

August 2020 | Initial Study

**15246-15252 EAST VALLEY BOULEVARD GENERAL PLAN
AMENDMENT, ZONING CODE AMENDMENTS, AND USE PERMIT**
City of Industry

Prepared for:

City of Industry

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADT	average daily traffic
AQMP	air quality management plan
BMP	best management practices
COCAL FIRE	California Department of Forestry and Fire Protection
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
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂ e	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
LST	localized significance thresholds
mgd	million gallons per day
NAHC	Native American Heritage Commission

Abbreviations and Acronyms

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
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
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, Haddick's Towing Inc., is seeking approval from the City of Industry ("City") for a General Plan Amendment, Zone Change, Zoning Code Amendments, and Conditional Use Permit (CUP) on two adjoining parcels located at 15246- 15252 East Valley Boulevard (the proposed project). The 1.8-acre parcel at 15252 East Valley Boulevard currently consists of a legal non-conforming business for the storage of vehicles and trash containers, and the 1.84-acre parcel at 15246 East Valley Boulevard currently operates as a mobile home park, with 11 occupied housing units. The change in General Plan and Zoning designation will serve to make the two parcels compatible with the surrounding uses, as all surrounding properties are zoned Industrial and are designated Employment under the General Plan. In addition, implementation of the proposed project would allow for the applicant to relocate their existing tow yard operation to the 1.8-acre parcel currently being used for overnight truck and trash container storage. The mobile home park will continue to operate with no physical changes, and no portion of the mobile home park will be used for the tow yard facility.

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 includes two adjacent parcels (APN: 8208-023-057 and 8208-023-052) located at 15246- 15252 East Valley Boulevard in the City of Industry, Los Angeles County, California (See Figure 1, *Regional Location*). The project site is bounded by East Valley Boulevard to the north and adjacent industrial uses to the west, east and south. The project site's location in the City of Industry is surrounded by the City of Diamond Bar to the south and east, and unincorporated Rowland Heights to the southwest. Regional access to the project site is via State Route 60 (SR-60) and State Route 605 (SR-605), located approximately 1.3 miles to the south and 3 miles to the west, respectively (See Figure 2, *Local Vicinity* and Figure 3, *Aerial Photograph*).

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

The proposed project site includes two adjacent parcels totaling approximately 3.64 acres located at 15246 – 15252 East Valley Boulevard. The western parcel is located at 15246 East Valley Boulevard. This parcel is approximately 1.84 acres and occupied by a mobile home park developed with eleven homes, totaling 18,418 square-feet, with 13,627 square feet of landscaping. The mobile home park also includes 11 parking spaces for

1. Introduction

residents and 10 spaces for visitors. Access to the mobile home park is provided via driveway on Easy Valley Boulevard and motorized access gate.

The eastern parcel is located at 15252 East Valley Boulevard. The parcel is approximately 1.8 acres and is currently developed with 8,537 square feet of single-story buildings and covered vehicle storage areas, as shown in Table 1-1, *Existing Structures*. The parcel is currently occupied by a waste disposal company for storage of trash containers and automobile storage on the property. The parcel is fenced with 8-foot high chain link fencing completely covered with hedges that blocks the view into the property. There is an existing gallon above ground storage tank (AST) utilized for diesel fuel storage. The tank is located within an existing concrete containment area. The AST is not listed on any regulatory data base for corrective action. The front of the property has a lawn and a few trees, and there is a planting strip at the rear of the property. Access to the parcel is provided via driveway on East Valley Boulevard and access gate that automatically opens with a security code. The project site is relatively flat and paved with a combination of concrete areas and well packed gravel. The current uses at 15252 and 15246 East Valley Boulevard are both legal nonconforming uses.

