LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
mgd	million gallons per day
MT	metric ton
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
ppm	parts per million
PPV	peak particle velocity
REC	recognized environmental condition
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWPPP	Storm Water Pollution Prevention Plan
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound

1. Introduction

The project applicant, O.C. Design & Engineering, is seeking approval of the City of Industry ("City") for the demolition of 52,182-square feet of industrial buildings and accessory storage structures, and the development of a 70,877 square-foot industrial building (the proposed project) on a 3.53-acre site, in the northwestern portion of the City.

The City will serve as the Lead Agency for the proposed project in accordance with the California Environmental Quality Act (CEQA), Section 15051(c). This Initial Study is a preliminary evaluation of the potential environmental consequences associated with the proposed project. As part of the City's approval process, the proposed project is required to undergo an environmental review pursuant to CEQA. The lead agency uses the initial study analysis to determine whether an environmental impact report (EIR) or a negative declaration (ND) is required. If the initial study concludes that the project may have a significant effect on the environment, an EIR must be prepared. Otherwise, a ND or mitigated negative declaration (MND) is prepared

1.1 PROJECT LOCATION

The project site (APN: 8564-011-016) is located at 13055 East Temple Avenue in the northwest part of the City of Industry, Los Angeles County, California (See Figure 1, *Regional Location*). The City is surrounded by unincorporated Hacienda Heights and Rowland Heights to the south, and unincorporated South San Jose Hills, and the City of La Puente to the north. The project site is bounded by East Temple Avenue to the east, railroad tracks to the north and west, and adjacent industrial uses to the south. Regional access to the project site is via Interstate 605 (I-605) and Interstate 10 (I-10), located approximately 0.2 miles to the west and 0.5 miles to the north, respectively (See Figure 2, *Local Vicinity* and Figure 3, *Aerial Photograph*).

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

The project site is approximately 3.53 acres in size and is currently developed with a 52,182 square-foot industrial building located on the center of the project site, and seven above ground storage tanks and a silo in the rear, adjacent to the railroad tracks. Built in the 1970s, the building is currently vacant and was used for production, laboratory, storage and office operations for ink manufacturing until 2018. The project site also contains a railroad spur that extends to the northern portion of the site, and seven raised tanks and a silo in the rear of the property. The property is located at an elevation of approximately 300 feet above mean sea level (MSL). There are currently 43 parking spaces and 4,440 square feet of landscaping. Access to the project site is provided via a driveway on East Temple Avenue.

The industrial building housed production, laboratory, storage and office operations for ink manufacturing. Major operations conducted at the facility consisted of ink manufacturing, including raw material and product

receiving, product processing, and product container filling, transferring, and shipping. The tank farm to the north was used to store ink and vegetable-based oils. The two sets of train tracks that run through the northern portion of the property, include an in-ground offloading device set into the train track area by the warehouse for the offloading of carbon black, an outdoor hopper for the storage of carbon black, and a loading and loading dock area for the loading of ink products and the offloading of raw materials. According to the Phase I Environmental Site Assessment, prepared by Advanced Geo Environmental for the proposed project, the tank farm consists of four-50,000 gallon above ground storage tanks (ASTs) and three-20,000-gallon ASTs. The ASTs and the associated above ground piping to transfer the materials are located within bermed concrete. The size and historic uses of the seven storage tanks are shown in Table 1-1, *Historic Use of Tank Farm*:

Table 1-1 Historic Use of Storage Tanks

Numbers and Size	Contents	Secondary Containment	Notes
3 x 20,000	CLK – 290, CLK – 272 and CLK – 169	Yes – Concrete Berm	Finished ink storage
1 x 50,000	Medium oil	Yes – Concrete Berm	Oil storage tank
1 x 50,000	Empty	Yes – Concrete Berm	Oil storage tank
2 x 50,000	Medium oil and soy oil	Yes – Concrete Berm	Raw material storage

1.2.1.1 HISTORIC ENVIRONMENTAL CONDITIONS

The property is currently undergoing decommissioning and the ink production machinery is being removed, with Los Angeles City acting as the Certified Unified Program Agency (CUPA). The site has been vacated since 2018, previously the property was used for manufacturing paint and pigments for the print industry. The project site was listed with regulatory agencies from 1980 to 2018 as a large quantity generator of aqueous solution with organic residue, aqueous solution, off-specification, aged or surplus organics, oil containing waste, organic solids, ignitable waste, mercury, methyl ethyl ketone and corrosive waste. The facility processed waste water from ink manufacturing which was stored in an 8,000-gallon UST located northwest of the building. The UST was used from 1968 until 1983 and was removed in 1990 under regulatory guidance. Also, in 1990, a 10,000-gallon diesel fuel UST was removed from the property. This tank was a hazardous waste management unit (HWMU) which was excavated and removed under the Los Angeles Regional Water Quality Control Board (LAWQRCB) oversight on March 27, 1990. A "no further action" letter was issued to Flint Facility by the LAWQCB on October 12, 2004. The Department of Toxic Substances Control conducted a visual site inspection (VSI) on May 10, 2001. A RCRA Facility Assessment (RFA) incorporating the findings of the VSI was completed in June 2004. In relation to the closure of the ink manufacturing facility, the project site recently had extensive environmental investigations performed under the oversight of the California Department of Toxic Substances Control (DTSC). On November 19, 2019, DTSC issued a Notice of Final Decision for the Corrective Action Completion with Controls for the project site, stating that the Land Use Covenant restricting the site to commercial and industrial uses was appropriate. Refer to Section 3.9, Hazards for more details

regarding the project site's potential to create an adverse effect due to hazardous conditions or release of hazardous materials.

1.2.2 Surrounding Land Use

The project site is primarily surrounded by industrial uses. Directly to the northeast of the project site is vacant land with industrial uses further north across the railroad. To the southeast are industrial buildings across East Temple Avenue and industrial buildings to the southwest with the I-605 further west. Directly to the northwest are the railroad track with industrial uses beyond. Walnut Creek, a tributary of the San Gabriel River Channel is also located approximately 500 feet to the north beyond the industrial uses. West of the I-605 are commercial and industrial uses located in the City of Baldwin Park, while residential uses are located north of Walnut Creek.

1. Introduction

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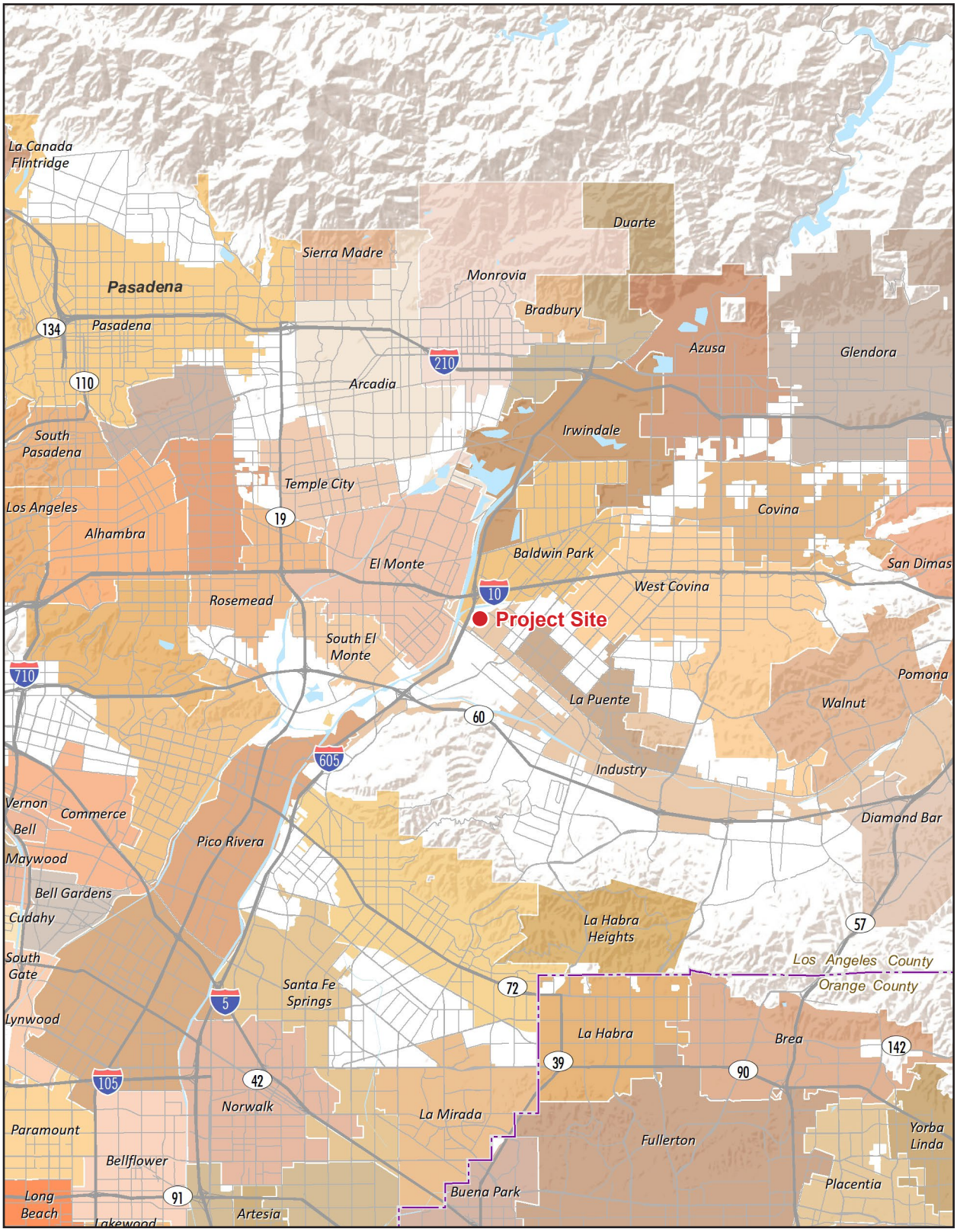
Figure 1 - Regional Location

1. Introduction



Note: Unincorporated county areas are shown in white.

Source: ESRI, 2020

0 3
Scale (Miles)

1. Introduction

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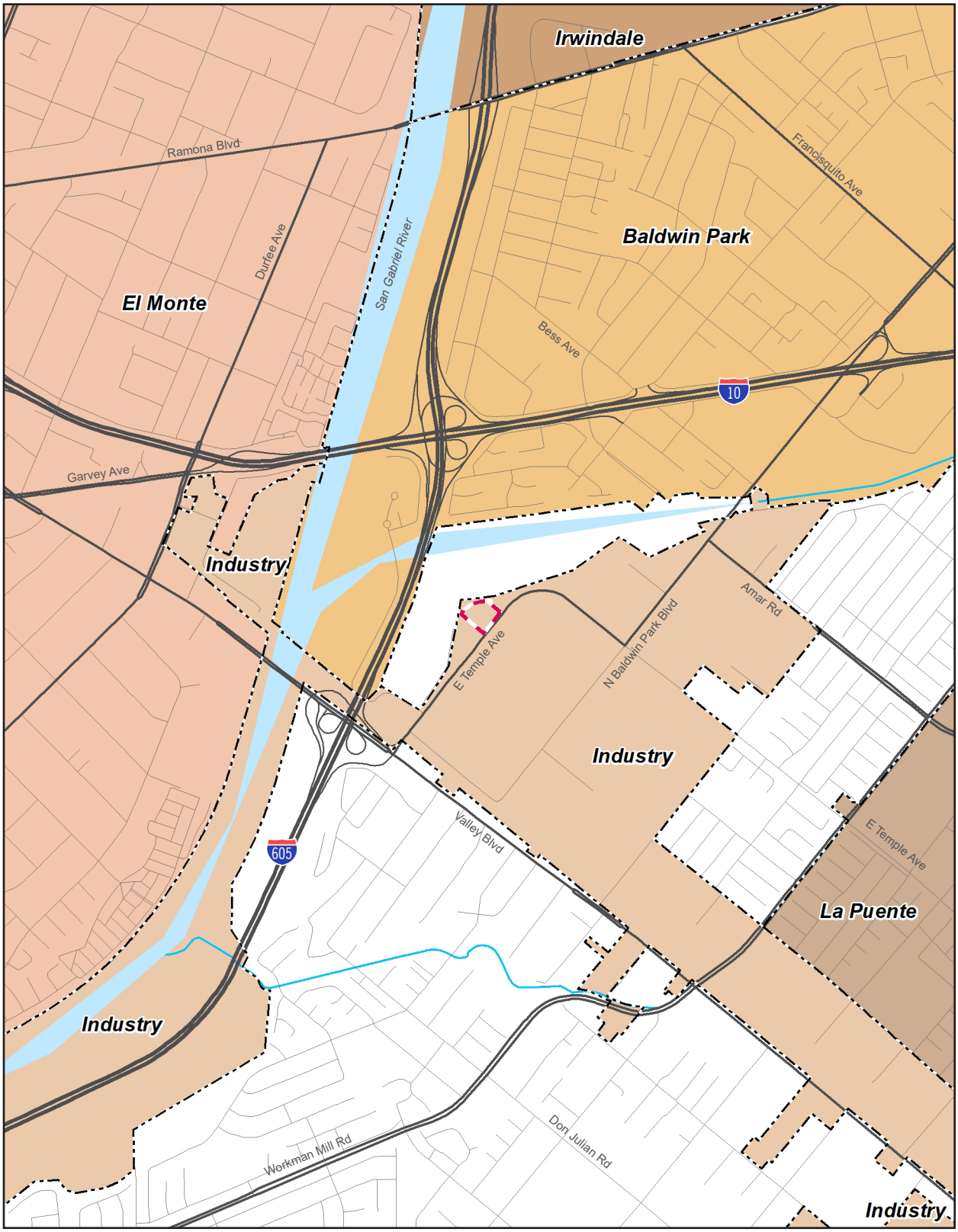
Figure 2 - Local Vicinity



Project Boundary

0 2,000
Scale (Feet)

Source: ESRI, 2020

1. Introduction

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Figure 3 - Aerial Photograph

1. Introduction

Project Boundary

0 150
Scale (Feet)

Source: Nearmap, 2020

1. Introduction

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1.3 PROJECT DESCRIPTION

1.3.1 Proposed Land Use

The proposed project involves the demolition of all existing structures, and the development of a 76,877 square foot industrial building. As shown in Table 1-2, *Proposed Development*, the new building is two stories, with 67,383 square feet of warehouse space and 3,000 square feet of office space, for a total of 70,383 square feet on the first floor, and 3,494 square feet of storage space and 3,000 square feet of office space for a total of 6,494 square feet on the mezzanine level. The proposed project also includes approximately 18,451 square feet of landscaping with chain link fencing on the northern, eastern and western boundaries of the project site. Figure 4, *Proposed Site Plan*, illustrates the proposed development on the project site.

Table 1-2 Proposed Development

	Proposed Uses	Size
First Floor	Warehouse	67,383 sf
	Office	3,000 sf
	First Floor Subtotal	**70,383 sf**
Mezzanine	Storage	3,494 sf
	Office	3,000 sf
	Mezzanine Subtotal	**6,494 sf**
Total Building Area		**76,877 sf**
Other:	Landscaping	18,451 sf

Sf=square feet

Access to the project site is provided by two 40-foot wide driveways via East Temple Avenue. The loading dock is located on the northeast portion of the project site with seven 9-foot by 10–foot dock high doors and two 12-foot by 14-foot grade level truck doors. As shown in the Table 1-3, *Proposed Parking*, a total of 119 spaces are provided, with 10 of these spaces serving as visitor parking. Two bicycle racks are provided with six short term spaces at the front entrance of the building and 6 long term spaces inside the building near the loading dock. The proposed project will also include a fire lane and concrete walkways with pedestrian access via East Temple Avenue.

Table 1-3 Proposed Parking

Type	Number of Spaces
Accessible	3
Van Accessible	2
Standard	75
Clean Air	11
Electric Vehicle Capable	7
Compact	21
Total	**119**

1.3.2 Project Phasing

Construction activities are anticipated to begin in Fall 2020. The construction would be completed in one phase, lasting approximately 8 months, and include the following activities: demolition of existing structures, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, landscaping, and street connection improvements. Grading activities would result in the disturbance of approximately 5.53 acres of area and would result in a balanced site (cut and fill) with no importing or exporting of soils.

1.4 EXISTING ZONING AND GENERAL PLAN

The project site is zoned Industrial and has a General Plan designation of Employment (Industry 2019; 2014).