Table 1-1 Existing Structures -

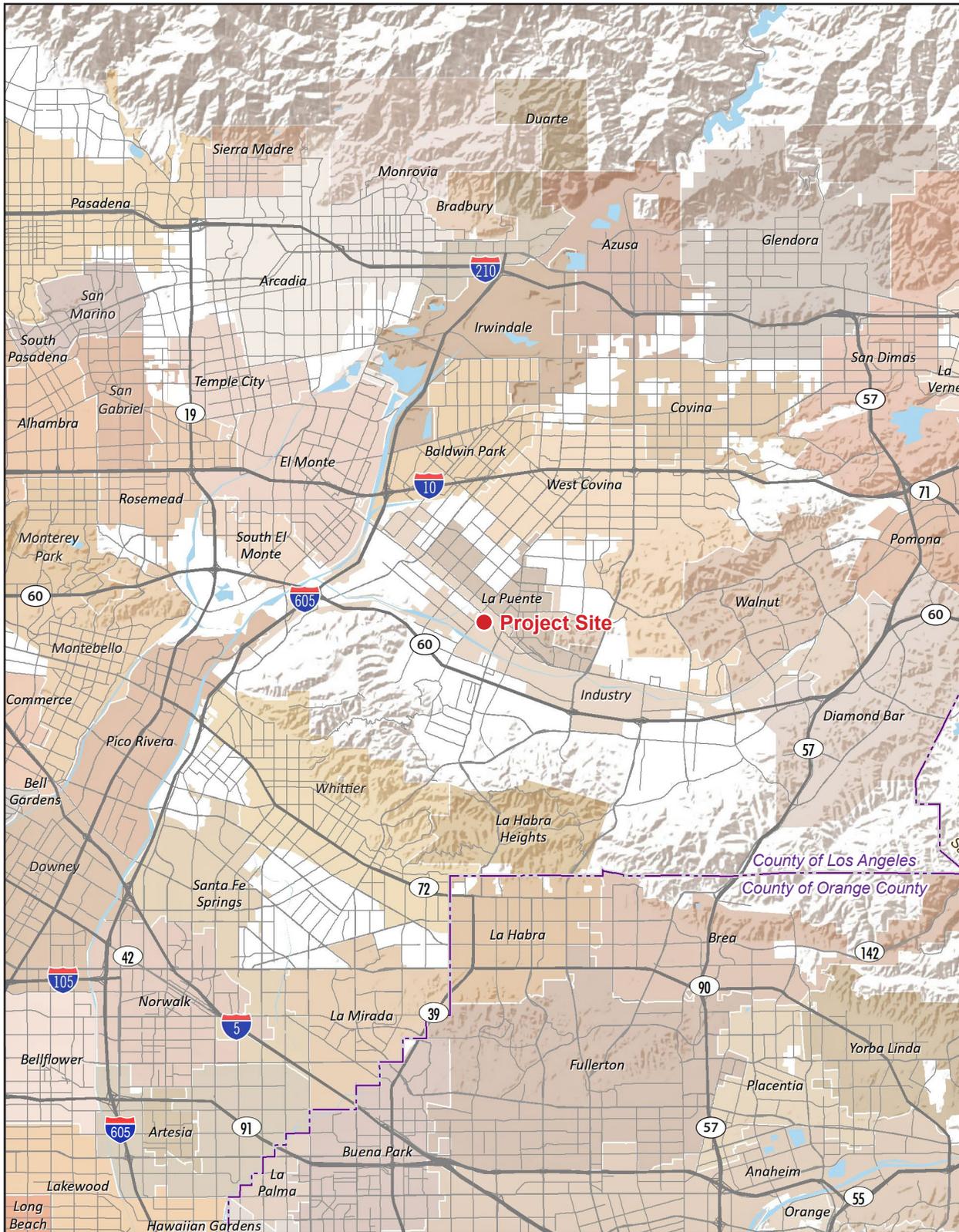
Type	Square Feet
Building A: Wood Framed Office Building	1084
Building B: Wood Framed Maintenance Building with an Open Covered Area	Building: 1675 Open Covered Area: 1560
Building C: Wood Framed Toilet Room Building	117
Building D: Open Covered Parking	2400
Building E: Storage	765
Metal Covered Wash Area with Concrete Pad	935
Total	8,537

1.2.2 Surrounding Land Use

The two parcels are entirely surrounded by properties with Industrial zoning and Employment General Plan land use designations. Industrial uses are found directly to the west, east, and south of the project site. To the north are industrial buildings across East Valley Boulevard and a slightly elevated railroad track further north. It should be noted that there are four vacant single-family homes located along Turnbull Canyon Road beyond the mobile homes and industrial uses to the west; however, as with the surrounding properties, these vacated homes are also zoned Industrial and are designated Employment under the General Plan.

Figure 1 - Regional Location

1. Introduction



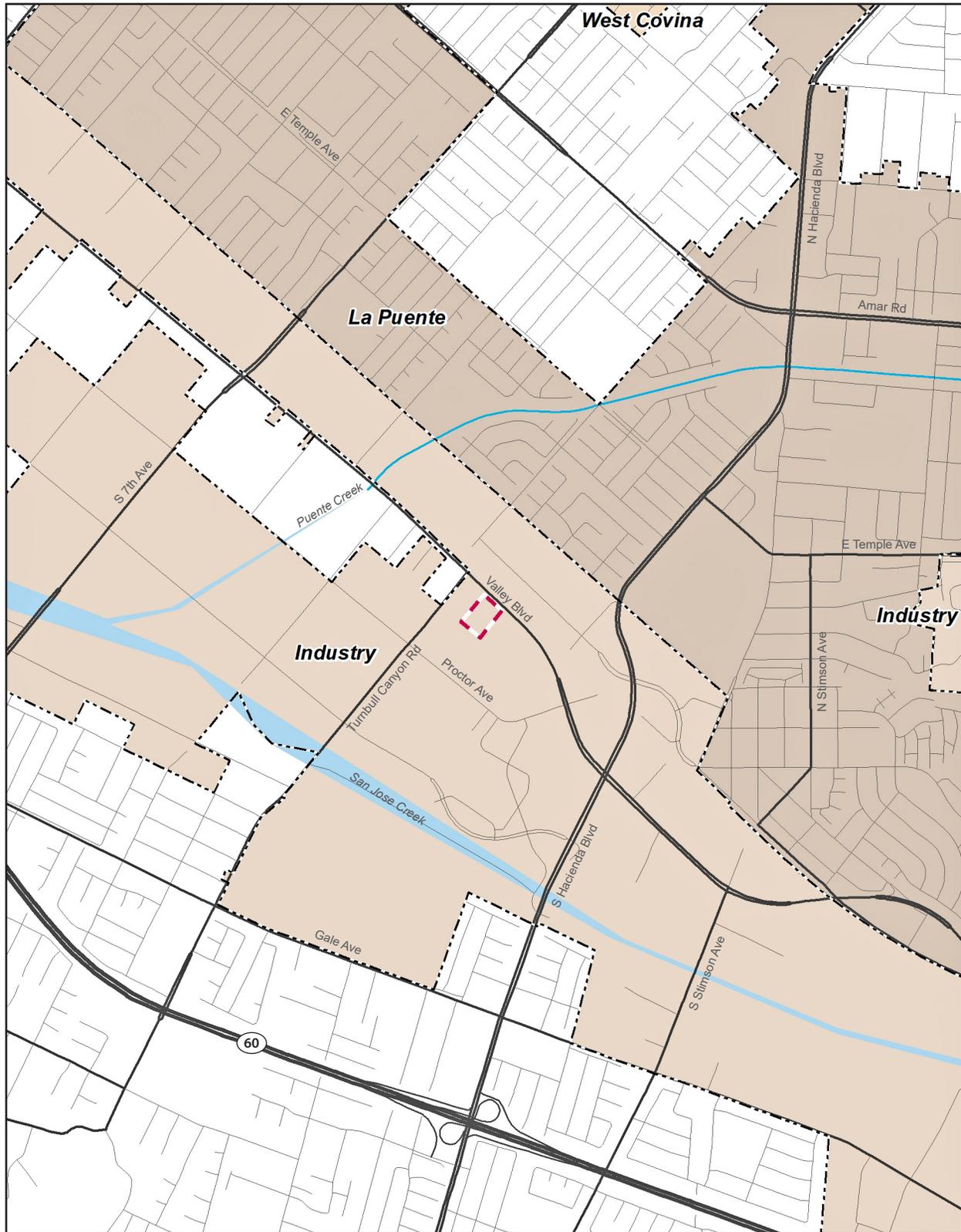
Note: Unincorporated county areas are shown in white.
Source: ESRI, 2020



1. Introduction

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Figure 2 - Local Vicinity
1. Introduction



--- Project Boundary

Note: Unincorporated county areas are shown in white.