The proposed project's industrial use would be allowed under existing zoning and General Plan designations. Additional approvals required from the City currently in process include:

- Development Plan Application

1.5 OTHER AGENCY ACTION REQUESTED

REGIONAL AGENCIES

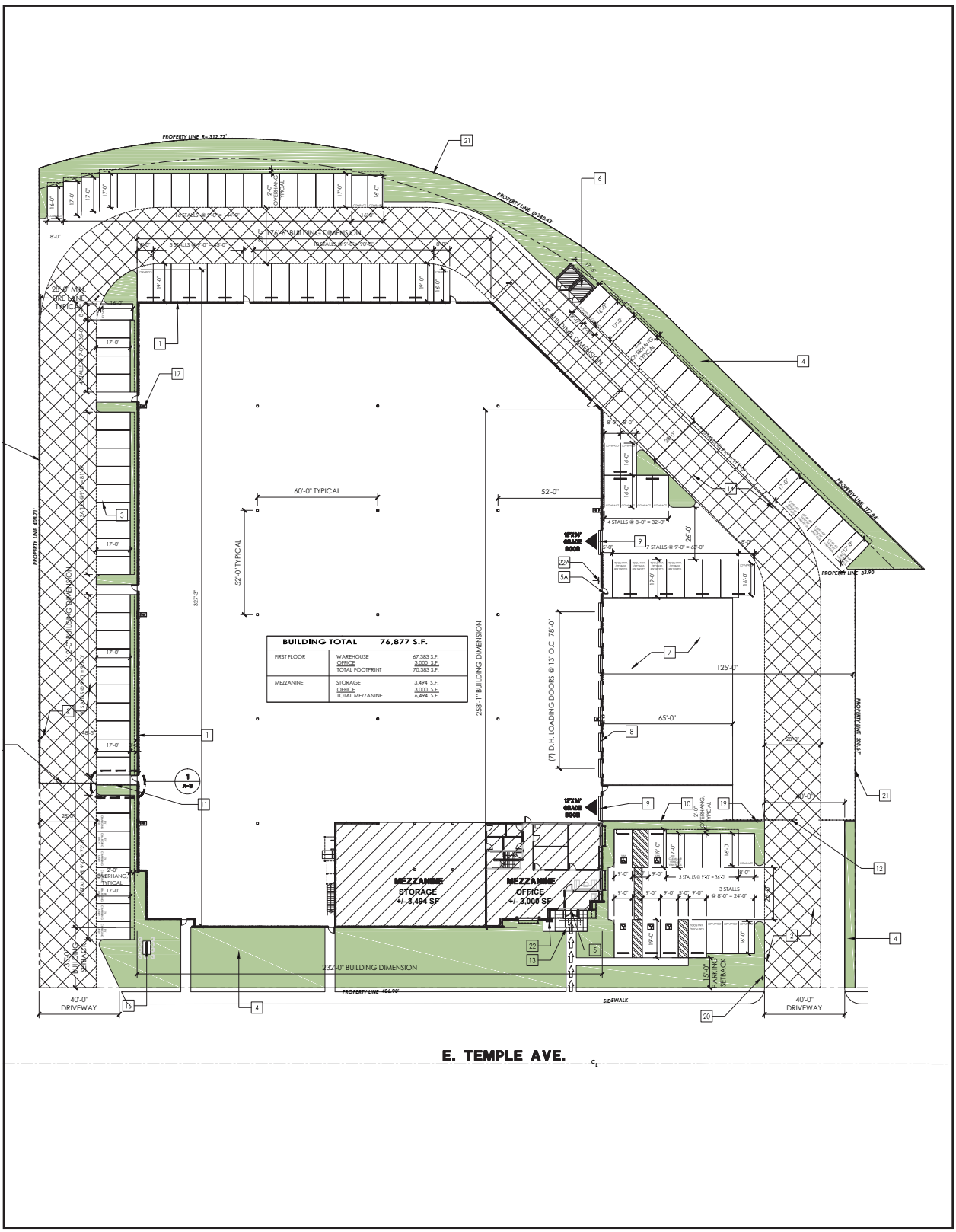
- Los Angeles Regional Water Quality Control Board (NPDES permit; construction storm water run-off
- permits, Storm Drain MS4 Permit)
- South Coast Air Quality Management District – Rule 201: Permit to construct
- Los Angeles County Fire Department (for emergency site access review)
- Los Angeles County Building Department (site plan review)

LOCAL AGENCIES

- City of Industry Public Works/Engineering (for grading permit)

Figure 4 - Proposed Site Plan

1. Introduction



0 70
Scale (Feet)

Source: OC Design and Engineering, 2020

1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** 13055 Temple Avenue Industrial Development

2. **Lead Agency Name and Address:**
City of Industry
15625 East Stafford Street, Suite 100
City of Industry, CA 91744

3. **Contact Person and Phone Number:**
Kathy Tai
626.333.2211

4. **Project Location:** The project site (APN: 8564-011-016) is located at 13055 East Temple Avenue in the northwest part of the City of Industry, Los Angeles County, California (See Figure 1, *Regional Location*). The City is surrounded by unincorporated Hacienda Heights and Rowland Heights to the south, and unincorporated South San Jose Hills, and the City of La Puente to the north. The project site is bounded by East Temple Avenue to the east, railroad tracks to the north and west, and adjacent industrial uses to the south. Regional access to the project site is via Interstate 605 (I-605) and Interstate 10 (I-10), located approximately 0.2 miles to the west and 0.5 miles to the north, respectively.

5. **Project Sponsor's Name and Address:**
Ignacio Crespo
7901 Crossway Drive
Pico Rivera, CA 90660

6. **General Plan Designation:** Employment

7. **Zoning:** Industrial

8. **Description of Project:**
The proposed project involves the demolition of 52,182-square feet of industrial buildings and all existing accessory storage structures, and the development of a 76,877 square feet industrial building. As shown in Table 1-2, Proposed Development, the new building consists of 67,383 square feet of warehouse space and 3,000 square feet of office space for a total of 70,383 square feet on the first floor, and 3,494 square feet of storage space and 3,000 square feet of office space for a total of 6,494 square feet on the mezzanine level. The proposed project also includes approximately 18,451 square feet of landscaping with chain link fencing on the northern, eastern and western boundaries of the project site.

2. Environmental Checklist

9. Surrounding Land Uses and Setting:

The project site is primarily surrounded by industrial uses. Directly to the northeast of the project site is vacant land with industrial uses further north across the railroad. To the southeast are industrial buildings across East Temple Avenue and industrial buildings to the southwest with the I-605 further west. Directly to the northwest are the railroad track with industrial uses beyond. The San Gabriel River Channel is also located approximately 500 feet to the north beyond the industrial uses.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

- Los Angeles Regional Water Quality Control Board (NPDES permit; construction storm water run-off permits, storm Drain MS4 Permit
- South Coast Air Quality Management District – Rule 201: Permit to construct
- City of Industry Public Works/Engineering (for grading permit)
- Los Angeles County Fire Department (for emergency site access review)
- Los Angeles County Building Department (site plan review)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The Soboba Band of Luiseno Indians and the Gabrieleño Band of Mission Indians – Kizh Nation are on the City's notification list pursuant to AB 52. The City prepared notification letters and distributed them to the identified tribal representatives on April 9, 2020. No reply has been received for either tribe as of the publication date of this MND and no further action is required.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature *Date*

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) **Earlier Analyses Used.** Identify and state where they are available for review.

   b) I**mpacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

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

Except as provided in Public Resources Code Section 21099, would the project:

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

Less Than Significant Impact. Scenic vistas are panoramic views of features such as mountains, forests, the ocean, or urban skylines. The City's physical setting in the Los Angeles River Basin region, and relatively flat topography, afford distant scenic views of the San Gabriel Mountains and Puente Hills from certain vantage points throughout the City. The Puente Hills are located approximately 2.5 miles south of the project site, though scenic views of these hills are limited and largely obstructed by surrounding development. The San Gabriel Mountains, located approximately 7 miles to the north, are moderately visible in the background from much of the site; however distinct views of the mountains are interrupted due to the intervening industrial development, transportation and power infrastructure located in the immediate foreground of the project site. Project development would not result in a substantial adverse effect on a scenic vista of these scenic resources, as there are no such vistas offered from the project site or its surroundings.

As shown in Figure 3, *Aerial Photograph*, the project site and surrounding area are in a highly industrialized area of the City. The project area is primarily dominated by industrial uses and the urban landscape character and features of the project site and surrounding area are consistent with and typical of areas of the City with the

3. Environmental Analysis

Industrial zoning designation. The project site and its surrounding area do not exhibit any significant visual resources or scenic vistas. There are no unimpeded views of scenic landforms (e.g., mountains, hills, creeks) from the project site or surrounding area; and no scenic landforms are on or within proximity of the project site. The San Jose Creek Channel is concrete lined, is not considered a scenic resource and is obstructed from view on the project site by distance and intervening structures. Also, there are no designated open space resources onsite or in the vicinity of the project site, a designation typically used to determine the value of certain public vistas in order to gauge adverse effects.

Based on the preceding, impact to scenic vistas would be less than significant and no mitigation measures are necessary.

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

No Impact. A scenic highway is generally considered a stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency. Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality.

The project site is in a highly industrialized area of the City and is not on or near a state-designated scenic highway, as designated on the California Scenic Highway Mapping System of the California Department of Transportation. Additionally, the project site is not visible from the nearest state-designated scenic highway (Angeles Crest Highway), which is approximately 16 miles to the northwest (Caltrans 2020). Therefore, no impact to scenic resources would occur due to project development and no mitigation measures are necessary.

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

No Impact. The project site is in an area that qualifies as an "urbanized area" and is surrounded by industrial uses.[1] The proposed project develops an industrial building with landscaping and parking, conforming with the appearance of the existing uses on site, as well as the surrounding industrial uses. The design of the project conforms to the City's requirements relating to height and setback and is therefore consistent with the Industrial zoning of the project site, and with the surroundings area. No changes to the zoning code or general plan land use designation are required. The proposed project does conflict with applicable zoning or regulations governing scenic quality. Therefore, no impact would occur.

[1] PRC § 21071/CEQA Guidelines § 15191(m)(1) for an incorporated city "Urbanized area" means the city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. City of Industry has a population of about 440 [2017 California Department of Finance Estimate]. Together with Hacienda Heights (54,038) and Rowland Heights (48,993), the total population is 103,471 [US Census 2010].
https://www.cityofindustry.org/about-industry/facts-about-the-city;
https://www.census.gov/quickfacts/fact/table/rowlandheightscdpcalifornia,haciendaheightscdpcalifornia/PST045219

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. As shown in Figure 3, *Aerial Photograph*, the project site is in a highly industrialized area of the City and is surrounded by industrial uses, which are not considered light-sensitive receptors (land uses that are sensitive to lighting). Project development would introduce new sources of artificial light to the project site and surrounding area. Nighttime site lighting would include exterior building-mounted light fixtures; interior lighting for the new building; lighting for the new parking and loading dock areas; and security lighting, similar to the existing industrial uses on-site. Although project development would introduce new artificial light sources to the project site and surrounding area, the proposed light sources would be similar to the light sources of the existing industrial uses on-site, as well as those of the surrounding industrial uses and roadways. Considering the existing sources of lighting in the surrounding vicinity, the amount and intensity of nighttime lighting proposed onsite would not be substantially greater or different than existing lighting. Therefore, project impacts associated with light and glare would be less than significant and no mitigation measures are necessary.

3.2 AGRICULTURE AND FORESTRY RESOURCES

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. **In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				X
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

3. Environmental Analysis

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

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

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

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

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

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

a) – e) No Impact. The following analysis addresses environmental checklist questions a) through e) for Agriculture and Forestry Resources. The California Department of Conservation manages the Farmland Mapping and Monitoring Program (FMMP), which identifies and maps significant farmland. Farmland is classified using a system of five categories including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service (NRCS). The California Department of Conservation manages an interactive website, the California Important Farmland Finder. The project site is mapped as Urban and Built-Up Land, and not as farmland on the California Important Farmland Finder (DLRP 2016).

The project site is previously developed land, was previously used for production, laboratory, storage and office operations for ink manufacturing, and is not used, zoned, or designated for agriculture. No designated forest land exists on the project site, or within the City, and the proposed project would not result in the loss of forest land. The project site is not subject to a Williamson Act contract, and the site is zoned as Industrial in the City's Zoning Map. This zoning district is not intended for agricultural uses. Additionally, the project site is not adjacent to or within the vicinity of any farmland. Therefore, project development would not convert mapped important farmland to non-agricultural uses, and no impact to agriculture or forestry resources would occur.

3.3 AIR QUALITY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2017b).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_X, PM_{10}, and $PM_{2.5}$. Projects below the regional significance thresholds are small enough that their regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation; and therefore, would not result in significant health-based air quality impacts. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations. Would the project:

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

3. Environmental Analysis

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

Less Than Significant Impact. The South Coast AQMD adopted the 2016 Air Quality Management Plan on March 3, 2017. Regional growth projections are used by the South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of General Plans, specific plans, and significant projects.

Section 15206(b) of the CEQA Guidelines states that a proposed project is of statewide, regional, or area-wide significance if a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area. The proposed project would demolish the existing 52,182 square foot warehouse and construct a new 76,877 square foot warehouse for a net increase of 24,695 square feet. Thus, it is not considered a project of statewide, regional, or areawide significance that would require intergovernmental review under Section 15206 of the CEQA Guidelines. Therefore, the project would not have the potential to substantially affect SCAG's demographic projections. Additionally, as demonstrated below in Section 3.3(b), the regional emissions that would be generated by the operational phase of the proposed project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by the South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts would be less than significant.

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

Less Than Significant Impact. The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the proposed project.

Regional Short-Term Construction Impacts

The proposed project would result in the construction of a 76,877 square foot warehouse that would take approximately nine months to construct. Construction of the proposed project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from demolition, site preparation, grading, building construction of the housing units, architectural coating, and asphalt pavement. The proposed project construction-related emissions shown in Table 3-1, *Maximum Daily Regional Construction Emissions*, are quantified using California Emissions Estimator Model, Version 2016.3.2.25 (CalEEMod), and are based on the construction schedule and equipment mix for the project provided by the Applicant. As shown in the table, air pollutant emissions from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant.

Table 3-1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day)[1, 2,]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2020						
Building Demolition	3	32	21	<1	2	1
Building Demolition and Hauling	0	1	<1	<1	<1	<1
Building Demolition and Building Demolition Hauling	3	32	21	<1	2	1
Rough Grading	4	41	28	<1	3	2
Site Preparation and Fine Grading	2	18	15	<1	1	1
Warehouse Construction	2	24	15	<1	1	1
Utility Trenching	1	9	7	<1	<1	<1
Site Preparation and Fine Grading and Warehouse Construction	4	42	30	<1	2	1
Warehouse Construction and Utility Trenching	3	33	22	<1	2	1
Year 2021						
Warehouse Construction	2	21	14	<1	1	1
Architectural Coating (Warehouse)	5	2	2	<1	<1	<1
Asphalt Paving	1	8	6	<1	<1	<1
Finish/Landscaping	1	6	5	<1	<1	<1
Architectural Coating and Asphalt Paving	8	23	16	<1	1	1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	8	42	30	<1	3	2
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.
Emissions totals may not equal 100 percent due to rounding.
[1] Based on the preliminary information provided by the Applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on information provided by the Applicant and CalEEMod defaults. CalEEMod defaults are based on construction surveys conducted by the South Coast AQMD of construction equipment.
[2] Includes implementation of fugitive dust control measures required by the South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

Regional Long-Term Operation-Phase Impacts

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The proposed project would result in new warehouse with paved and landscaped surfaces. As stated, the proposed project would replace the existing use and would result in a net increase in industrial space by 24,695 square feet. The proposed building would, at minimum, be designed and built to meet the 2019 Building Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen), which would result in the new proposed building being more energy efficient than the existing building it would replace. As shown in Table 3-2, *Net Maximum Daily Regional Operation Emissions*, it is anticipated that the net increase in long-term emissions from operation of the proposed project would be minimal and would not exceed the South Coast AQMD regional operation-phase significance thresholds, as compared to baseline

emissions in 2021. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

Table 3-2 Net Maximum Daily Regional Operation Emissions

Source	Pollutants (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.}$
Proposed Project Emissions[3]						
Area	1	<1	<1	0	<1	<1
Energy[1]	<1	<1	<1	<1	<1	<1
Off-Road Equipment	1	8	8	<1	1	<1
Mobile – Passenger Vehicle	<1	<1	1	<1	<1	<1
Mobile - Trucks	<1	6	1	<1	<1	<1
Total	2	13	10	<1	2	1
South Coast AQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25. Highest winter or summer emissions report.
Notes: lbs: Pounds.
[1] For purposes of this analysis, the proposed warehouse is assumed to be designed and built to meet the 2019 Building Efficiency Standards and CALGreen Code based on information provided by the Applicant.
[2] Net emissions compare the proposed project emissions to a baseline "no project" scenario in the buildout year of 2021.
[3] Based on the net difference in square footage between the existing building and the new proposed building.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The following describes changes in localized impacts from short-term construction activities and long-term operation of the proposed project.

Construction

Localized Construction Impacts

A project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevated levels. Unlike the mass of construction emissions shown in the regional emissions analysis in Table 3-1 which is described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects. The screening-level localized significance thresholds (LSTs) are the amount of project-related emissions at which localized concentrations (ppm or $\mu g/m^3$) could exceed the California AAQSs for criteria air pollutants for which the SoCAB is designated nonattainment and are based on the proposed project site size and distance to the nearest sensitive receptor. The California AAQS, which are the most stringent AAQS, were established to provide a margin of safety in the protection of the public health and welfare. The screening-level LSTs are designed to protect sensitive receptor areas most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.

Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 3-3, *Construction Emissions Compared to the Screening-Level LSTs*, shows the

maximum daily construction emissions (pounds per day) generated during onsite construction activities compared with the South Coast AQMD's screening-level LSTs, for sensitive receptors within 82 feet (25 meters/non-residential) and 1,130 feet (344 meters/residential). The nearest non-residential receptors are within 82 feet of the project site and the nearest residential receptors are 1,130 feet from the project site. Because NO_x and CO pollutants are based on 8-hour standards, the distance of 82 feet is used to determine the screening-level LSTs for non-residential receptors, assuming non-residential sensitive receptors are typically exposed to 8 hours (a typical workday) to pollutants. Similarly, because PM_{10} and $PM_{2.5}$ are based on a 24-hour standard, the distance of 1,130 feet (344 meters) is used to determine the screening-level LSTs, assuming residential receptors would have people residing in their homes potentially 24 hours. As shown in the table, the construction of the proposed project would not generate construction-related onsite emissions that would exceed the screening-level LSTs, therefore, impacts would be less than significant.

Table 3-3 Construction Emissions Compared to the Screening-Level LSTs

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD ≤1.00 -acre LST	83	673	105	50
Building Demolition	30	20	1	1
Building Demolition Haul	0	0	<1	<1
Site Preparation and Fine Grading	16	14	1	1
Warehouse Construction – 2020	21	13	1	1
Warehouse Construction – 2021	18	12	1	1
Utility Trenching - 2020	8	7	<1	<1
Architectural Coating – 2021	1	2	0	0
Asphalt Paving – 2021	6	5	<1	<1
Finish and Landscaping -2021	5	4	<1	<1
Building Demolition and Demolition Haul – 2020	30	20	2	1
Site Preparation and Fine Grading and Warehouse Construction – 2020	37	27	1	1
Warehouse Construction and Utility Trenching – 2020	29	20	1	1
Architectural Coating and Asphalt Paving - 2021	8	7	<1	<1
Exceeds LST?	No	No	No	No
South Coast AQMD 2.5-Acre LSTs	131	1,161	117	57
Rough Grading – 2020	40	27	2	1
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.25, and South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the project site are included in the analysis. The screening-level NO_X and CO LSTs are based on non-residential receptors within 82 feet (25 meters) of the project site in Source Receptor Area (SRA) 11. PM_{10} and $PM_{2.5}$ screening-level LSTs are based on a measured distance of 1,130 feet (344 meters) to the nearest residences from the project site.

1 Based on information provided by the applicant. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

3. Environmental Analysis

Health Risk

The South Coast AQMD currently does not require health risk assessments to be conducted for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM). The Office of Environmental Health Hazard Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments in March 2015 (OEHHA 2015). It has also developed a cancer risk factor and noncancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The South Coast AQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The proposed project would be developed over approximately nine months. The relatively short duration when compared to a 30-year time frame would limit exposures to on-site and off-site receptors. In addition, exhaust emissions from off-road vehicles associated with overall project-related construction activities would not exceed the screening-level LSTs. For these reasons, it is anticipated that construction emissions would not pose a threat to off-site receptors near the proposed project, and project-related construction health impacts would be less than significant.

Operation

Localized Operation-Phase Impacts

Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from South Coast AQMD include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur onsite. Onsite emissions include truck idling and operation of forklifts. Additionally, operation of the proposed project would also result in the use of standard onsite mechanical equipment such as heating, ventilation, and air conditioning units in addition to occasional use of landscaping equipment for property maintenance which would generate area source emissions. Emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at the project site (offsite mobile-source emissions are not included in the LST analysis) from onsite area sources and truck idling could expose sensitive receptors to substantial concentrations of criteria air pollutants. Table 3-4, *Localized Onsite Operational Emissions,* shows localized maximum daily operational emissions. As shown in this table, maximum daily onsite operational emissions would not exceed the screening-level LSTs. Thus, operational criteria air pollutant emissions would not exceed the California AAQS and project operation would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.

Table 3-4 Localized Onsite Operational Emissions

Source	Pollutants (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Area Sources	<1	<1	<1	<1
Truck Idling[1]	<1	<1	<1	<1
Off-Road[2]	8	8	1	<1
Maximum Daily Onsite Operation Emissions	8	8	1	<1
South Coast AQMD LST	153	1,430	30	15
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.25; SCAQMD 2008.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the proposed project site are included in the analysis. Construction NO_X and CO LSTs are based on non-residential receptors within 82 feet (25 meters) in SRA 11. Construction PM_{10} and $PM_{2.5}$ LSTs are based on residential receptors within 1,130 feet (344 meters) in SRA 11.
[1] Based on EMFAC2017 Version 1.0.2 calendar year 2021 emission rates for a diesel-powered heavy-heavy duty truck (HHDT).
[2] Assumes 7 diesel-powered forklifts at the facility operating for 4 hours per each shift and a total of 2 work-shifts per day.

Heath Risk

There is a direct association between proximity to distribution centers and a variety of health effects, which are attributed to a high concentration of air pollutants generated by activities associated with the operation of distribution centers. Because placement of sensitive land uses falls outside of the California Air Resources Board's (CARB) jurisdiction, CARB developed a handbook for the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities (CARB 2005). This document was developed as a guide and as a tool for assessing the compatibility and associated health risk when placing sensitive receptors near existing pollution sources.

CARB's recommendations on the siting of new sensitive land uses were developed from a compilation of recent studies that evaluated data on the adverse health effects from proximity to air pollution sources. The key observation in these studies is that close proximity to air pollution sources substantially increases both exposure and the potential for adverse health effects relative to the existing background concentrations found within the air basin. Diesel PM represents approximately 70 percent of the potential health risk from air toxics.

The association of truck-related emissions with adverse health effects is generally strongest between 300 and 1,000 feet, and diminishes with distance. The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem. CARB recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week)" to avoid exposing sensitive receptors to substantial concentration of air pollutants (CARB 2005).

The closest sensitive receptors to the project site are the residences along Farnell Street, approximately 1,130 feet north of the project site across Walnut Creek, which would fall outside of the 1,000-foot buffer distance. In addition, the proposed project is anticipated to generate only 23 trucks (i.e., 46 truck trips) per day and is substantially less than 100 trucks per day trigger that would warrant a more detailed review. Furthermore, Heavy-duty trucks at the project site are subject to CARB's In-Use Airborne Toxic Control Measure (ATCM) Rule. The ATCM prohibits drivers of diesel-fueled commercial motor vehicles from idling the vehicles' primary diesel engines for more than five minutes at any location, or idle the diesel-fueled auxiliary powered system for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if the vehicle is equipped with a sleeper berth and is located within 100 feet of a restricted area, defined as homes and schools. Idling necessary for health, safety, or operational concerns is exempt from these restrictions. With compliance of CARB Rule 2485, idling emissions from trucks associated with the project would be extremely limited and would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the proposed project would not expose sensitive receptors to substantial concentrations of toxic air contaminants.

3. Environmental Analysis

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). Operation of the proposed project would generate up to a net of 8 PM peak hour trips, which would be minimal compared to the aforementioned screening levels. Therefore, the project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project site, and impacts would be less than significant.

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

Less Than Significant Impact. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project would develop and operate warehousing space, which does not fall within the aforementioned land uses; no operational odors are anticipated.

During the development of the proposed project, emissions from construction equipment, such as diesel exhaust, may generate odors. However, these odors would be low in concentration, temporary, disperse rapidly, and are not expected to affect a substantial number of people. Any odors produced during the installation phase are not expected to be significant or highly objectionable and would be in compliance with South Coast AQMD Rule 402. Therefore, impacts would be less than significant.

3.4 BIOLOGICAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Sensitive biological resources are habitats or species that have been recognized by federal, state, and/or local agencies as being endangered, threatened, rare, or in decline throughout all or part of their historical distribution. The project site is in a highly industrialized area of the City (see Figure 3, *Aerial Photograph*) and all of the project site is developed with urban land uses. Sensitive animal and plant species have been identified within the El Monte Quadrangle, including species identified in the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB). This database lists special-status wildlife species that have historically occurred within regions of California, including City of Industry. It is important to note that the inclusion of species in the database does not mean that the listed species would occur within the project site. The potential presence of a species is dependent on the type of habitat available.

3. Environmental Analysis

The CNDDB indicates that ten threatened or endangered species located within the El Monte Quadrangle (CDFW 2020). However, most of the species are presumed extirpated (rooted and destroyed) due to the highly urbanized state of the City.

Based on the existing industrial uses located on the project site and its surroundings and views of the project site and surrounding area from Google Earth maps, project development would not have an impact on the aforementioned species since there is no suitable riparian or native habitat located within or in the vicinity of the project site and no natural biological resources or communities exist on, adjacent to, or near the project site. The aforementioned species typically require wetland or riparian habitat with native vegetation and access to bodies of water. The nearest water body to the project site is the San Jose Creek Chanel of the San Gabriel River, which passes approximately 500 feet north of the project site. The river consists of concrete bed and banks and does not support wildlife habitat.

Based on the preceding, the proposed project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. No impact would occur and no mitigation measures are necessary.

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

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. No riparian habitat or other sensitive natural communities occur in the project site (USFWS 2019). The project site is not included in local or regional plans, policies, and regulations that identify riparian habitat or other sensitive natural communities. Therefore, no impact would occur and no mitigation measures are necessary.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as streams, swamps, marshes, and bogs. No wetlands regulated by the US Army Corps of Engineers, US Fish and Wildlife Services (USFWS), California Department of Fish and Wildlife, or Los Angeles Regional Water Quality Control Board exist on the project site. The nearest water body to the project site is the San Jose Creek Chanel of the San Gabriel River, which passes approximately 500 feet north of the project site and is mapped on the USFWS National Wetlands Mapper as Riverine habitat, Freshwater Forested/Shrub Wetland, and Freshwater Emergent Wetland (USFWS 2019). However, the channel consists of concrete bed and banks and therefore, does not support wetland resources such as saturated soil or wetland vegetation. Project implementation would also not

involve direct removal, filling, hydrological interruption, or other direct or indirect impact to wetlands under jurisdiction of regulatory agencies. Therefore, no impact would occur and no mitigation measures are necessary.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The project site is almost entirely developed and is surrounded by developed urban uses. Thus, the project site is not available for overland wildlife movement or migration. The project site contains a few trees along the norther perimeter of the property, but these are primarily ornamental and do not provide suitable nesting habitat for migratory birds. Project development would not substantially interfere with a wildlife corridor. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The City of Industry does not have any established ordinances protecting biological resources. Therefore, no impact would occur and no mitigation measures are necessary.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. There are no adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans that govern the project site (CDFW 2019). No impact would occur.

3.5 CULTURAL RESOURCES

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

Would the project:

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

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

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

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

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

As shown in Figure 3, *Aerial Photograph*, the project site is currently developed with a vacant industrial building, a railroad spur, seven raised tanks and a silo. The project site was previously used for production, laboratory, storage and office operations for ink manufacturing in the past. Project development would involve demolition of the vacant building and other site improvements. The building was constructed around the 1970s. The state-recommended threshold under which buildings may be considered historic resources is a construction age of 50 years (California Code of Regulations, §4852.d.2). Although the building has been standing for approximately 50 years, it is not considered historic. Neither the building or project site meet any of the state or federal criteria of a historic resource identified above. No historical events have occurred onsite or in the building, and no persons of significance have resided or currently reside onsite. Additionally, the building is of modern construction and does not exhibit any unique architectural style or features; it is a common industrial-style building design found throughout the City and greater Los Angeles County. The building does not include architectural elements or features to suggest unique design or construction.

Furthermore, the project site is not identified on any federal or state historic registers or sources, including the National Register of Historic Places and California State Historical Landmarks and Points of Historical Interest (NPS 2020, OHP 2020). The closest California Historical Resources to the project site is the structures located within the Workman and Temple Family Homestead Museum, approximately 3.3 miles to the southeast. Project development would occur within the confines of the project site would not impact these historical resources in any way. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown in Figure 3, *Aerial Photograp*h, the project site is in a highly industrialized area of the City; most of the project site has already been disturbed due to grading and construction activities associated with current and past uses of the project site. Given the highly disturbed condition of the project site and its surroundings, as well as the minimal grading

required for project construction, the potential for development of the proposed project to impact an unidentified archeological resource is considered extremely low. However, in the unlikely event that prehistoric and/or historic archaeological resources are discovered during ground-disturbing activities, mitigation measure CUL-1 has been identified to ensure impacts to archaeological resources would be less than significant.

Mitigation Measure

CUL-1 If any prehistoric and/or historic resources or other indications of cultural resources are found during future development of the site, all work in the immediate vicinity of the site must stop and the project construction contractor shall immediately notify the City of Industry. An archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, shall be retained to evaluate the finds and recommend appropriate mitigation measures.

Timing/Implementation: During future grading and construction activities

Monitoring/Enforcement: City of Industry

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

Less Than Significant Impact. California Health and Safety Code, Section 7050.5; CEQA Guidelines Section 15064.5; and Public Resources Code, Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code, Section 7050.5, requires that if human remains are discovered on a project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

There are no cemeteries or known human burials at the project site, and the subject property has been previously disturbed during similar building construction; however, ground disturbance (i.e., grading and excavation) would have the potential to result in discovery of human remains (although the potential is considered to be very low). In the unlikely events that human remains are discovered during ground-disturbing activities, compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. No mitigation measures are necessary.

3.6 ENERGY

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

Would the project:

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

Less Than Significant Impact. The following discusses the potential energy demands from construction activities associated with the development of the automotive dealership project and its operation.

Short-Term Construction

Development of the proposed project would include short-term construction activities that would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Construction activities would be subject to applicable regulations such as anti-idling measures, limits on duration of activities, and the use of alternative fuels where applicable, thereby reducing energy consumption. There are no aspects of the proposed project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities. For example, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would otherwise occur elsewhere (restrictions on equipment, labor, types of activities, etc.). The proposed project would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities. Short-term construction-related energy impacts would be less than significant.

Long-Term Operation

During operation, energy would be used for heating, cooling, and ventilation of the new proposed warehouse; water heating; equipment; appliances; and indoor, outdoor, and perimeter lighting and security systems Currently, the project site is an existing 52,182 square foot warehouse, which would be demolished to construct a 76,877 square foot warehouse. The new proposed warehouse would result in a net increase of industrial warehousing space by of 24,695 square feet and an increase in natural gas usage of 18,472 kilo-British Thermal Units per year and electricity usage of 433,273 kilowatt hours per year. While the project would result in an overall increase in square footage and energy usage, the proposed building would be designed and built to comply with the 2019 Building Energy Efficiency Standards (Standards) and would be a more energy-efficient (i.e., natural gas and electricity) building compared to the former existing building onsite For comparison, under

the 2019 Building Energy Efficiency Standards, non-residential buildings are generally 30 percent more energy efficient than the 2016 Building Energy Efficiency Standards. When compared to the older Building Energy Efficiency Standards prior to the 2016 Standards, the increase in building energy efficiency under the 2019 Standards is even greater. Thus, while energy usage would increase after implementation of the proposed project, overall energy efficiency would be greater compared to the existing use. Therefore, the proposed project would not result in inefficient, wasteful, and unnecessary consumption of energy during operation, and impacts would be less than significant.

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

Less Than Significant Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. In September 10, 2018, Governor Brown signed Senate Bill 100 (SB 100), which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Overall, the statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as the Industry Public Utilities Commission, whose compliance RPS requirements would contribute to the state objective of transitioning to renewable energy. In addition, the proposed building would be built to meet the 2019 Building Energy Efficiency Standards and the California Green Building Standards Code, which would result in an increase in building energy efficiency compared to the existing building. Furthermore, under the 2019 Standards, the proposed building would be built to be solar ready and would enable it to accommodate future installation of a solar photovoltaic system. Therefore, the project would not conflict with state or local plans for renewable energy or energy efficiency, and impacts would be less than significant.

3.7 GEOLOGY AND SOILS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

The analysis in this section is based partly on the following technical study, which is included as Appendix B to this Initial Study:

- *Percolation/Infiltration Testing for On-Site Storm Water Management, Sladden Engineering*, 2020, March 3.

Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults, in order to minimize the hazard of surface rupture of a fault to

people and habitable buildings. Before jurisdictions can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

The project site is not within or near an established Alquist-Priolo Earthquake Fault Zone and the nearest mapped active faults—that is, a fault that has ruptured during Holocene time (the last 11,700 years)—is the Whittier Fault approximately 4.3 miles to the south (CGS 1999, CGS 2010). Due to the distance to the active fault, the potential for surface rupture of a fault onsite is considered very low. Therefore, project development would not subject people or structures to hazards arising from surface rupture of a known active fault. Impacts would be less than significant and no mitigation measures are necessary.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The most significant geologic hazard to the design life of the proposed project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults in seismically active southern California. As with other areas in southern California, it is anticipated that the project site will likely be subject to strong ground shaking due to earthquakes on nearby faults.

As noted above, the Whittier Fault is approximately 4.3 miles to the south of the project site. This fault, as well as others in the region are considered capable of producing strong shaking at the project site, thereby exposing people or structures on the site to potential substantial adverse effects, including the risk of loss, injury, or death. The intensity of ground shaking on the project site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the project site.

However, the project site is not at a greater risk of seismic activity or impacts than other sites in southern California. California regulates development in the state through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The buildings and structures that would be built and occupied would be designed and constructed in accordance with California regulations. For example, structures for human occupancy would be required to be designed to meet or exceed the most current California Building Code (CBC; California Code of Regulations, Title 24, Part 2) standards for earthquake resistance. The CBC is adopted by reference in Title 26 (Building Code) of Chapter 1 (Administration) of the Los Angeles County Code of Ordinances. The Los Angeles County Building Code is adopted by reference in Title 15 (Buildings and Construction) of the City of Industry Municipal Code. The CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards; it contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with a specified probability of occurring in the project site. The proposed development would be required to adhere to the provisions of the CBC, which are enforced by the City during the development review and building plan check process. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures are necessary.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on three main factors: 1) cohesionless, granular soils with relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking.

Based on a review of the Baldwin Park Quadrangle Official Map of Seismic Hazard Zones, the project site is located in an area subject to liquefaction hazard (CGS 1999). However, based on the percolation/infiltration testing performed at the project site, groundwater was encountered in the upper 50 feet during subsurface explorations (Sladden Engineering 2020). Since the project site is not subjected to shallow groundwater (less than 50 feet), liquefication potential at the project site is low. Therefore, impacts associated with liquefaction would be less than significant and no mitigation measures are necessary.

iv) Landslides?

No Impact. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The project site is generally flat with no significant slopes. There are no steep hills or bluffs on, adjacent to or in the vicinity of the project site. Based on a review of the Baldwin Park Quadrangle Official Map of Seismic Hazard Zones, the project site is not in an area subject to landslide hazards (CGS 1999). Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earth-moving activities if erosion control measures are not used.

Construction Phase

Project development would involve excavation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. These activities could result in soil erosion through uncontrolled stormwater runoff, as dust particles during high winds or by being tracked offsite by construction vehicles exiting the site. However, development on the project site is subject to local and state codes and requirements for erosion control and grading during construction. For example, project development is required to comply with standard regulations, including South Coast Air Quality Management District Rules 402 (Nuisance) and 403 (Fugitive Dust), which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance offsite. For example, as outlined in Table 1 of Rule 403 (Best Available Control Measures), control measures to reduce erosion during grading and

construction activities include stabilizing backfilling materials when not actively handling, stabilizing soils during clearing and grubbing activities, and stabilizing soils during and after cut-and-fill activities.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board, effective July 17, 2012, regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 3.10, *Hydrology and Water Quality*. The project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP during grading and construction. For example, types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- Erosion controls: cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- Sediment controls: Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers, and cleaning measures such as street sweeping.
- Tracking controls: Tracking control BMPs minimize the tracking of soil offsite by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and adherence with local and state codes and requirements for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, soil erosion impacts from project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation Phase

After project completion, the project site would be approximately 87 percent impervious and developed with a new industrial warehouse/office facility and associated hardscape and landscape improvements. The proposed project would have to comply with the City's Municipal Code, Chapter 13.16 which requires preparation of a Preliminary low impact development (LID) Plan and a plan showing BMP's to reduce stormwater runoff which will prevent erosion. Additionally, all landscaped areas would be required to comply with Chapter 13.18 (Water Efficient Landscapes) of the Municipal Code. Upon project completion, the potential for soil erosion or the loss of topsoil would be expected to be extremely low. Therefore, soil erosion impacts from the project's operation phase would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Hazards from liquefaction are addressed above in Section 3.7.a.iii, and landslide hazards are addressed above in Section 3.6.a.iv. As concluded in these sections, impacts would be less than significant.