Source: ESRI, 2020

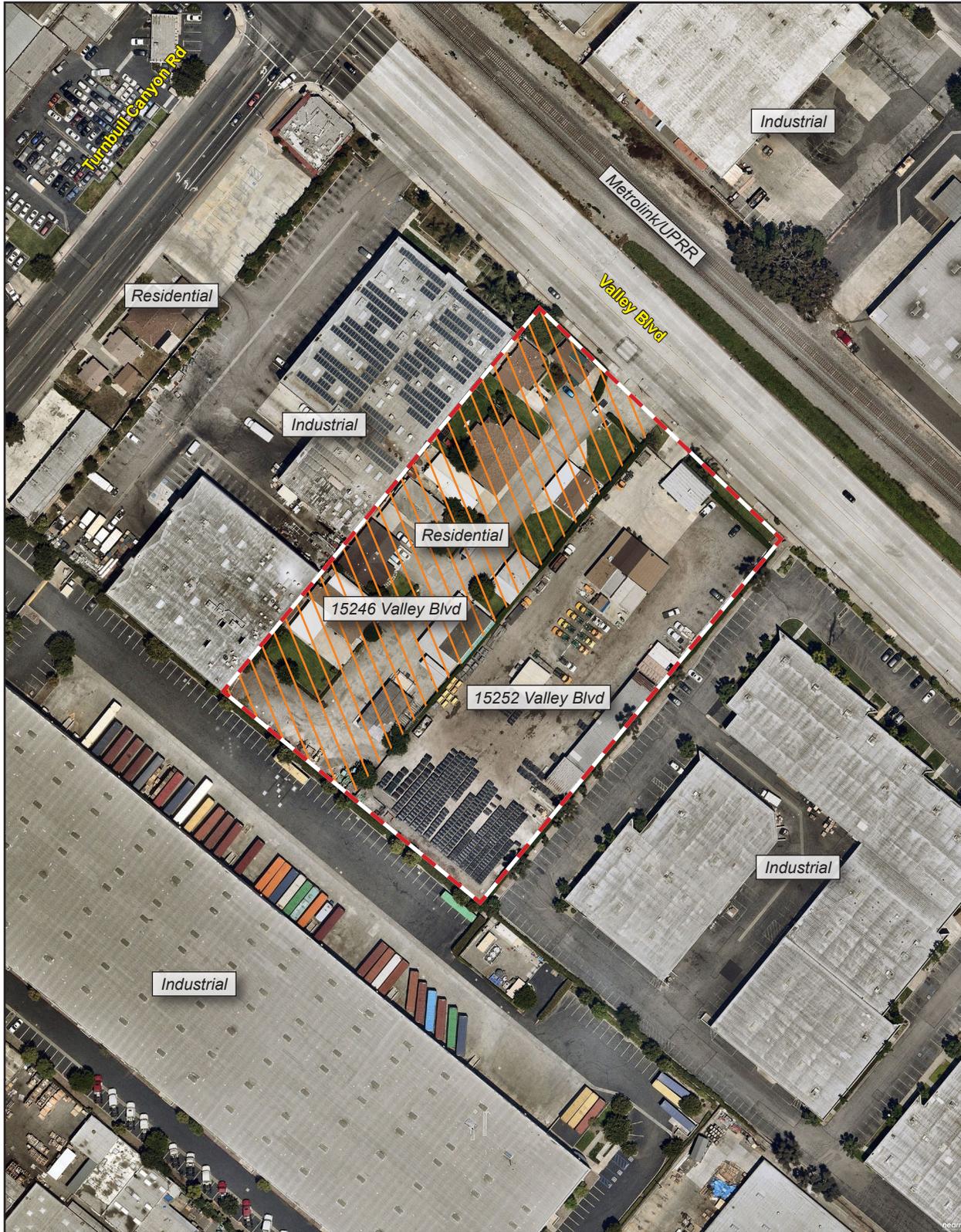
0 2,000
Scale (Feet)



1. Introduction

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Figure 3 - Aerial Photograph
1. Introduction



- Project Boundary
- /// No Physical Change

0 150
Scale (Feet)



Source: Nearmap, 2020

1. Introduction

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1. Introduction

1.3 PROJECT DESCRIPTION

“Project,” as defined by the CEQA Guidelines, means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700” (14 Cal. Code of Reg. § 15378[a]).

Following is a detailed description of the proposed project’s overall site plan and improvements to the auto towing yard. Implementation of the proposed project requires approval of the General Plan Amendment, Zone Change, Zoning Code Amendments, and Conditional Use Permit by the City of Industry.

1.3.1 Proposed General Plan Amendment and Zone Change

The project site is zoned and has a General Plan designation of Commercial (Industry 2019; 2014). Surrounding land uses are all zoned Industrial and have a General Plan designation of Employment. In order to be compatible with surrounding uses, the proposed project will seek approval from the City of the following:

- General Plan Amendment to change the land use designation from Commercial to Employment
- Zone Change from Commercial (C) to Industrial (M)
- Zoning Code Amendment to amend the City’s Zoning Map to change the zoning designation of the properties located at 15246 and 15252 East Valley Boulevard from Commercial to Industrial
- Zoning Code Amendment to remove an automobile and truck towing yard as a permitted use and add an automobile and truck towing yard as a conditionally permitted use in the Industrial (M) zone, subject to (a) any portion of the property used for storage or impound to be screened from public view; (b) minimum lot size of one acre; and (c) yard shall be improved with asphalt, concrete, or other paved surface.
- Conditional Use Permit for the use of an automobile towing yard and vehicle storage at the 1.8-acre site

Specifically, the applicant is requesting approval of a general plan amendment (GPA No. 20-1) and zone change amendment (ZC No. 20-1) of two existing properties identified as 15246 Valley Boulevard and 15252 Valley Boulevard, that are currently zoned “C” – Commercial with a general plan land use designation of Commercial to “M” – Industrial, with a general plan land use designation of Employment; a zoning code text amendment so that ‘automobile truck towing yard’ will be a permitted use with approval of a Conditional Use Permit (“CUP”) in the “M” – Industrial zone; and a CUP (CUP No. 20-2) for the operation of an automobile truck towing yard at the project site. The Zoning Code amendment would result in amending Sections 17.16.025 (Permitted uses) and 17.16.010 (Uses permitted with a CUP) under Chapter 17.16 (Industrial Zone) of the City’s Municipal Code. Currently, under Section 17.16.010.D of the City’s Code, an ‘automobile and truck towing yard’ is permitted by right under, provided that the yard is constructed of reinforced structural concrete and is enclosed with a minimum eight-foot-high obscuring material. The proposed amended code language is as follows:

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Code Section	Proposed Amendment
Chapter 17.16 – Industrial	17.16.010.D Automobile and truck towing yard provided that the yard is constructed of reinforced structural concrete and is enclosed with a minimum of an eight foot high masonry screen wall.
Chapter 17.16 – Industrial: Section 17.16.025	<u>13. Automobile and truck towing yard provided that the yard is completely paved with asphalt or city approved equivalent and is completely screened from public view with minimum eight foot high obscuring material on a property with minimum lot size of 1.5 acres.</u>

The Zoning Code amendments will also change the designation of the properties on the City’s land use map from Commercial to Industrial.

The applicant is requesting that automobile truck tow yards be a permitted use with approval of a CUP under Section 17.16.025. These actions will make the zoning and general plan designations consistent with the surrounding properties and will allow for ‘automobile truck towing yards’ as a Citywide permitted use in the “M” – Industrial zone with approval of a CUP. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Even with the proposed General Plan and Zoning Code amendments, the housing will be able to remain as a legal non-conforming use under Section 17.40.070 of the City Code and is consistent with the City’s Housing Element (2013-2021) Goal 2, Policy 2.4: by encouraging the preservation of existing housing units within the City of Industry.

Figure 4, *Proposed General Plan Amendment and Zone Change*, illustrates the area that would undergo the General Plan Amendment and Zone Change. Only the eastern parcel at 15252 East Valley Boulevard would undergo physical modifications as a result of the proposed project. There would be no physical change to the existing mobile home park under the proposed project.

1.3.2 Improvements to 15252 East Valley Boulevard – Proposed Auto Tow Yard

The applicant, Haddick’s Towing and Transport currently operates at 15210 East Valley Boulevard in the City, approximately 0.2 miles west of the project site. Currently, Haddick’s has 28 full time employees, with 14 tow trucks operating 24-hours a day, seven days a week. Diesel powered yard equipment includes one fork-lift. Based on the applicant’s data, the tow yard averages approximately 40 trips per day. Implementation of the proposed project would not result in a change to the day to day operations of Haddick’s Tow Yard.