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Lateral Spreading

Lateral spreading is a phenomenon that occurs in association with liquefaction and includes the movement of non-liquefied soil materials. The project site is not prone to lateral spreading because near-surface site sediments are not prone to liquefaction. Since the project site is not subjected to shallow groundwater (less than 50 feet), liquefication potential at the project site is low Therefore, impacts associated with lateral spreading would be less than significant and no mitigation measures are necessary.

Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. The project site is not mapped in an area of subsidence by the US Geological Survey (USGS 2020) and the project does not propose any groundwater withdrawal that would create or worsen ground subsidence. Therefore, impacts associated with subsidence would be less than significant and no mitigation measures are necessary.

Collapsible Soils

Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. The project applicant would be required to prepare a site-specific geotechnical report pursuant to the CBC and the City's development code. The geotechnical report would include a detailed assessment of the suitability of site soils for supporting the proposed structures and other site improvements, and it would provide needed design recommendations for remedial grading and for foundation design to minimize hazards from unsuitable soils. Site grading, design, and construction of the project would conform with the design recommendations of the geotechnical report. Further, CBC Section 1705.6 sets forth requirements for inspection and observation during and after grading. Compliance with the provisions of the CBC and design recommendations outlined in the geotechnical report would be ensured through the City's development plan review process. Therefore, project development would not cause substantial hazards arising from collapsible soils. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Expansive soils, typically consists of clay minerals, shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. The percolation/infiltration testing performed for the proposed project identified the presence of silty sand soil at the project site. Due to the lack of clay minerals within the soil at the project site, the project site is not subjected to expansive soil. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. The project site is served by existing sewer infrastructure and project construction would not require connections to septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Paleontological resources are fossils, that is, the recognizable remains or evidence of past life on earth, including bones, shells, leaves, tracks, burrows, and impressions. As shown in Figure 3, *Aerial Photograph*, the project site is in a highly industrialized area of the City; most of the site has already been disturbed due to grading and construction activities associated with current and past uses of the site. Additionally, the City is not known to contain documented paleontological features (Industry 2014). Given the highly disturbed condition of the project site and its surroundings, as well as the minimal grading required for project construction, the potential for development of the project to impact an unidentified paleontological resource is considered extremely low. No paleontological resources were identified during prior development of the project site, and it is unlikely that any such resources would be uncovered or affected during project-related grading and construction activities. Therefore, impacts to paleontological resources would be less than significant and no mitigation measures are necessary.

3.8 GREENHOUSE GAS EMISSIONS

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

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG

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identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[2, 3]

This section analyzes the project's contribution to global climate change impacts in California through an analysis of project related GHG emissions. Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis.[4] Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state's AB 32 inventory and treats this short-lived climate pollutant separately (CARB 2017a).[5] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

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

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in Table 3-5, *Net Project-Related Operation GHG Emissions*. Operation emissions shown in the table represent the net change in emissions between the proposed and existing land uses. As shown in the table, the proposed project would generate a net increase in GHG emissions from vehicle trips generated by the project (e.g., employees and truck trips) energy

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2 Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

3 Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of PM emitted from burning fuels. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017a). However, state and national GHG inventories do not yet include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

4 Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

5 Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a).

use (indirectly from purchased electricity use and directly through fuel consumed for building heating), area sources (e.g., landscaping equipment used on-site, consumer products, coatings), water/wastewater generation, and waste disposal. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project. Overall, development and operation of the proposed project would not generate net annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year (South Coast AQMD 2010). Therefore, the proposed project's cumulative contribution to GHG emissions would be less than significant.

Table 3-5 Net Project-Related Operation GHG Emissions

Source	GHG ($MTCO_2e$/Year)
	Net Project[1]
Area	<1
Energy	102
Off-Road	127
Mobile – Passenger Vehicles	41
Mobile – Trucks	243
Solid Waste	12
Water	17
Amortized Construction Emissions[2]	14
Total	**555**
South Coast AQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr
Exceeds Bright-Line Threshold?	**No**

Source: CalEEMod, Version 2016.3.2.25. Totals may not equal to the sum of the values as shown due to rounding
Notes: MTons: metric tons; $MTCO_2e$: metric ton of carbon dioxide equivalent
1 Net inventory calculated based on proposed square footage of warehouse minus existing warehouse square footage (76,877 – 52,182=24,695).
2 Total construction emission are amortized over 30 years per South Coast AQMD methodology.

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

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include the CARB Scoping Plan and SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

3. Environmental Analysis

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy (CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. Also, new buildings are required to comply with the latest applicable Building Energy Efficiency Standards and California Green Building Code (CALGreen). On December 24, 2017, CARB adopted the Final 2017 Climate Change Scoping Plan Update to address the new 2030 interim target to achieve a 40 percent reduction below 1990 levels by 2030, established by SB 32 (CARB 2017c). While measures in the Scoping Plan apply to state agencies and not the proposed project, the project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed project would not obstruct implementation of the CARB Scoping Plan and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG recently adopted the 2020-2045 RTP/SCS (Connect SoCal) for the limited purpose of transportation conformity on May 7, 2020 and will consider full adoption of the plan in 120 days (SCAG 2020). The Connect SoCal plan identifies that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to provide for a plan that allows the southern California region to grow in more compact communities in transit priority areas and priority growth areas, provide neighborhoods with efficient and plentiful public transit, establish abundant and safe opportunities to walk, bike and pursue other forms of active transportation, and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). The Connect SoCal plan contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecasted development that is generally consistent with regional-level general plan data so as to promote active transport and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network identified in Connect SoCal, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. As discussed in Section 3.11(b) of this Initial Study, the proposed warehousing use is a permitted use under both the Industrial zoning designation and the General Plan land use designation of Employment. Thus, the proposed project is consistent with the underlying zoning and General Plan land use designations. Furthermore, vehicle miles traveled (VMT) associated with heavy duty trucks involved in goods movement is outside the realm of the RTP/SCS, which primarily focuses on VMT associated with passenger vehicles. The following is the list of RTP/SCS goods-movement strategies that are applicable to the proposed warehousing project:

- Regional Clean Freight Corridor System. Establishing a system of truck-only lanes extending from the San Pedro Bay Ports to downtown Los Angeles along Interstate 710, connecting to the State Route 60 east-west segment and finally reaching Interstate 15 in San Bernardino County

- Truck Bottleneck Relief Strategy. Working to relieve the top 50 truck bottlenecks. Examples of bottleneck relief strategies include ramp metering, extension of merging lanes, ramp and interchange improvements, capacity improvements and auxiliary lane additions

- Good Movement Environmental Strategy and Action Plan. Reducing environmental impacts by supporting the deployment of commercially available low-emission trucks and locomotives. Advancing technologies to implement a zero- and near zero-emission freight system.

Therefore, overall, implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS and impacts would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

The analysis in the section is based party on the following technical study, which is included as Appendix C to this Initial Study.

- *Phase I Environmental Site Assessment*, *Advanced Geo Environmental*, 2019, November 18.

3. Environmental Analysis

Project Site History

The term "hazardous material" is defined in different ways by different regulatory programs. For purposes of this environmental document, the definition of "hazardous material" is the same as California Health and Safety Code, Section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as California Health and Safety Code, Section 25117, and California Code of Regulations, Title 22, Section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

A Phase I Environmental Site Assessment (Phase I) was prepared to disclose potential environmental conditions on the proposed project site. The purpose of a Phase I is to identify recognized environmental conditions (RECs) in connection with the subject property. A REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. Conditions that are determined to be de minimis, which do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies, are not recognized environmental conditions.

The Phase I further identifies historical RECs and controlled RECs. A historical REC (HREC) is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. A controlled REC (CREC) is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

The project site has undergone extensive environmental investigations performed under the oversight of the DTSC as part of Flint Inks vacancy of the property. During these investigations, contaminants in the soil and soil vapor were determined to be acceptable for commercial/industrial uses. A final closure certification from the DTSC was issued by in November 2019 with a land use covenant indicating that the property can only be used for commercial/industrial purposes. The City will condition this covenant upon project approval. The following historical investigations were identified for the proposed project site on the DTSC's Envirostor data base:

RCRA Facility Assessment Report, July 2004:

This report was prepared for the US EPA under EPA's 'RCRA Facility Assessment Guidance'. Spills from wastes or hazardous constituents associated with waste management activities including releases from solid waste management units (SWMUs) and other Areas of Concern (AOCs) were investigated. The report is a comprehensive summary of information obtained from reviews of regulatory agency files along with a visual inspection of the property. Items summarized in the report include facility processes and waste management.

The facility processed waste water from ink manufacturing which was stored in an 8,000-gallon underground storage tank (UST) located northwest of the building. The UST was used from 1968 until 1983 and was removed in 1990 under regulatory guidance. Soil samples were collected at the time of removal and elevated petroleum hydrocarbon concentrations were found in the soil. In addition, various metals were detected. Groundwater was not encountered. Groundwater in the area is reported at approximately 90 feet below surface grade. In 1992, a preliminary assessment was conducted identifying 31 above ground storage tanks (ASTs) of varying size containing raw ink materials and /or finished products.

Three SWMUs were identified in the RFA including 1) the former 8,000-gallon UST, 2) the tub-washer, and 3) drum storage area.

AOCs included the AST area (tank farm), Compressor Area, North Wall of Manufacturing Building, Transfer Lines Area, Southwest Sump and Drum Storage Area Sump. One was boring drilled to approximately 40 feet in the AST Area, soil samples collected from the boring indicated elevated concentrations of petroleum hydrocarbons in one sample.

The RFA concluded there were substantial releases of hazardous waste constituents in four SWMUs and AOCs and potential releases at other AOCs. An additional investigation was recommended.

Acknowledgement of Closure Certification, June 2014

Correspondence form the DTSC regarding the closure of the 8,000-gallon UST (identified as SWMU). The closure performance standards for soil were set and concentrations in samples from below the UST were well below the standard. Total petroleum hydrocarbons (TPH) as diesel was reported below detection limits in the UST excavation. Oil and grease were also reported are less than the detection limit. These met the closure performance standard. DTSC determined that the closure performance standards in the modified Closure Plan approved in November 1989 were met for the underground hazardous waste management unit (HWMU) and DTSC considers it to be closed.

3. Environmental Analysis

Corrective Action Consent Agreement, May 2016

The executed Corrective Action Consent Agreement between the DTSC and Flint Group identifies the three WMUs and seven AOCs. The Flint Facility formerly manufactured printing ink for commercial and industrial uses and generated wastewater during the rinsing of paint tubs. Waste water was stored in a former UST, which was a HWMU. The tank was excavated per guidance set forth in the *Revised Closure Plan*, prepared by Blymer Engineers, Inc., February 1989. The closure plan was for the 8,000-gallon UST containing ink processing rinseate waste from the UST facility. and removed under the Los Angeles Regional Water Quality Control Board (LAWQRCB) oversight on March 27, 1990. A "no further action" letter was issued to Flint Facility by the LAWQCB on October 12, 2004.

The Department of Toxic Substances Control conducted a visual site inspection (VSI) on May 10, 2001. A RCRA Facility Assessment (RFA) incorporating the findings of the VSI was completed in June 2004. Based on the RFA, further action is being recommended to investigate the extent and threat of hazardous waste releases at the Facility.

A draft corrective action consent agreement between DTSC and Flint Group was prepared and signed in April 2016. In March 2018, DTSC received a RCRA Facility Investigation Work Plan and subsequently approved the work plan. The Workplan was implemented at the Site in June and July 2018. Subsequently, in September 2018, the Flint Group submitted the first draft of the RCRA Facility Investigation (RFI) Report. Based on the review of the RFI, DTSC approved the revised report. The letter from February 2019 indicated that "the data did not reveal any significant release of constituents-of-concern at the facility." Subsequently, DTSC will evaluate whether or not to terminate the corrective action.

Revised RCRA Facility Investigation (RFI) Report, Ramboll Environ, January 2019

The most recent assessment and summary of the site was submitted in January 2019. Ramboll Environ submitted a Revised RFI report for the site. The report summarized previous investigations including soil, soil vapor sampling and soil excavations in various AOCs and SMUs at the site. The investigation evaluated if the subsurface had been impacted by historical operations in area of the identified SWMUs and AOCs of the property, confirmed previous soil vapor sampling results in various AOCs, and determine if the impact creates an unacceptable health risk. The report concluded that these areas of SWMUs and AOCs on the site had not been impacted at a level that would create a health risk and indicated unrestricted regulatory closure of the various AOCs and SWMUs. In February 2019, DTSC a determined a public notice of a proposed 'RCRA Corrective Action Completion with Controls' at the Flint Group Facility. DTSC drafted the 'Statement of Basis', 'CEQA Notice Of Exemption', 'Community Update' (Fact Sheet), and public notice announcement for newspaper publication within the area encompassing the facility.

RCRA Proposed Corrective Action Completion with Controls, Prepared by DTSC, May 2019

This document summarized the previous assessments completed at the site, and includes a "Statement of Basis" for the RCRA Corrective Action Completion. The DTSC determined controls are appropriate because likely impacted soils remain underneath the ASTs in the active AST Area and the soils beneath the building itself were not required to be evaluated due to continuing operations of 'corrective action complete with Controls'

after reviewing the available investigation data for the site. RCRA Preliminary Assessment, Facility Assessment and a Corrective Action Consent Agreement were summarized ultimately determining the corrective action complete with controls. DTSC is proposing to make a determination of "RCRA Corrective Action Complete with Controls" after developing sufficient information through the RCRA Facility Assessment (RFA) and RFI portions of the corrective action process to reasonably assure that unacceptable exposure to potential industrial/commercial receptors and release or threatened release of hazardous substances and/or hazardous constituents to the environment will be prevented by implementation of institutional controls and Operation and Management (O&M) Plan.

Statement of Basis, Prepared by DTSC, May 2019

This document summarizes the RCRA Corrective Action Completion, as part of the public participation requirements for closure of the facility. The document summarizes corrective action and investigation completed at the site. This is essentially the same document with a different title as the May 2019 document identified above.

In addition to the regulatory data base, the following documents were identified in the Phase I, or provided by the applicant after completion of the Phase I:

Revised Closure Plan, Blymer Engineers, Inc., February 1989

Closure plan for an 8,000-gallon UST containing ink processing rinseate waste from the UST facility.

Tank Removal, Blymer Engineers, Inc., August 1990

A 10,000-gallon diesel fuel UST was removed from the property. Two soil samples collected beneath the UST did not contain any detectable concentrations of petroleum hydrocarbons.

Initial Subsurface Investigation, October 1990, Blymer Engineers, Inc

The investigation was required by the RWQCB after a site inspection was completed at the property in March 1990. The RWQCB found evidence of oil and ink waste leaks. Soil samples were collected and analyzed for total recoverable petroleum hydrocarbons (TRPH) and volatile organic compounds (VOCs). Elevated concentrations of TRPH were only found in one sample at a depth of 1-foot bsg. VOCs were not detected in any of the samples collected.

Level I Environmental Site Assessment, Blymer Engineers, Inc., August 1991

Report discussing history of the property and possible hazardous material used at the site. During the visual inspection, ten, 4,000-gallon ASTs were noted. Other ASTs were also noted, along with a trench, pit, sumps, 55-gallon drums of waste oil and drains. According to the report, the LAFD has records indicating four USTs were located at the site. In addition, the report concluded that asbestos-containing materials (ACMs) were observed and subsequently tested.

Soil Vapor Survey Results, October 1992, Blymer Engineers Inc.

3. Environmental Analysis

As required by the RWQCB, twelve soil vapor points at depths ranging from 5 to 15 feet were established at the site. VOCs, including PCE and 1,1,1-TCA, were detected in every sample collected at minor concentrations. However, based on the low concentration of VOCs detected, no further soil vapor sampling was recommended.

Final Closure Report, March 1994, Environmental Remediation Corporation (EREMCO)

The report indicates previous soil contamination detected at the site was minor and found at shallow depths. Soil excavation was performed in these areas. Sample results indicated VOCs and TPH were not detected with the exception of minor TPH being detected in a single sample. The report concluded that the site had been completely remediated and closure was requested.

No Further Action letter, October 1994

The letter was issued by the RWQCB in relation to the Well Investigation Program investigation which was performed to determine if the subject property operations had contributed to the regional VOC plume in the vicinity of the property. Based on the findings of the Final Closure Report and other historical documents, it was determined the subject property was not a contributor to the regional plume and no further action was required at the facility.

Limited Site Investigation, August 2002, URS Corporation

The investigation was conducted to assess potential soil impacts associated with a limited area of stained surface soil. Shallow soil samples were collected from the area and analyzed for TPH, VOCs, SVOCs and metals. Only minor amounts of TPH and VOCs were detected in two of the samples and were below any clean up levels. All detected metals concentrations were within background levels. Based on the analytical results, no additional sampling was recommended

RCRA Facility Assessment Report (RFA), 2004, Prepared by DTSC

This report was prepared for the US EPA under EPA's 'RCRA Facility Assessment Guidance'. Spills from wastes or hazardous constituents associated with waste management activities including releases from solid SWMUs and other AOCs were investigated. This report summarizes past operations at the site and identified potential areas of concern at the site. Soil samples were collected at the time of removal and elevated petroleum hydrocarbon concentrations were found in the soil. In addition, various metals were detected. Groundwater was not encountered. Groundwater in the area is reported at approximately 90 feet below surface grade. In 1992, a preliminary assessment was conducted identifying 31 ASTs of varying size containing raw materials and /or finished products.

Three SWMUs were identified in the RFA including 1) the former 8,000-gallon UST. 2) the tub-washer, and 3) drum storage area.

AOCs included the AST area, Compressor Area, North Wall of Manufacturing Building, Transfer Lines Area, Southwest Sump and Drum Storage Area Sump. One boring to approximately 40 feet was established in the AST area, soil samples indicated elevated concentrations of petroleum hydrocarbons in one sample only. The

RFA concluded there were substantial releases of hazardous waste constituents in four SWMUs and AOCs and potential releases at other AOCs. An additional investigation was recommended.

In addition, exposure pathways for human health risk were discussed and it was determined that if releases from the identified SWMUs or AOCs occurred, there would be potential for the contamination to migrate into groundwater and move towards drinking water wells located northwest of the property. Also stated was the potential for exposure to contamination that might migrate into surface water through storm drains.

Current Conditions Report, October 2016, Ramboll Environ

The report was prepared to satisfy portions of a RCRA Facility Investigation (RFI) and evaluated the type and extent of hazardous waste releases, if any, from previously identified SMWUs and AOCs at the site. The report also identified data gaps in areas which may need additional investigation. The report summarized past investigations and identified any data needs which included shallow soil and soil vapor sampling in two if the SWMUs and two of the AOCs.

Revised RCRA Facility Investigation (RFI) Report, Ramboll Environ, January 2019

The report summarized previous investigations including soil, soil vapor sampling and soil excavations in various AOCs and SMUs at the site. The investigation evaluated the if the subsurface had been impacted by historical operations in various areas (identified SWMUs, AOCs) of the property, confirmed previous soil vapor sampling results, in various AOCs and determine if the impact creates an unacceptable health risk. The report concluded that these areas of the site had not been impacted at a level that would create a health risk and indicated unrestricted regulatory closure of the various AOCs and SWMUs. In February 2019, DTSC posted a public notice of a proposed 'RCRA Corrective Action Completion with Controls' at the Flint Group Facility. DTSC drafted the 'Statement of Basis', 'CEQA Notice Of Exemption', 'Community Update' (Fact Sheet), and public notice announcement for newspaper publication within the area encompassing the facility.

The most recent assessment and summary of the site was conducted in January 2019. Ramboll Environ submitted a Revised RFI report for the site. The report summarized previous investigations including soil, soil vapor sampling and soil excavations in various AOCs and SMUs at the site. The investigation evaluated the if the subsurface had been impacted by historical operations in various areas (identified SWMUs, AOCs) of the property, confirmed previous soil vapor sampling results, in various AOCs and determine if the impact creates an unacceptable health risk. The report concluded that these areas of the site had not been impacted at a level that would create a health risk and indicated unrestricted regulatory closure of the various AOCs and SWMUs, including the seven exterior ASTs.

Status of Environmental Conditions, March 2019, Ramboll Environ

Ramboll's evaluated soil vapor, based on shallow soil vapor samples collected at the site indicated VOCs were not detected in the shallow soil vapor. Deeper soil vapor samples contained minor concentrations of PCE at levels below commercial and residential screening levels, both inside and outside the building. Soil quality was evaluated from data collected inside and outside the building which were analyzed for various constituents, depending on depth and location of the sample. Samples were analyzed for metals, TPH and pH. Based on the

analytical results, TPH was not detected and metals were within background concentrations. Ramboll concluded the DTSC approved the revised RFI Report in February 2019 indicating the termination of the site's corrective action.

RCRA Proposed Corrective Action Completion with Controls, Prepared by DTSC, May 2019

This document summarizes the previous assessments completed at the site, and includes a "Statement of Basis" for the RCRA Corrective Action Completion. The DTSC proposed to make a determination. The DTSC determined controls are appropriate because likely impacted soils remain underneath the ASTs in the active AST Area and the soils beneath the building itself were not required to be evaluated due to continuing operations of corrective action complete with Controls' after reviewing the available investigation data for the site. RCRA Preliminary Assessment, Facility Assessment and a Corrective Action Consent Agreement were summarized ultimately determining the corrective action complete with controls. DTSC proposed to make a determination of "RCRA Corrective Action Complete with Controls" after developing sufficient information through the RCRA Facility Assessment (RFA) and RFI portions of the corrective action process to reasonably assure that unacceptable exposure to potential industrial/commercial receptors and release or threatened release of hazardous substances and/or hazardous constituents to the environment will be prevented by implementation of institutional controls and Operation and Management (O&M) Plan.

DTS Notice Of Final Decision for the RCRA Corrective Action Completion With Controls (U.S.EPA Number Cad 008 330 185)

DTSC prepared the Final Notice based on the administrative record that the implementation of the Institutional Control in the form of a Land Use Covenant (LUC) is appropriate and would be protective of the environment and human health. The Notice included the Notice of Exemption in compliance with the California Environmental Quality Act (CEQA). With the Final Notice, the proposed project can be developed for allowable land uses, including industrial and warehousing uses.

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less Than Significant Impact.

Construction

The proposed project site is developed with an approximately 51,900-square foot building, which is located in the center of the site. One, single-story building at the site housed production, laboratory, storage and office operations for ink manufacturing. The site has a tank farm area to the north with seven ASTs, which were used to store ink and vegetable based oils; two sets of train tracks that run through the northern portion of the property, an in-ground offloading device set into the train track area by the warehouse for the offloading of carbon black, an outdoor hopper for the storage of carbon black, and a loading and loading dock area for the loading of ink products and the offloading of raw materials. Historic major operations conducted at the site consisted of ink manufacturing, including raw material and product receiving, product processing, and product

container filling, transferring, and shipping. The site is currently vacant and the site, including the tank farm, is being decommissioned under the guidance the City of Los Angeles serving as the Certified Unified Program Agency (CUPA).

Historically, the property utilized one, 8,000-gallon UST to contain ink waste wash water. This UST was installed in the late 1960s and removed in the 1980s. Additionally, one 10,000-gallon diesel fuel UST was located on the property and was removed in 1990. Currently there are no USTs on the site. During the Revised RCRA Facility Investigation Report (RFI), prepared for closure and decommissioning of the facility, Ramboll US Corporation (Ramboll) staff observed 42 ASTs, the majority comprised of 55-gallon drums throughout the proposed project site. Seven of the ASTs included the tank farm area. As described in Section 1.2.1, Existing Land Use, the tank farm consists of four-50,000 gallon above ground storage tanks (ASTs) and three-20,000-gallon ASTs. The ASTs and the associated above ground piping to transfer the materials are located within bermed concrete.

The primary raw material used at the proposed project site were carbon black, varnishes, petroleum-based oils, soy-based oils, waxes, and powder additives. In addition, the operator used maintenance-related materials, such as oils, lubricants, greases, aqueous degreasers, welding gases, boiler/cooling tower/water treatment chemicals, refrigerant chemicals, and cleaning solvents.

The RFI identified three SWMUs and seven AOCs. The SWMUs and AOCs are listed below:

- **SWMU-1, Former 8,000-Gallon UST:** The 8,000-gallon UST, formerly containing wastewater, was installed in 1968, decommissioned in 1983, and excavated and removed under the LARWQCB and the Department of Health (DHS) oversight in 1990. The LARWQCB granted a No Further Action (NFA) for the UST in a letter dated October 12, 1994 and the DTSC confirmed the SWMU is closed on June 9, 2014.

- **SWMU-2, Former Tub Washer:** The Former Tub Washer was installed in 1983, when the use of the former 8,000-gallon UST ceased. The former tub washer was a closed system consisting of a clarifier and a vat where tubs containing small amount of residual ink were washed. The former tub washer was removed in 2001. No information regarding the removal is available.

- **SWMU-3, Former Drum Storage Area:** The Former Drum Storage Area was located in the west corner of the building exterior and consisted of 55-gallon drums stored on wooden pallets. Historically, wastes removed from the former tub washer were placed in 55-gallon drums, labored, and transferred to the former drum storage area, pending off-site disposal.

- **AOC-1, Above Ground Storage Tank Area:** The ASTs are located northwest of the building and are used to store finished products and oils. At the time of the RCRA, the AOC was active. During Ramboll's site visit, the concrete appeared to be in good condition, with minimal observed staining.

- **AOC-2, Two On Site Soil Piles Resulting from 8,000-Gallon UST Excavation:** These soil piles were removed and this AOC received an NFA from the LARWQCB in a letter dated October 12, 1994. The DTSC has confirmed that the AOC is closed on June 9, 2014.

- **AOC-3, Compressor Area:** The compressor room area is located inside the northern corner of the building. The LARWQCB initially observed discharge of compressor water and oil to bare soil at the northwest corner of the building exterior. At the time of the site visit by Ramboll, the concrete floor in the compressor room appeared dry with moderate oily stains. The concrete appeared to be dry with no visible cracking.

- **AOC-4, North Wall of Manufacturing Building:** The LARWQCB observed discharge of ink wastes to bare soil through cracks in the north wall of the building, which includes the compressor room and the boiler room. Ramboll did not observe any staining or cracks along the northern wall. Moderate oily staining was observed on the asphalt surface between the rail spur and the norther wall.

- **AOC-5, Transfer Lines Area:** The LARWQCB observed discharge of inks to bare soils under the transfer lines at the southwest of the railroad siding. The railroad siding is located parallel to the northwestern wall of the building. The transfer line is approximately 15-feet deep and is covered with a concrete ramp. During Ramboll's site visit, the concrete ramp that covers the transfer line appeared to be in good condition with minimal observed staining.

- **AOC-6, Southwest Sump:** The LARWQCB observed a sump located by the shipping receiving area. The sump is a rainwater catch basin. The run-off that is captured in the sump gets pumped to the storm sewer system. The sump is approximately 5-feet deep and during Ramboll's site visit, contained a small amount of water.

- **AOC-7 Drum Storage Area Sump:** The LARWQCB observed a sump located at the southwest end of the railroad siding. The sump receives water from the tank farm. The sump is approximately 6-feet deep and during Ramboll's site visit, contained a small amount of water.

Based on the evaluation of existing investigations and observations made during the site visit, it was determined that further soil sampling was required for SWMUs-2 and -3, and for AOC-3 through AOC-6. Based on historical site operations, available information regarding Flint's chemical use, and data obtained from historical investigations and remediation, AOC-1 had been addressed sufficiently by previous soil investigations and subsequent excavations. As such, Ramboll concluded that additional investigations were not warranted at AOC-1 and DTSC concurred, and the ASTs could be decommissioned under the guidance of the City of Los Angeles CUPA, and decommissioning is currently underway.

The project site is located within Area 4 of the San Gabriel Valley Groundwater Basin, known as the Puente Valley Operable Unit (PVOU) which is a state and federal Superfund area due to four major halogenated volatile organic compounds (HVOCs) contamination plumes in the groundwater.

Soil data collected from during the RFI were compared to DTSC-modified and/or USEPA commercial industrial and residential RSLs for soil, with the exception metals, which were compared to calculated site-specific background metal concentrations, using the upper 95 percent confidence level (95%UCL).

Soil gas data were compared to most up-to-date calculated commercial/industrial and residential soil gas screening levels. Soil gas screening levels are calculated as the ratio of the DTSC-Modified RSL (CalEPA 2018)

or USEPA RSL (USEPA 2018) for commercial/industrial and residential air to a default attenuation factor of 0.001 for existing commercial buildings and residential future building, as recommended by CalEPA (2015).

The sampling results indicate that:

- In soil, TPH (GRO, DRO, and ORO) were either not detected above their respective laboratory reporting limits or detected at concentrations well below the commercial/industrial and residential thresholds. Similarly, metals were either not detected above their respective laboratory RLs or detected at concentrations several orders of magnitude below their respective regulatory thresholds.

- In soil gas, VOCs were not detected above their respective laboratory reporting limits in any of the shallow 5-foot soil gas samples. PCE (nine detections) and m,p-xylenes (1 detection) were the only VOCs detected in the 15-foot soil gas samples. PCE was detected at low concentrations ranging from 0.028 µg/l to 0.060 µg/l, well below the commercial industrial threshold of 2.0 µg/l and the residential threshold of 0.46 µg/l. m,p-xylenes were detected at a concentration of 0.024 µg/l, several orders of magnitude below the commercial/industrial and residential thresholds of 440 µg/l, and 100 µg/l, respectively. Additionally, two VOCs, 1,1-DCE and 1,1,1-TCA, which were historically detected in soil gas samples, were not detected during this RFI. The absence of VOCs from the shallow 5-foot soil gas samples and the presence of low VOC levels in the deeper soil column indicates that these low detections are unlikely to result from the SWMUs or AOCs and are more likely related to the San Gabriel Valley Area 2 – BPOU groundwater plume that underlies the Site.

The soil and soil gas sampling results do not present an unacceptable health risk or an environmental concern at SWMU-2 and SWMU-3, AOCs 3 through 6, and the transformer at the Site. The DTSC determined land use controls are appropriate because of the potential that impacted soils remain underneath the ASTs in the tank farm area and the soils beneath the building itself would not be required to be evaluated due to continuing operations of corrective action complete with Controls after reviewing the available investigation data for the site. In November 2019, the DTSC prepared a Final Notice based on the administrative record that the implementation of the Institutional Control in the form of a Land Use Covenant (LUC) is appropriate and would be protective of the environment and human health. The Notice included the Notice of Exemption in compliance with CEQA. With the Final Notice, the proposed project can be developed for allowable land uses, including industrial and warehousing uses. The City would enforce the LUC as a condition of approval of the proposed project.

Construction activities of the proposed project involve the use of larger amounts of hazardous materials than would project operation. Construction activities include the use of materials such as cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings including paints. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the construction phase. Project construction workers would also be trained in safe handling and hazardous materials use.

The use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws and regulations, including the California Department of Toxic Substances

3. Environmental Analysis

Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, County of Los Angeles Department of Environmental Health, and LACoFD. Title 40 of the Code of Federal Regulations, part 263, establish standards which apply to persons transporting hazardous waste. If a transporter discharges or spills hazardous waste, he or she is required to take appropriate, immediate action to protection human health and the environment such as notifying local authorities. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials through the implementation of established safety practices, procedures, and reporting requirements would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the City and the Los Angeles County Fire Department (LACoFD) would be required through the duration of the construction phase. As the site is currently vacant and is being decommissioned under the guidance the City of Los Angeles serving as the Certified Unified Program Agency (CUPA), it is not anticipated that any hazardous materials would be encountered during construction activities. . Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during construction would be less than significant and no mitigation measures are necessary.

Operation

Operation of the proposed project would involve the limited use of hazardous materials for air conditioning, janitorial, maintenance, and repair activities, as well as medical supplies used at the nurse's office. These materials would include cleansers, paints, degreasers, adhesive, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. However, these types of materials are not considered acutely hazardous and would be used in limited quantities. Warehouse and distribution facilities are also not associated with activities that use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, heavy industrial, medical (e.g., hospital), and other similar uses.

Additionally, for warehousing purposes, only dry-storage uses would operate out of the proposed building—no cold-storage uses would operate onsite. Also, no manufacturing or food processing business would operate onsite. The building is designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the movement of truck trailers in the open yard. The loading and unloading of truck trailers would occur in and be restricted to the exterior loading dock area. No loading or unloading activities would occur in the open yard area.

Furthermore, the use, storage, transport, and disposal of hazardous materials of the proposed project would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, County of Los Angeles Department of Environmental Health, and LACoFD. Compliance with applicable laws and regulations governing the use, storage, transport,

and disposal of hazardous materials through the implementation of established safety practices, procedures, and reporting requirements would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

Therefore, hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the proposed project would not occur. Impacts would be less than significant and no mitigation measures are necessary.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. See response to Section 3.9.a., above. As concluded in this section, hazards to the public or the environment arising from the routine use of hazardous materials during project construction and operation phases would be less than significant and no mitigation measures are necessary.

The Phase I prepared for the proposed project indicated that there is potential for AMC and LBP present at the project site due to the age of the existing building. Demolition of the buildings can cause encapsulated ACMs (if present) to become friable and, once airborne, they are considered a carcinogen. A carcinogen is a cancer-causing substance or helps cancer grow. Demolition of the existing buildings can also cause the release of lead into the air if not properly removed and handled. USEPA has classified lead and inorganic lead compounds as "probable human carcinogens" (USEPA 2020). Such releases could pose significant risks to persons living and working in and around the project site, as well as to project construction workers.

If the presence of asbestos and lead are found during the full lead and asbestos survey, abatement of all ACM and LBP encountered (if any) during building demolition would be required to be conducted in accordance with all applicable laws and regulations, including those of USEPA, which regulates disposal; US Occupational Safety and Health Administration (OSHA); US Department of Housing and Urban Development; California Occupational Safety and Health Administration (Cal/OSHA, which regulates employee exposure); and SCAQMD.

For example, Cal/OSHA's regulations for exposure of construction employees to ACMs requires demolition materials be handled and transported the same as other, non-friable ACMs. USEPA requires all asbestos work performed within regulated areas be supervised by a competent person who is trained as an asbestos supervisor (USEPA Asbestos Hazard Emergency Response Act, 40 CFR 763). SCAQMD's Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities; the rule requires that buildings undergoing demolition or renovation be surveyed for ACM prior to any demolition or renovation activities. Should ACM be identified, Rule 1403 requires that ACM be safely removed and disposed of at a regulated site, if possible. If it is not possible to safely remove ACM, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of asbestos. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1529 (Asbestos), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

3. Environmental Analysis

Further, OSHA Regulation 29 (CFR Standard 1926.62) regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, and the safe demolition of buildings containing LBP or other lead materials. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1532.1 (Lead), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. Project compliance with all applicable laws and regulations related to ACM's and LBP would be ensured through the City's development plan review process.

Based on the preceding, hazards to the public or the environment arising from the disturbance and/or removal of hazardous materials onsite would be less than significant and no mitigation measures are necessary.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The project site is not located within 0.25 miles of an existing or proposed school. The nearest school to the project site is Madrid Middle School, located approximately 0.5 mile to the west. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The Phase I Environmental Site Assessment prepared for the proposed project reviewed federal, state and regional regulatory agency databases (such as Geotracker, Envirostor, USEPA, DTSC, and etc.) to consider the potential of contamination from nearby sites and the project site. As described under Section 3.9.a, the proposed project site is listed on several regulatory databases as a result of the removal of the 8,000-gallon UST. As reported, the DTSC has closed the case. Subsequent investigations conducted as on behalf of Flint in order to decommission the ink manufacturing facility determined that the proposed project site could be decommissioned under regulatory oversight of the City of Los Angeles CUPA, including removal of the tank farm. The DTSC, after a review of the available data determined that the proposed project site , determined that with Institutional Controls, development of the project site could occur. The City would enforce the controls as a condition of approval.