The improvements that would occur at the proposed tow yard site includes the demolition of the existing 837 square feet concrete slab and replacement of the existing approximately 57,205 square feet of gravel paving with 4-inch asphalt paving. The existing metal covered wash area with concrete pad, concrete containment area for the diesel fuel tank, and 6-inch concrete paving next to the Buildings A and C will remain, and no changes to the existing structures will occur. A new 1,000-gallon clarifier would be installed in the vehicle wash area to separate the wastewater. The clarifier would connect to an existing sewer line. The proposed project also includes approximately 5,636 square feet of landscaping with approximately 9,9194 square feet of hedges along the property lines and chain link fencing surrounding the project site, similar to existing conditions. The existing chain link fence between the mobile home park and auto towing yard will be replaced with an 8-foot high fence to block views into the property. Figure 5, *Proposed Improvements to the Auto Towing Yard*, illustrates the proposed

1. Introduction

physical improvements on the project site. Given that there are no modifications to any existing building or structure on the site, pursuant to Section 17.36.100 of the City’s Municipal Code (“Code”), a development plan is not required for the proposed project.

Access to the proposed tow yard would continue to be provided by the existing driveway connection via East Valley Boulevard with a motorized sliding access gate. As shown in the Table 1-2, *Proposed Parking*, a total of 28 spaces are provided, which also includes two designated clean air parking spaces. The proposed project also includes 59 spaces for automobile storage and five spaces for tow truck parking. Existing sewer, storm drain, and water lines will connect to the existing infrastructures along East Valley Boulevard.

Table 1-2 Proposed Parking

Type	Number of Spaces
Visitor	6
Employee	11
Van Accessible	1
Covered Parking	10
Total	28

1.3.3 Project Operation

The applicant, Haddick’s Towing and Transport currently operates at 15210 East Valley Boulevard in the City, approximately 0.2 miles west of the project site. Implementation of the proposed project would not result in a change to the day to day operations of Haddick’s Tow Yard. The improved site will be used for automobile towing yard and vehicle storage at the exterior storage yard. The tow yard would include approximately 28 full-time employees and 14 tow trucks, averaging approximately 40 truck trips daily. One diesel powered forklift would be utilized on-site, similar to the existing site. The proposed automobile towing yard and vehicle storage will operate 24 hours a day, seven days a week.

As set forth above, no changes will be made to the mobile home park, and no portion of the park will be used for operation of the tow yard facility.

1.3.4 Project Construction

Construction activities are anticipated to begin in November 2020. The construction would be completed in one phase, lasting approximately one month, and includes the following activities: demolition of existing concrete slab, grading and excavation, replacement of existing paving, and internal driveway and parking improvements. Grading activities would result in the disturbance of approximately 1.08 acres of area and would result in a balanced site (cut and fill) with no importing or exporting of soils.

As set forth above, no changes will be made to the mobile home park, and no portion of the park will be used for operation of the tow yard facility.

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1.4 OTHER AGENCY ACTION REQUESTED