Results of the records search did not identify adjacent or nearby sites within a 0.25-mile radius to present an potential environmental risk to the project site with the exception of the site being located within Area 4 of the San Gabriel Valley Groundwater Basin, a ground water plume that has been under investigation and remediation since 1984, and a Leaking Underground Storage Tank (LUST) located 350 feet north of the project site closed in 1998 (Sladden 2020). Therefore, impacts would be less than significant and no mitigation measures are necessary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The project site is not within an airport land use plan and there are no public airports or private airstrips within two miles of the site. The nearest airport to the project site is the San Gabriel Airport, approximately 2.6 miles to the northwest. There are privately and government operated helipads within the vicinity of the proposed project site; however, development of the proposed project would not alter the flight path of these helipads. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The Standardized Emergency Management System (SEMS), California Code of Regulations, Title 19, Division 2, Section 2443, requires compliance with the SEMS to "be documented in the areas of planning, training, exercise, and performance." The Los Angeles Operational Area Emergency Response Plan (OAERP) was approved by County of Los Angeles Board of Supervisors on June 2012. The purpose of the OAERP is to establish the coordinated emergency management system which includes prevention, protection, response, recovery and mitigation with the County of Los Angeles before, during and after an emergency. Under the OAERP, the Office of Emergency Management is responsible for organizing and directing the preparedness efforts of the Emergency Management Organization of Los Angeles County. The OEM is the day-to-day Los Angeles County Operational Area coordinator for the County (Los Angeles County 2012).

The proposed project would not interfere with the implementation of the OAERP and any of the daily operations of the City's Emergency Operation Center, Los Angeles County Fire Department (LACoFD), or Los Angeles County Sherriff's Department. All construction activities would be required to be performed per the City's and LACoFD's standards and regulations. For example, the proposed project would be required to provide the necessary on and offsite access and circulation for emergency vehicles and services during the construction and operation phases. The proposed project would also be required to go through the City's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations, as set forth by LACoFD and in the Chapter 15.28 (Fire Code) of the City's Municipal Code, to ensure that they do not interfere with the provision of local emergency services (e.g., provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Therefore, the proposed project would not impair implementation of or physically interfere with the City of Industry nor Los Angeles County's emergency response or evacuation plans. Project-related impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. There would be no impact for wildland fire risks due to implementation of the proposed project, as substantiated in Section 3.20, *Wildfire*. The project site is not in or near a state responsibility area or land classified as very high fire hazard severity zone (CAL FIRE 2007b). Therefore, implementation of the proposed project would not introduce people or structures to substantial hazards from wildland fires. No impact would occur and no mitigation measures are necessary.

3.10 HYDROLOGY AND WATER QUALITY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Would the project:

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

Less Than Significant Impact.

Construction Phase

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). The project's construction phase may cause deterioration in the quality of downstream receiving waters if construction-related sediments or pollutants wash into the existing storm drain system and facilities in the area.

Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Non-sediment related pollutants that are also of concern during construction relate to non-stormwater flows and generally include construction materials (e.g., paint and stucco); chemicals, liquid products, and petroleum products used in building construction or the maintenance of heavy equipment; and concrete and related cutting or curing residues. Construction-related activities would generate pollutants that could adversely affect the water quality of downstream receiving waters if appropriate and effective stormwater and non-stormwater management measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Construction projects of one acre or more are regulated under the Statewide Construction General Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board in 2012. Projects obtain coverage by developing and implementing a SWPPP estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described in Table 3-6, *Construction Best Management Practices*.

Table 3-6 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales
Sediment Controls	Filter out soil particles that have been detached and transported in water	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes

Source: CASQA 2015

3. Environmental Analysis

The project's construction contractor would be required to prepare and implement an SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs, such as those outlined in Table 3-6, that the construction contractor would implement to protect water quality by eliminating and/or minimizing stormwater pollution prior to and during grading and construction and show the placement of those BMPs. Additional construction BMPs that would be incorporated into the project's SWPPP and implemented during the construction phase include but are not limited to:

- Perimeter control with silt fences and perimeter sandbags and/or gravel bags.
- Stabilized construction exit with rumble strip(s)/plate(s).
- Installation of storm drain inlet protection on affected onsite drains and within roadways.
- Installation of silt fences around stockpile and covering of stockpiles.
- Use of secondary containment around barrels, containers and storage materials that may impact water quality.
- Stabilization of disturbed areas where construction ceases for a determined period of time (e.g., one week) with erosion controls.
- Installation of temporary sanitary facilities and dumpsters.

BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete, asphalt, bituminous13 materials, etc.; and nutrients. Adherence to the BMPs in the SWPPP would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. Based on the preceding, water quality and waste-discharge impacts from project grading and construction activities would be less than significant and no mitigation measures are necessary.

Operational Phase

Operational-related activities (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Requirements for waste discharges potentially affecting stormwater from project operations are set forth in Chapter 13.16 (Standard Urban Stormwater Mitigation Plan Implementation) of the City's Code. Standard Urban Stormwater Mitigation Plan (SUSMP) requirements include minimizing stormwater pollutants and limiting peak post-project stormwater runoff rates to no greater than predevelopment rates where increased runoff could increase downstream erosion.

Municipal Code Chapter 13.16 applies to new development involving parking lots of 5,000 square feet or more or having 25 or more parking spaces and potentially exposed to stormwater runoff. The proposed project includes 119 parking spaces and is subject to the Code requirements. As part of the permitting process, such facilities are required to comply with stormwater BMPs listed in the SUSMP or the "BMP Guidebook" prepared or recommended by the City Engineer. BMPs designed to protect against impacts to water quality would be incorporated in a project-specific SUSMP that is submitted to City staff for review and approval as part of the Development Plan review process. Project BMPs include source control BMPs, including both non-structural

and structural. The approved BMPs would be incorporated in the project grading and site plans; detail drawings and notes would provide specifications regarding size, capacity, and materials of construction.

In order to meet the requirements of Section 13.16, the project site would include two infiltration systems with storm chambers using low impact development (LID) principles. The infiltration systems are designed to retain or filter stormwater runoff in order to prevent accelerated downstream erosion and protect stream habitat in natural drainage systems. Storm chambers allow stormwater to be stored until it can infiltrate into the ground which will minimize changes in post-development hydrologic stormwater runoff discharge rates, velocities, and duration. By development of the infiltration system would ensure that stormwater would be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed.

Based on the preceding, no significant water quality and waste-discharge impacts from project operation activities would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The project site is located within the San Gabriel Valley Groundwater Basin where much of the Basin is a state and federal Superfund area due to four major halogenated volatile organic compounds (HVOCs) contamination plumes in the groundwater (Sladden Engineering 2020). Water to the project site is serviced by San Gabriel Valley Water District (SGVWD) (Industry 2011). SGVWD's water supply sources groundwater pumped from the Main San Gabriel Groundwater Basin and the Central Groundwater Basin, imported surface water purchased from Central District, and recycled water. SGVWD projects that it will have adequate water supplies to meet water demands in its service area for normal, single-dry, and multiple dry years (SGVWD 2017). The project site is not in or near a groundwater recharge area/facility, nor does it represent a source of groundwater recharge. Therefore, the proposed project would not substantially interfere with groundwater supplies or recharge. Impacts to groundwater supplies would be less than significant and no mitigation measures are necessary.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. No streams or rivers traverse the project site, which is already developed and largely flat. The nearest water body to the project site is the San Jose Creek Chanel of the San Gabriel River, which passes approximately 500 feet north of the project site. Development under the proposed project would not involve alteration of the channel's course. The project site is in a highly urbanized, built-out portion of the City and is largely flat; soils have already been disturbed by existing development. Although soils in the project site could experience erosion during construction, implementation of the proposed project would not cause substantial soil erosion. A SUSMP specifying BMPs for minimizing pollution of stormwater with soil and sediment during project construction would be prepared and

implemented. Adherence to the BMPs in the SUSMP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, impacts related to substantial soil erosion or siltation would be less than significant., and no mitigation measures are necessary.

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

Less Than Significant Impact. Drainage from the project site would flow into the new stormwater infiltration system, catch basin and proposed onsite storm drains and then San Jose Creek via existing storm drains located on East Temple Avenue. As discussed in Section 5.10(a), the site would be developed using LID principles. Pursuant to LID standards, the drainage system would manage runoff in a way that by using storm chambers that would allow stormwater to be stored until it can infiltrate into the ground to minimize changes in post-development stormwater runoff discharge rates, velocities, and duration . Thus, project development would not result in flooding on- or off-site, and impacts would be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As disused above, the proposed project would modify drainage patterns onsite, but it will discharge runoff to the existing the public storm drain system. The City's existing stormwater infrastructure is currently adequate to accommodate stormwater runoff from the project site. Therefore, impacts would be less than significant and no mitigation measures are necessary.

iv) Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps, The project site is in the Shaded Zone X flood hazard zone as designated by the Federal Emergency Management Agency, indicating that the site is protected from 100-year floods by levees (FEMA 2008). Therefore, no impact to flood flows would occur and no mitigation measures are necessary.

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

No Impact. As noted in Section 3.10.c.iv, above, the project site is not in 100-year flood zone.

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent bodies of water that would pose a flood hazard to the site due to a seiche. The project site is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The project is at an elevation of

approximately 300 feet above sea level and is approximately 24 miles inland from the Pacific Ocean. Therefore, the project site is outside the tsunami hazard zone and would not be affected by a tsunami.

Based on the preceding, the proposed project would not risk release pollutants as the result of floods, tsunami, or seiche. Therefore, no impact would occur and no mitigation measures are necessary

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

No Impact. Water quality in City of Industry is regulated by the Los Angeles Regional Water Quality Control Board and its Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The basin plan contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws. As substantiated in Section 3.10.a, above, the proposed project would not violate any water quality standards and will therefore not obstruct the implementation of the Water Quality Control Plan (Basin Plan). Therefore, no impact would occur and no mitigation measures are necessary.

Additionally, the project site is in the San Gabriel Groundwater Basin. The basin has a Groundwater Quality Management Plan. As substantiated in Sections 3.10.a and b, above, the proposed project would not violate any water quality standards and will not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, no impact would occur and no mitigation measures are necessary.

3.11 LAND USE AND PLANNING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Would the project:

a) Physically divide an established community?

No Impact. As shown in Figure 3, *Aerial Photograph*, the project site is primarily surrounded by industrial uses. The proposed project includes the development of an industrial building on a site currently occupied by industrial uses in a highly industrialized area of the City and is compatible with the surrounding land uses. It would not introduce a new land use that would disrupt existing land use patterns, nor would it introduce a physical barrier that would separate land uses that are not already separated. The proposed project would be developed within the confines of the project site and would not introduce roadways or other infrastructure

improvements that would bisect or transect the neighborhoods. Therefore, no impact would occur and no mitigation measures are necessary.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project site is zoned Industrial, and has a General Plan designation of Employment (Industry 2019; 2014). The proposed industrial warehouse/office is permitted under both the General Plan and zoning designation. The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Therefore, no impact would occur and no mitigation measures are necessary.

3.12 MINERAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Would the project:

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

No Impact. The project site is classified by the California Geologic Survey as Mineral Resource Zone 1 (MRZ-1), indicating that significant mineral deposits are absent or unlikely to be present (CGS 1994). Project development would not cause a loss of availability of a known mineral resource. Therefore, no impact would occur and no mitigation measure are necessary.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. No mining sites are designated in the City of Industry General Plan, and the nearest mine to the site mapped on the Mines Online website is over six miles away (OMR 2020). Additionally, no oil or energy extraction and/or generation activities exist on the project site. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no oil or energy wells located onsite (DOGGR 2020). Project development would not cause a loss of availability of a mining site designated in the City of Industry's General Plan. Therefore, no impact would occur and no mitigation measure are necessary.

3.13 NOISE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

Would the project result in:

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

Less Than Significant Impact.

Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. The City's General Plan identifies land uses particularly sensitive to noise to include residential, school, and open space recreation areas where quiet environments are necessary for enjoyment, public health, and safety.

Existing Noise Environment And Sensitive Receptors

The project site is currently developed with a 52,182 square-foot industrial building located on the center of the project site, and seven above ground storage tanks and a silo in the rear adjacent the railroad tracks. The site is primarily surrounded by industrial uses. According to the City's General Plan EIR (Industry 2014), the ambient noise environment for the project site area is at least 70 dBA CNEL.

The nearest noise-sensitive receptors are single-family residential uses, approximately 1,100 feet to the north across Walnut Creek in the City of Baldwin Park, and to the south in the unincorporated community of

3. Environmental Analysis

Avocado Heights. Both areas are currently exposed to noise from the surrounding commercial, industrial, and residential uses, and nearby traffic along major arterials.

Regulatory Setting

County of Los Angeles Noise Standards Municipal Code

The City's Code contains exterior noise standards only as it pertains to entertainment uses (Chapter 17.12). Therefore, for the purposes of this analysis, County of Los Angeles Noise Ordinances were used to assess project impacts. County of Los Angeles Noise Ordinance (Section 12.08) establishes that the impact would be significant if project-related stationary noise exceeded the exterior noise standards included listed in Table 3-7, *County of Los Angeles Exterior Noise Standards*, below:

Table 3-7 County of Los Angeles Exterior Noise Standards

Noise Zone	Time Period	Maximum Permissible Noise Level (dBA)1,2				
		Standard 1 (L50)	Standard 2 (L25)	Standard 3 (L8)	Standard 4 (L2)	Standard 5 (Lmax)
Noise-Sensitive Area	Anytime	45	50	55	60	65
Residential Properties	10 PM to 7 AM	45	50	55	60	65
	7 AM to 10 PM	50	55	60	65	70
Commercial Properties	10 PM to 7 AM	55	60	65	70	75
	7 AM to 10 PM	60	65	70	75	80
Industrial Properties	Anytime	70	75	80	85	90

Source: County of Los Angeles Municipal Code, Section 12.08.390.
Notes:
1 According to Section 12.08.390, if the ambient noise levels exceed the exterior noise standards above, then the ambient noise level becomes the noise standard. If the source of noise emits a pure tone or impulsive noise, the exterior noise levels limits shall be reduced by five decibels.
2 If the measurement location is on a boundary property between two different zones, the noise limit shall be the arithmetic mean of the maximum permissible noise level limits of the subject zones; except when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level shall be the daytime exterior noise level for the subject receptor property.

City of Industry General Plan

The City's General Plan includes the following goals and policies that relate to noise:

- **Goal S6:** An environment where noise does not adversely affect sensitive land uses.
- **Policy S6-**1: Coordinate with Caltrans, San Gabriel Valley Council of Governments, Southern California Association of Governments, neighboring jurisdictions, and other transportation providers in the preparation and maintenance of transportation and land use plans to minimize noise impacts and provide appropriate mitigation measures.
- **Policy S6-2**: Address noise impacts through the effective enforcement of the noise ordinance, project and environmental review, and compliance with state and federal noise standards.
- **Policy S6-3**: Consider the noise levels likely to be produced by any new businesses or substantially expanded business activities locating near existing noise-sensitive uses such as schools, community facilities, and residences, as well as adjacent to established businesses involving vibration-sensitive activities.

NOISE IMPACT ASSESSMENT

The generation of noise and vibration associated with the proposed project would occur over the short-term for site construction activities. In addition, noise would result from the long-term operation of the project. Both short-term and long-term noise impacts associated with the project are examined in the following analyses that correspond to the CEQA Guidelines.

Road Noise

Per the traffic analysis, the project is estimated to generate a maximum of 134 trips during weekday peak hours. In comparison to existing traffic on East Temple Avenue, 13,745 ADT (LA County Public Works 2019), project contribution represents a worst-case increment of less than 1 percent. This small increment in flows translates into less than 0.1 dB of traffic-generated noise, which is completely negligible in comparison to existing traffic flows on nearby streets. As such, the project-generated noise increases on East Temple Avenue would be well below the threshold of audibility and well below the 3 dB threshold of significance. Thus, traffic noise increases in the area surrounding the project site would be less than significant and no mitigation measures are necessary.

Construction Noise

The total duration for project construction is approximately eight months. Construction equipment for the proposed project could include equipment such as grader, tractor, loader, forklift, air compressor, paving machine, and trucks. Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA L_{max} at 50 feet from the worker and vendor vehicles and haul trucks; however, this would occur along roadways in industrialized areas. Based on the applicant's development plans, the proposed project site would be balanced, and there would be no import or export of soils, reducing the number of construction vehicle trips. Therefore, noise impacts from construction haul trips would be less than significant.

Construction Equipment

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each phase of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest piece or pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The nearest residential property line is approximately 1,100 feet to the north across Walnut Creek. The I-605 and I-10 freeways are located approximately 0.2 miles to the west and 0.5 miles to the north from the project site. Due to close proximity of the two freeways, construction noise would be overshadowed by traffic noise

on I-605 and I-10. Additionally, compliance with the Los Angeles County noise regulations would ensure noise levels from construction equipment would be less than significant.

Operational Noise

Stationary Mechanical Equipment

On-site heating, ventilation, and air conditioning (HVAC) units and associated equipment attached to the warehouse structure would be acoustically engineered with appropriate procurement specifications, sound enclosures, and parapet walls to minimize noise; all in accordance with City of Industry/County of Los Angeles noise standards listed above to ensure that such equipment does not exceed allowable noise limits.

The project site is primarily surrounded by industrial uses. Due to distance of at least 1000 feet from the project site to the nearest residential property line, the operation of rooftop HVAC units at the project buildings would generally be overshadowed by traffic flow noise on the nearest freeway. Due to distance, traffic noise, and compliance with pertinent local noise regulations, noise levels from project operation would be less than significant.

Loading Docks

In addition to the stationary mechanical equipment sources, there would be noise sources associated with ongoing operations at the project site; such as truck loading and unloading noise. However, these types of noise sources are the same as sources surrounding the project site. On the northern border of the project site is an industrial warehouse with locking docks. Additionally, there are no sensitive receptors in the immediate vicinity of the project site. Therefore, permanent noise increases due to project-related stationary sources would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Potential vibration impacts associated with industrial development projects are usually related to the use of heavy construction equipment during (a) demolition and grading phases of construction and/or (b) the operation of heavy equipment or large truck movements over uneven surfaces during project operations.

Construction Activities

Overall, project construction is expected to be eight months. Construction activities can generate ground vibration that varies depending on the construction procedures, equipment used, and proximity to vibration-sensitive uses. Construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance. Such vibrations may have two types of potential impacts: (a) architectural damage to nearby buildings and (b) annoyance to vibration-sensitive receptors.

The project site is a relatively flat and currently developed with a vacant industrial building, a railroad spur, seven raised tanks and a silo. Demolition activities will require the use of two excavators, one water truck for dust control, two bobcats, and one dozer. Grading activities will require the use of one water truck, two

excavators, and two scrapers. The use of high-vibration equipment, such as pile drivers or vibratory rollers, is not anticipated.

Table 3-8, *Typical Vibration Levels Produced by Common Construction Equipment*, shows the typical vibration levels (in terms of peak particle velocities, PPV, and vibration velocity decibels, VdB) of some common construction equipment and haul trucks (loaded trucks). Potential vibration effects that could result in architectural damage are typically evaluated in terms of the peak particle velocity (PPV) metric, while vibration annoyance effects are typically evaluated in terms vibration decibels (VdB).

Table 3-8 Noise Levels Generated by Typical Construction Equipment

Type of Equipment	Average Sound Levels Measured (dBA at 50 feet)
Pile Drivers	101
Rock Drills	98
Jack Hammers	88
Pneumatic Tools	85
Pumps	76
Dozers	80
Front-End Loaders	79
Hydraulic Backhoe	85
Hydraulic Excavators	82
Graders	85
Air Compressors	81
Trucks	91

Source: Bolt, Beranek and Newman, 1971.

Vibration-induced Architectural Damage

The threshold at which there is a risk of architectural damage to typical wood-framed buildings is 0.2 in/sec and the threshold for reinforced steel concrete structures is 0.5 in/sec (FTA 2006). Building damage is not normally a factor unless the project requires blasting and/or pile driving (FTA 2006). No blasting, pile driving, or hard rock ripping/crushing activities are anticipated for the proposed project. In contrast, small construction equipment generates vibration levels less than 0.1 PPV in/sec at 25 feet away.

The most vibration-intensive piece of equipment anticipated to be used during project construction is a bulldozer, which generates a vibration level of 0.089 PPV in/sec at a distance of 25 feet. The nearest structure to the project site is the adjacent industrial building, approximately 59.7 feet to the south from the project boundary. Since the nearest structure is more than 25 feet from the project site, Therefore, vibration levels at this structure would be well below the threshold for architectural damage. Impacts would be less than significant and no mitigation measures are necessary.

Vibration Annoyance

Vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. It is typically not perceptible outdoors, and therefore impacts are based on the distance to the nearest

building (FTA 2006). The effect on buildings near a construction site depends on soil type, ground strata, and receptor building construction. Vibration can range from no perceptible effects at the lowest levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. As such, vibration annoyance is typically assessed via a spatial-averaging methodology (i.e., as heavy construction equipment moves around the project site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment). This methodology is implemented by using the distance from the center of the construction zone to the nearest sensitive receptors.

Vibration dissipates quickly with distance, and the nearest sensitive receptors are at least 1,000 feet from the construction zone (using this spatial average methodology). Additionally, construction would take place during the least sensitive hours of the day. The industrial uses adjacent to the project site would not be considered to be vibration sensitive receptors. Therefore, vibration annoyance impacts from construction would be less than significant and no mitigation measures are necessary.

Operational Activities

The proposed project would include truck movement activity on the project site. The movement of trucks would not be able to generate notable level of groundborne vibration since (a) there would not be major surface discontinuities in the finished surfaces and (b) such trucks would not be traveling at substantial-enough speeds to create vibrational impulses. Therefore, no significant vibration effects or impacts from operations sources would occur, and no mitigation measures are necessary.

In summary, both operational and construction vibration effects (both in terms of architectural damage and annoyance effects) would be less than significant and would not require mitigation measures.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not within an airport land use plan and there are no public airports or private airstrips within two miles of the site. The nearest airport to the project site is the San Gabriel Airport, approximately 2.6 miles to the northwest. Additionally, while there are no private airstrips near the project site, there are private and government operated helipads located within the vicinity of the proposed project site. Development of the industrial warehouse would not result in a change in flight patterns that would increase noise levels in the vicinity of the project site. Therefore, no impact would occur and no mitigation measures are necessary.

3.14 POPULATION AND HOUSING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. No residential development is proposed under the proposed project; therefore, the proposed project would not directly induce population growth in the area. The proposed industrial warehouse would be developed to serve the warehousing and distribution needs of the region and would not indirectly cause population growth. Additionally, as discussed in Section 3.19, *Utilities and Service Systems*, adequate infrastructure and utilities are available to serve the project site and the proposed project would not require new infrastructure or extension of existing infrastructure that may indirectly induce population growth nearby. The new utility lines that would be provided onsite would not extend into undeveloped areas nor result in unplanned growth. The project site is also provided with adequate road access and project development would not require extension of roadways. Therefore, no impact to population and housing would occur and no mitigation measures are necessary.

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

No Impact. No housing exists on the project site, which is developed with a 52,182 square-foot industrial building, seven raised tanks and a silo in the back yard (see Figure 3, *Aerial Photograph*). Therefore, project development would not displace housing or people. No impact would occur and no mitigation measures are necessary.

3.15 PUBLIC SERVICES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			X	
Fire protection?			X	
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

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

a) Fire protection?

Less Than Significant Impact. The Los Angeles County Fire Department (LACoFD) provides fire protection and emergency medical services to the City. The nearest fire station to the project site is Station 87 at 140 South 2nd Street in the City of Industry, approximately 0.9 miles to the southeast. Project implementation would result in a slight increase in calls for fire protection and emergency medical service. However, considering the incremental increase in site intensity due to the existing industrial uses on-site, as well as the existing firefighting resources available in and near the City, project impacts on fire protection and emergency services (including response times) are not expected to occur. Additionally, in the event of an emergency at the project site that required more resources than Station No. 87 could provide, LACoFD would direct resources to the site from other nearby stations within the City and, if needed, would request assistance from other nearby fire departments.

Furthermore, project development is required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACoFD, which impose design standards and requirements that seek to minimize and mitigate fire and emergency response risk. Compliance with these codes and standards is ensured through the City's and LACoFD's development review and building permit process.

Based on the preceding, the proposed project would not adversely affect the LACoFD's ability to provide adequate service and would not require new or expanded fire facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant and no mitigation measures are necessary.

b) Police protection?

Less Than Significant Impact. The Los Angeles County Sheriff 's Department (LASD) provides police protection to the City. The nearest LASD station to the project site is the Industry Station at 150 North Hudson Avenue in the City of Industry, approximately three miles to the southeast. Project implementation would result in a slight increase in calls for police protection service. However, considering the incremental increase in site intensity due to the existing industrial uses on-site, as well as the existing police resources available in and near the City, project impacts on police services (including response times) are not expected to occur. Additionally, in the event of an emergency at the project site that required more resources than the LASD could provide, LASD would request assistance from other nearby police departments.

Furthermore, the City involves LASD in the development review process in order to ensure that the necessary police protection features are incorporated into development projects. All site and building improvements proposed under the proposed project would be subject to review and approval by LASD.

Based on the preceding, the proposed project would not adversely affect LASD's ability to provide adequate service and would not require new or expanded police facilities that could result in adverse environmental impacts. Impacts would be less than significant and no mitigation measures are necessary.

c) Schools?

No Impact. The increase in student generation and the need for new or the expansion of existing school facilities is tied to population growth. No residential development is proposed under the proposed project, and project development is not expected to generate an increase in the student population in the area. Therefore, no impacts to schools would occur and no mitigation measures are necessary.

d) Parks?

No Impact. Demand for parks is generated by the population within each park's service area. No residential development is proposed under the proposed project, and project development is not expected to generate a need for new parks. Therefore, no impact to parks would occur and no mitigation measures are necessary.

e) Other public facilities?

No Impact. The need for new or the expansion of existing library services and facilities is tied to population growth. No residential development is proposed under the proposed project, and project development is not expected to generate a need for new or additional library services or facilities. Therefore, no impact to libraries would occur and no mitigation measures are necessary.

3.16 RECREATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The increase in the use of existing parks and recreational facilities and the need for new or the construction or expansion of existing recreational facilities is tied to population growth. No residential development is proposed as a part of the project; therefore, no population growth or increase in the use of existing parks or other recreational facilities would occur. Therefore, no impact on parks and recreational facilities would occur and no mitigation measures are necessary.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. The proposed project does not involve the development of recreational facilities; and project development would not require construction of new or expanded recreational facilities, as noted in Section 3.16.a, above. Therefore, no impact would occur and no mitigation measures are necessary.

3.17 TRANSPORTATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?			X	

The analysis in the section is based party on the following technical study, which is included as Appendix D to this Initial Study.

- *Trip Generation Study for a Proposed Project Located at 13055 Temple Avenue, City of Industry*, *Blodgett Baylosis Environmental Planning*, 2020, February 15.

Would the project:

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

Less Than Significant Impact.

Impacts to Roadway Facilities

Blodgett Baylosis Environmental Planning prepared a traffic memorandum to determine the anticipated traffic generation from the proposed project. The traffic memorandum evaluated the existing traffic trip generation from the previous development and estimated the trip generation potential of the proposed project.

Methodology

It is important to note that the environmental setting normally constitutes the baseline physical conditions by which a lead agency determines whether an impact is significant (CEQA Guidelines Section 15125(a)). However, pursuant to the *North County Advocates v. City of Carlsbad (2015) 241 Cal.App. 4th 94,* lead agencies have discretion to consider conditions over a range of time periods to account for a temporary lull or spike in operations. As with any warehouse operation, this warehouse experiences periodic transitions in tenants and occupancy. The warehouse was in continuous operations from 1970, and is currently undergoing decommissioning and the ink production machinery is being removed. Therefore, for the purpose of the proposed project, the environmental analysis considers full occupancy associated with historical operations of the warehouse use that was vacated as the baseline for the transportation analysis.

Trip generation was calculated based on rates in the ITE Trip Generation Manual (10th edition) and the trip generation for warehouse/storage land uses (ITE Land Use Code 150) was used. This ITE land use category was selected since it better characterized both the previous and proposed uses for the project site. For warehouse uses, vehicle trips were also identified in terms of vehicle modal splits, i.e. cars and trucks. Passenger cars typically accounted for approximately 80 percent of the total traffic generated, while multiple axle trucks accounted for the remaining 20 percent.

3. Environmental Analysis

Previous Trip Generation

As shown in Table 3-9, *Trip Generation for Previous Use,* the previous uses at the project site generated 90 average daily trips, nine trips during the AM peak hour; and 10 trips during the PM peak hour. 72 daily trips would be from automobiles, and 18 daily trips would be from multi-axle trucks.

Table 3-9 Trip Generation for Previous Use

Trip Generation Rates									
				AM Peak Hour			PM Peak Hour		
ITE Land Use	ITE Code	Unit	Daily	In	Out	Total	In	Out	Total
Warehousing	150	KSF	1.74	77%	23%	0.17	27%	73%	0.19
Trip Generation for Previous Use									
				AM Peak Hour			PM Peak Hour		
Category	Size	Unit	Daily	In	Out	Total	In	Out	Total
Total	**52,182**	**KSF**	**90**	**7**	**2**	**9**	**3**	**7**	**10**
Car (80%)	-	-	72	6	2	8	2	6	8
Multi Axle Trucks (20%)	-	-	18	1	0	1	1	1	2

Source: ITE, 10th Edition

Project Trip Generation

Table 3-10, *Project Trip Generation*, shows the proposed project trip generation based on 76,877 square feet of warehousing (compared to 52,182 square feet of previous uses) for the AM peak hour and PM peak hour. As shown, the proposed project is expected to generate 134 average daily trips, 13 trips during the AM peak hour; and 15 trips during the PM peak hour. 107 daily trips would be from automobiles and 27 daily trips would be from multi-axle trucks. The proposed project would result in an increase of 44 average daily trips, 4 trips during the AM peak hour; and 5 trips during the PM peak hour. Pursuant to the Los Angeles County Traffic Impact Analysis Report Guidelines (January 1, 1997), the minimum criteria for a traffic impact assessment is if the proposed project will add 50 or more trips during either AM or PM weekday peak hour on arterial monitoring intersections, including monitored freeway onramps or off-ramps or 150 or more trips at mainline freeway monitoring location. Since the net increase in peak hour traffic volumes will be less than 50 trips, no further traffic analysis will be required for the proposed project. Therefore, impacts to roadway facilities would be less than significant and no mitigation measures are necessary.

Table 3-10 Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Category	Size	Unit	Daily	In	Out	Total	In	Out	Total
Total	**76,877**	**KSF**	**134**	**10**	**3**	**13**	**4**	**11**	**15**
Car (80%)	-	-	107	8	2	10	3	9	12
Multi Axle Trucks (20%)	-	-	27	2	1	3	1	2	3

Source: ITE, 10th Edition

Impacts to Alternated Modes of Transportation Facilities

As shown in Figure 4, *Proposed Site Plan*, pedestrian access to the project site would be provided via a new internal walkway leading to the main building entrances and connected to the public sidewalk on East Temple Avenue. The proposed project would not alter the existing public sidewalk.

There are no bicycle lanes or facilities adjacent to or within proximity of the project site. However, the proposed project would provide bicycle parking onsite. Two bicycle racks would be provided with six short term spaces at the front entrance of the building, and six long term spaces inside the building near the loading dock.

Los Angeles Metro and Foothill transit provide public transit bus services within the vicinity of the project site. The following is a description of the bus routes passing near the project site:

- **Line 274**: Has approximately 15- to 30-minute frequencies and runs from Whitter to Baldwin Park. Near the site the bus travels along Puente Avenue. The closest stop to the project site is at Puente Avenue and East Temple Avenue.
- **Avocado Heights/ Bassett/ West Valinda Shuttle**: Has approximately 10- to 15-minute frequencies and runs from Avocado Heights Park to Pelisse Village. Near the site the bus travels along Vineland Avenue. The closest stop to the project site is at Vineland Avenue and East Temple Avenue.

During construction, the project may have the potential to cause temporary closure of the sidewalks adjacent the project site, or increase safety hazards, due to construction vehicles entering and exiting the project site (e.g., for delivery of building materials). Signage and/or workers conducting traffic would be present to direct pedestrians.

The proposed project would provide means for alternative transportation and would be accessible by public transportation for employees. As such, the proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing the alternate mode of transportation facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

No Impact. The legislature found that with adoption of Senate Bill 375, the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of GHG, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB 32]). Additionally, AB 1358 (Complete Streets Act) requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

On September 27, 2013, SB 743 was signed into law. SB 743 started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). As part of the updated CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section

21099(b)(1)). On January 20, 2016, OPR released revisions to its proposed CEQA guidelines for the implementation of SB743. Final review and rulemaking for the new guidelines were completed in December 28, 2018 when the California Natural Resource Agency certified and adopted the CEQA Guidelines update package, including guidelines section implementing Senate Bill 743. On June 25, 2020, the City of Industry adopted Resolution CC2020-20 that adopted VMT thresholds for the purpose of analyzing transportation impacts under the California Environmental Quality Act.

VMT is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1) number of daily trips and (2) the average trip length (VMT= daily trips x average trip length). The City utilized guidance provided by both the San Gabriel Valley Council of Governments (SCVOG) and OPR. The City determined that the appropriate baseline VMT for projects. The Baseline VMT is defined as the average VMT for the City of Industry at the time of the Notice of Preparation (or Notice of Intent for Negative and Mitigated Negative Declarations) release. The specific form of the metric depends o n the type of project and may be measured by VMT per capita, VMT per employee, or VMT by service population.

OPR provided guidance for projects to be screened out form potential impacts. The City determined, consistent with OPR's guidance, that four categories of projects would qualify to be screened out from further analysis:

- **Project Type Screening** – Retail projects less than 50,000 square feet in floor area and projects generating less than 110 trips daily.
- **Low VMT Screening** – Projects located in low VMT areas. The project must be similar in nature to the type of land use in the proposed area or complement existing land uses such that the project would generate VMT at similar rates to existing land uses. Low VMT is defined as being below the Baseline VMT.
- **Transit Priority Area (TPA) Screening** – Transit Priority Areas are defined as an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon year. A major transit stop is defined as a site containing an existing rail transit station, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute hours.
- **Affordable Housing Screening** – Affordable housing development or affordable housing units within mixed-use developments, pursuant to Sections 15183.3 and 15332 of Title 14 of the California Code of Regulations are deemed screened out from further analysis.

Utilizing the SGVOG VMT Evaluation Tool, the proposed project was determined to be screened out from further analysis as the project is located in a Low VMT zone. As such, no further analysis is required and impacts would be less than significant.

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

No Impact. As shown in Figure 4, *Proposed Site Plan*, vehicular access for the project site would be provided via two 40-foot wide driveways connection via East Temple Avenue, similar to existing conditions. Design and construction of the proposed access and circulation improvements would be required to adhere to the City's engineering standards, which are imposed on development projects during the City's development plan review process. For example, at intersections and project driveways, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad, and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Based on a review of the proposed site plan (see Figure 4) and Google Earth maps, there are no restrictions blocking views from the driveways on East Temple Avenue and east- and west traffic on these roadways, and sufficient sight distance would be provided. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the project site.

Furthermore, the proposed project would provide a network of low-speed internal drive aisles that would be safe and walkable for pedestrians, while maintaining an efficient circulation system for trucks and vehicles. The proposed project would also not include incompatible uses such as farm equipment on area roadways. Therefore, no impact resulting from hazards due to design features or incompatible uses would occur and no mitigation measures are necessary.

d) Result in inadequate emergency access?

Less Than Significant Impact. As outlined above, vehicular access for the project site would be provided via two driveways connection via East Temple Avenue. To address emergency and fire access needs, a 28-foot fire lane would be provided at the project site to meet the minimum width requirements for allowing the passing of emergency vehicles. The proposed project would be to be designed and constructed in accordance with all applicable City's design standards for emergency access (e.g., minimum lane width and turning radius).

Additionally, during the development review and building plan check process, the City would coordinate with LACoFD and LASD to ensure that the necessary fire prevention and emergency response features are incorporated into the project and that adequate circulation and access (e.g., adequate turning radii for fire trucks) are provided within the traffic and circulation components of the proposed project. For example, Knox Boxes (or other approved means of emergency access to the site) would be placed where necessary (i.e., automated rolling security gates) to provide access for emergency personnel. Therefore, the proposed project would not result in inadequate emergency access. Impacts would be less than significant and no mitigation measures are necessary.

3.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. As shown in Figure 3, *Aerial Photograph*, the project site is currently developed with a vacant industrial building, a railroad spur, seven raised tanks and a silo. The project site was previously used for production, laboratory, storage and office operations for ink manufacturing. Project development would involve demolition of the vacant building and other site improvements. The project site is not identified on any federal or state historic registers or sources, including the National Register of Historic Places and California State Historical Landmarks and Points of Historical Interest (NPS 2020, OHP 2020). Therefore, no impact to historical resources would occur and no mitigation measures are necessary.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource

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

Less Than Significant Impact. As of July 1, 2015, Public Resources Code Sections 21080.1, 21080.3.1, and 21080.3.2 require public agencies to consult with California Native American tribes recognized by the Native American Heritage Commission (NAHC) for the purpose of mitigating impacts to tribal cultural resources. This law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions.

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation for tribal cultural resources. The Gabrieleno Band of Mission Indians – Kizh Nation and the Soboba Band of Luiseno Indians are on the City's notification list pursuant to AB 52. In accordance with the provisions of AB 52, the City notified both tribes on April 9, 2020. However, neither the Gabrieleno Band of Mission Indians – Kizh Nation, nor the Soboba Band of Luiseno Indians responded to the Planning Department and no response has been received as of the publication date of this MND. Therefore, the City has complied with its obligation under AB 52 and the consultation process was deemed complete.

The project site is also heavily disturbed from its historical industrial use and therefore has already been subject to similar construction and ground-disturbing activities that would occur under the proposed project. No evidence or readily available records exist to indicate that tribal cultural resources were identified during prior disturbance and development of the project site, and it is unlikely that any such resources would be uncovered or affected during project-related grading and construction activities.

Based on the foregoing, impacts to tribal cultural resources would be less than significant and no mitigation measures are necessary.

3.19 UTILITIES AND SERVICE SYSTEMS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	

3. Environmental Analysis

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Would the project:

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

Less Than Significant Impact.

Water Treatment Facilities

San Gabriel Valley Water Company (SGVWC) would provide potable water to the project site. SGVWC obtains its water supplies from two sources, 31 wells located in the Main San Gabriel Groundwater Basin and from 4 wells located in the Central Groundwater Basin (SGVWD 2020). As shown in Table 3-11, *Proposed Project Water Demands*, projected water demand for the proposed project is expected to be 3,205 gpd. Water will also be used landscaping. SGVWC estimates that it will have sufficient water supplies to meet proposed growth for normal, single-dry, and multiple-dry years (SGVWD 2017). Therefore, project development would not require the construction of new or expanded water treatment facilities. Impacts would be less than significant and no mitigation measures are necessary.

Table 3-11 Proposed Project Water Demands

Land Use	Square Feet	Indoor Generation Rate (gpd/square feet) [1]	Outdoor Water Use (gallons/year) [2]	Total (gpd)
Warehousing	67,383	0.0278	—	1,873
Office Use	6,000	0.222	—	1,332
Total	—	—	—	**3,205**

Source: LACSD 2020; DWR 2017
Notes: gpd = gallons per day
[1] LACSD provides loading rates for wastewater for specific land uses. It is assumed that wastewater generation is 90 percent of indoor water use. The wastewater generation rate for an office building is 200gpd/1,000 square feet. For a warehouse facility, the generation rate is 25 gpd/1,000 square feet.
[2] Outdoor water use is based on the California Department of Water Resources' Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes. Precipitation for the City of Los Angeles was used.

Wastewater Treatment Facilities

Wastewater generated by the land uses in the City is treated by the Sanitation Districts of Los Angeles County (LACSD). Wastewater is collected within the City's local sewer collection system. The City's local sewers tie into one of LACSD's regional trunk sewers. Wastewater from the City's service area is collected and treated at the San Jose Creek Water Reclamation Plant (SJCWRP) in unincorporated Los Angeles County near the western boundary of the City of Industry. The SJCWRP has capacity of 100 mgd and average wastewater flows of 48 mgd, for remaining capacity of 52 mgd (LACSD 2019). The amount of wastewater that would be generated by the proposed project is conservatively assumed to be 2,885 gallons per day, which is 90 percent of indoor water use. The amount of wastewater that would be generated is much less than one percent of SJCWRP's total remaining daily treatment capacity. Therefore, project development would not require the construction of new or expanded wastewater treatment facilities. Impacts would be less than significant and no mitigation measures are necessary.

Stormwater Drainage Facilities

See response to Section 3.10.c.iii, above. As substantiated in this section, impacts would be less than significant and no mitigation measures are necessary.

Electricity Facilities

Electrical needs to the project site would be provided by Southern California Edison (SCE) via existing infrastructure in the immediate area of the project site. Electric power uses under the proposed project will include indoor lighting, electric vehicle charging, office appliances, perimeter lighting, and security systems. All utility connections to the proposed project would be required to comply with applicable federal, state, and local regulations related to electric power supply. Therefore, relocation and expansion of existing facilities and construction of new facilities would not be required. Impacts would be less than significant and no mitigation measures are necessary.

Natural Gas Facilities

Natural gas needs to the project site would be provided by the Southern California Gas Company (SoCalGas) via existing infrastructure in the immediate area of the project site. Natural gas would be used for Heating Ventilation and Air Conditioning (HVAC) systems and hot water heaters. Total natural gas supplies available to SoCalGas are forecast to remain constant at 3,775 million cubic feet per day (MMCF/day) from 2020 through 2035. Total natural gas consumption in SoCalGas' service area is forecast to decline slightly from 2,625 MMCF/day in 2018 to 2,313 MMCF/day in 2035 (CGEU 2018).

SoCalGas projects that it will have sufficient supplies to meet the demands in its service area. Therefore, the proposed project's natural gas demand is within SoCalGas' forecast increase and the project would not require SoCalGas to obtain new or expanded natural gas supplies. Impacts would be less than significant and no mitigation measures are necessary.

Telecommunication Facilities

Various private services, including AT&T, Time Warner, and Frontier Communications, provide telecommunication services to the City, including the project site. No changes to telecommunication facilities would occur. Therefore, project development would not require the construction of new or expanded telecommunication facilities. Impacts would be less than significant, and no mitigation measures are necessary.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As substantiated above in Section 3.19.a., SGVWC will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry and multiple dry years (SGVWD 2017). Additionally, the proposed project's landscaping would be required to comply with Chapter 13.18 (Water Efficient Landscapes) of the City of Industry Municipal Code, which sets landscape design standards for water conservation. Therefore, impacts on water supplies due to project development would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. As substantiated above in Section 3.19.a, there is existing wastewater treatment capacity in the region for estimated project wastewater generation. Project development would not require construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. In 2008, 83 percent of solid waste generated in the City are disposed at Sunshine Canyon City/County Landfill, El Sobrante Landfill, and Olinda Alpha Sanitary Landfill (CalRecycle 2020a). Capacity and disposal data for the three landfills are shown in Table 3-12, *Landfill Capacity*. As shown in the table, the landfills have a combined residual capacity of over 10,698 tons per day.

Table 3-12 Landfill Capacity

Landfill	Current Remaining Capacity (Cubic Yards)	Maximum Permitted Throughput/day (tons)	Average Daily Disposal, 2018 (tons)[1]	Residual Daily Disposal Capacity (tons)	Estimated Close Date
Sunshine Canyon City/County Landfill	77,900,000	12,100	7,036	5,064	2037
El Sobrante Landfill	143,977,170	16,054	11,288	4,766	2051
Olinda Alpha Sanitary Landfill	34,200,000	8,000	7,132	868	2021
Total	**256,077,170**	**36,154**	**25,456**	**10,698**	**N/A**

Source: CalRecycle 2020b, 2020c, 2020d, 2020e
[1]Average daily disposal is calculated based on 300 operating days per year. Each of the three facilities is open six days per week, Monday through Saturday, except certain holidays.

Project operation is estimated to generate about 993 pounds of solid waste per day, or 0.5 ton per day, as shown below in Table 3-13, *Estimated Project Solid Waste Generation*. Therefore, there is adequate residual landfill capacity in the region for project-generated solid waste, and project development would not require new or expanded landfills. Impacts to solid waste would be less than significant and no mitigation measures are necessary.

Table 3-13 Estimated Project Solid Waste Generation

Land Use	Square Feet	Generation Rate (lb/square feet/day)	Total (ppd)
Warehouse	67,383	0.0142	957
Office	6,000	0.006	36

Source: CalRecycle 2020f.
ppd=pounds per day

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

Less Than Significant Impact. The following federal and state laws and regulations govern solid waste disposal:

- **AB 939 (Chapter 1095, Statutes of 1989)**, the California Integrated Waste Management Act of 1989 required each city, county, and regional agency to develop a source reduction and recycling element of an integrated waste management plan that contained specified components, including a source reduction component, a recycling component, and a composting component. With certain exceptions, the source reduction and recycling components were required to divert 50 percent of all solid waste from landfill disposal or transformation by January 1, 2000, through source reduction, recycling, and composting activities.
- **AB 32 (Chapter 488, Statutes of 2006)**, the California Global Warming Solutions Act, established mandatory recycling as one of the measures to reduce GHG emissions adopted in the Scoping Plan by the California Air Resources Board.
- **AB 341 (Chapter 476, Statutes of 2011)** requires that all "commercial" generators of solid waste (businesses, institutions, and multifamily dwellings) establish recycling and/or composting programs. AB 341 goes beyond AB 939 and establishes the new recycling goal of 75 percent by 2020.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations govern solid waste disposal. Therefore, impact would be less than significant and no mitigation measures are necessary.

3.20 WILDFIRE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Wildland fire protection in California is the responsibility of either the local government, state, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA covers a total of over 31 million acres, to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. LACoFD currently provides fire protection and emergency medical services to the City. Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The proposed project is not located within a state responsibility area or land classified as a very high fire hazard severity zone, as identified in the Los Angeles County Fire Hazard Severity Zone Map (CAL FIRE 2007b).

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

No Impact. As demonstrated above, the project site is not in or near an SRA or LRA or lands classified as high fire severity zones. Additionally, the Los Angeles Emergency Operations Plan (EOP) was approved by County Board of Supervisors in 2012. Implementation of the proposed project would not have a significant impact on implementation of the EOP, as substantiated in Section 3.9(f), above. Therefore, no impact would occur and no mitigation measures are necessary.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As demonstrated above, the project site is not in or near an SRA or LRA or lands classified as high fire severity zones.

Wildfire risk is the damage a fire can do to values at risk in the area—such as people, structures, and natural resources such as habitat or timber—under existing and future conditions (CAL FIRE 2007a). Project development would not add wildland vegetation to the project site. Development would also not change site topography (such as adding large slopes) so as to exacerbate wildfire spread.

Therefore, development of the proposed project would not result in the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope and prevailing winds. No impact would occur and no mitigation measures are necessary.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As demonstrated above, the project site is not in or near an SRA or LRA or lands classified as high fire severity zones. Additionally, project development would not involve installation and maintenance of infrastructure including roads and power lines. Therefore, no impact would occur and no mitigation measures are necessary.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As demonstrated above, the project site is not in or near an SRA or LRA or lands classified as high fire severity zones. The topography of the project site is relatively flat, and the soils on the proposed project site are not susceptible to landslides Additionally, implementation of the proposed project would not alter the existing drainage patterns or substantially increase the amount of runoff because stormwater would be conveyed through an existing stormwater drainage system. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. No impact would occur and no mitigation measures are necessary.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact With Mitigation Incorporated. As substantiated in Section 3.4, Biological Resources, implementation of the proposed project would not result in the reduction of the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal.

Furthermore, as substantiated in Section 3.5, Cultural Resources, no historic resources were identified onsite and, therefore, the project site does not have the potential to eliminate important examples of California history or prehistory. Additionally, the potential for undiscovered archaeological resources, paleontological resources, or human remains to be encountered during grading activities at the project site is low. However, compliance with mitigation measure CUL-1 would ensure that impacts to archeological resources do not occur.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable

when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The issues relevant to project development are confined to the immediate project site and surrounding area. Additionally, the project site is in a highly urbanizing area of the City where supporting utility infrastructure (e.g., water, wastewater, electricity, natural gas, and drainage) and services (e.g., solid waste collection) currently exist. Project implementation would not require the construction of new or expansion of existing utility infrastructure and services.

Furthermore, impacts related to other topical areas such as air quality, GHG, hydrology and water quality, and traffic would not be cumulatively considerable with development of the project in conjunction with other cumulative projects.

In consideration of the preceding factors, the project's contribution to cumulative impacts would be rendered less than significant; therefore, project impacts would not be cumulatively considerable.

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

Less Than Significant Impact. As discussed in the respective topical sections of this Initial Study, implementation of the project would not result in significant impacts in the areas of GHG, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, or wildfire, which may cause adverse effects on human beings. Therefore, impacts related to these environmental effects were deemed to be less than significant.

3. Environmental Analysis

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4. References

Bay Area Air Quality Management District (BAAQMD). 2017, May. California Environmental Quality Act Air Quality Guidelines.

California Air Pollution Control Officers Association (CAPCOA). 2017. California Emissions Estimator Model (CalEEMod). Version 2016.3.2.25. Prepared by: BREEZE Software, A Division of Trinity Consultants in collaboration with South Coast Air Quality Management District and the California Air Districts.

California Air Resources Board (CARB). 2005, April. Air Quality and Land Use Handbook: A Community Health Perspective. https://www.arb.ca.gov/ch/handbook.pdf.

———. 2017a, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. https://www.arb.ca.gov/cc/shortlived/shortlived.htm.

———. 2017b, October 18. Area Designations Maps/State and National. http://www.arb.ca.gov/desig/desig.htm.

———. 2017c, November. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

California Department of Conservation, Division of Land Resource Protection (DLRP). 2016. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/.

California Department of Fish and Wildlife (CDFW). 2019, April. California Natural Community Conservation Plans. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline.

———. 2020. Biogeographic Information and Observation System (BIOS). https://apps.wildlife.ca.gov/bios/.

California Department of Forestry and Fire Protection (CAL FIRE). 2007a, May. Fire Hazard Severity Zone Model: A Non-technical Primer. https://www.sccgov.org/sites/dpd/DocsForms/Documents/FIreHazardZone_NonTechnical_Primer.pdf

———. 2007b, November. Fire Hazards Severity Zones in SRA. https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf.

4. References

California Department of Transportation (Caltrans). 2020. California Highway System. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=026e830c914c495797c969a3e5668538

California Department of Resources Recycling and Recovery (CalRecycle). 2020a. Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility. https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility.

———. 2020b. SWIS Facility Detail Sunshine Canyon City/County Landfill (19-AA-2000). https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000/.

———. 2020c. SWIS Facility Detail El Sobrante Landfill (33-AA-0217). https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217/.

———. 2020d. SWIS Facility Detail El Sobrante Landfill (33-AA-0217). https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217/.

———. 2020e. Landfill Tonnage Reports. https://www2.calrecycle.ca.gov/LandfillTipFees/.

———. 2020f. Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates.

California Department of Water Resources (DWR). 2017, June 13. Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes. https://www.google.com/search?q=Water+Budget+Workbook+for+New+and+Rehabilitated+Non-Residential+Landscapes.&oq=Water+Budget+Workbook+for+New+and+Rehabilitated+Non-Residential+Landscapes.&aqs=chrome..69i57.622j0j9&sourceid=chrome&ie=UTF-8.

California Division of Oil, Gas, and Geothermal Resources (DOGGR). Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/#/-118.00142/34.03636/15.

California Gas and Electric Utilities (CGEU). 2018. 2018 California Gas Report.https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

California Geological Survey (CGS). 1994. Generalized Mineral Land Classification Map of Los Angeles County: South Half. Open File Report 94-14, Plate 1B. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf.

———. 1999, March 25. Earthquake Zones of Required Investigation Baldwin Park Quadrangle. https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/BALDWIN_PARK_EZRIM.pdf.

———. 2010. Fault Activity Map of California. Accessed April 2, 2020. https://maps.conservation.ca.gov/cgs/fam/.

California State Parks, Office of Historic Preservation (OHP). 2020. California Historical Landmarks By County. https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19.

4. References

Federal Emergency Management Agency (FEMA). 2008, September 26. FEMA Flood Map Service Center: Search By Address. https://msc.fema.gov/portal/search?AddressQuery=13055%20temple%20avenue#searchresultsanchor.

Governor's Office of Planning and Research (OPR). 2008, June. CEQA and Climate Change: Addressing Climate Change through CEQA Review. Technical Advisory. http://www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf.

Industry, City of. 2011. Water Purveyors Map. https://www.cityofindustry.org/home/showdocument?id=206.

———. 2014, June 12. 2014 General Plan. https://www.cityofindustry.org/home/showdocument?id=1693.

———. 2019. June 19. Zoning. https://www.cityofindustry.org/home/showdocument?id=6843.

Los Angeles, County of. 2012, June. Los Angeles County Emergency Response Plan. https://ceo.lacounty.gov/wp-content/uploads/2019/12/OAERP-Approved-Adopted-Version-6-19-2012.pdf.

Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

Office of Mine Reclamation (OMR). Mines Online. Accessed April 2, 2020. http://maps.conservation.ca.gov/mol/.

San Gabriel Valley Water Company (SGCWC). 2017, December. 2015 Urban Water Management Plan. https://www.sgvwater.com/wp-content/uploads/2018/09/Volume-I-FINAL-AMENDED_2015-UWMP_SGVWC_LACD.pdf.

———. 2020. Water Sources. https://www.sgvwater.com/water-quality-supply/water-sources/.

Sanitation Districts of Los Angeles County (LACSD). 2019. 2018 Pretreatment Program Annual Report. https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=16513.

———. 2019. Loadings for Each Class of Land Use. https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531.

South Coast Air Quality Management District (South Coast AQMD). 2008, July. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

———. 2010, September 28. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

4. References

———. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2.

Southern California Association of Governments (SCAG). 2020, May 7. Adopted Connect SoCal Plan: The 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy of The Southern California Association of Governments. https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx.

U.S. Department of the Interior, National Park Service (NPS). 2020. National Register of Historic Places. https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466.

US Environmental Protection Agency (USEPA). 2020. Health Effects Notebook for Hazardous Air Pollutants: Lead Compounds. https://www.epa.gov/sites/production/files/2016-09/documents/lead-compounds.pdf.

U.S. Fish and Wildlife Service (FWS). 2019. National Wetlands Inventory. Accessed April 3, 2020. https://www.fws.gov/wetlands/data/mapper.HTML.

U.S. Geological Survey (USGS). 2020. Areas of Land Subsidence in California. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html.

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