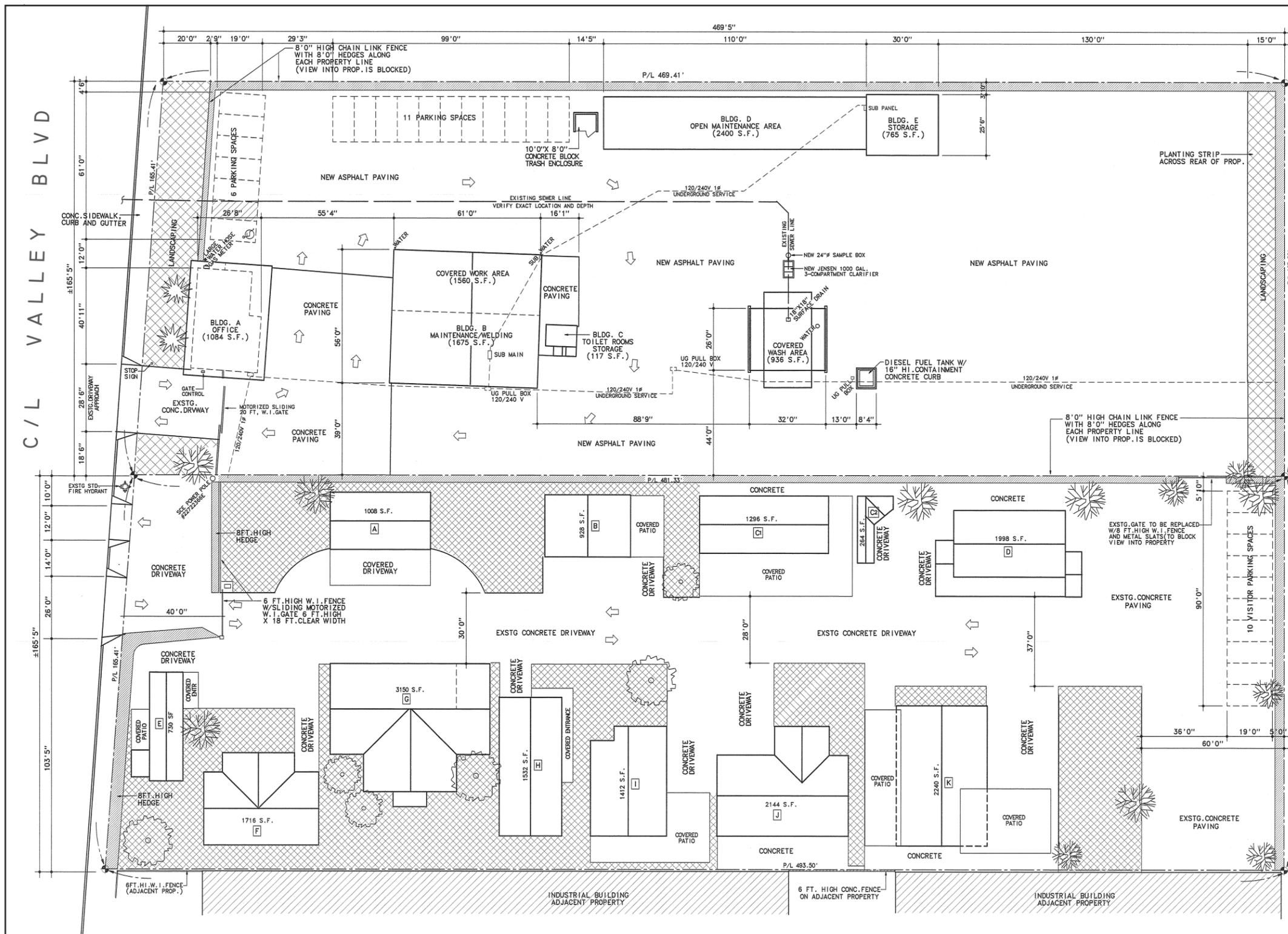
REGIONAL AGENCIES

- 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 General Plan Amendment and Zone Change
1. Introduction



PROJECT LEGEND

15252 VALLEY BLVD. (AIN#8208-023-052)

TOTAL SITE AREA: 78,458 SQ.FT.
TOTAL ACREAGE: 1.80 ACRES

EXISTING BUILDING AREA: 8,537 SQ.FT.
PROPOSED BUILDING AREA: NONE
TOTAL BUILDING AREA: 8,537 SQ.FT.

REQUIRED BUILDING/LOT RATIO: 50%
EXISTING BUILDING/LOT RATIO: 11%

LANDSCAPE DATA:

TOTAL LANDSCAPE AREA: 5,636 SQ.FT.
APPROX. LANDSCAPING AT FENCE: 9,194 SQ.FT.
EXISTING LANDSCAPE RATIO: 18%
REQUIRED LANDSCAPE RATIO: 12%

PARKING DATA

TOTAL PARKING REQUIRED: 17 SPACES
TOTAL PARKING PROVIDED: 17 SPACES

15246 VALLEY BLVD. (AIN#8208-023-057)

TOTAL SITE AREA: 80,150 SQ.FT.
TOTAL ACREAGE: 1.84 ACRES

EXISTING BUILDING AREA: A 1,008 S.F.
B 928 S.F.
(EXISTING MOBIL HOMES) C1-2 1,560 S.F.
D 1,998 S.F.
E 730 S.F.
F 1,716 S.F.
G 3,150 S.F.
H 1,532 S.F.
I 1,412 S.F.
J 2,144 S.F.
K 2,240 S.F.

TOTAL EXISTING BLDG. AREA: 18,418 SQ.FT.
PROPOSED BUILDING AREA: NONE
TOTAL BUILDING AREA: 18,418 SQ.FT.

REQUIRED BUILDING/LOT RATIO: 50%
EXISTING BUILDING/LOT RATIO: 23%

LANDSCAPE DATA:

TOTAL LANDSCAPE AREA: 13,627 SQ.FT.
APPROX. LANDSCAPING AT FENCE: 1,406 SQ.FT.
EXISTING LANDSCAPE RATIO: 19%
REQUIRED LANDSCAPE RATIO: 12%

PARKING DATA

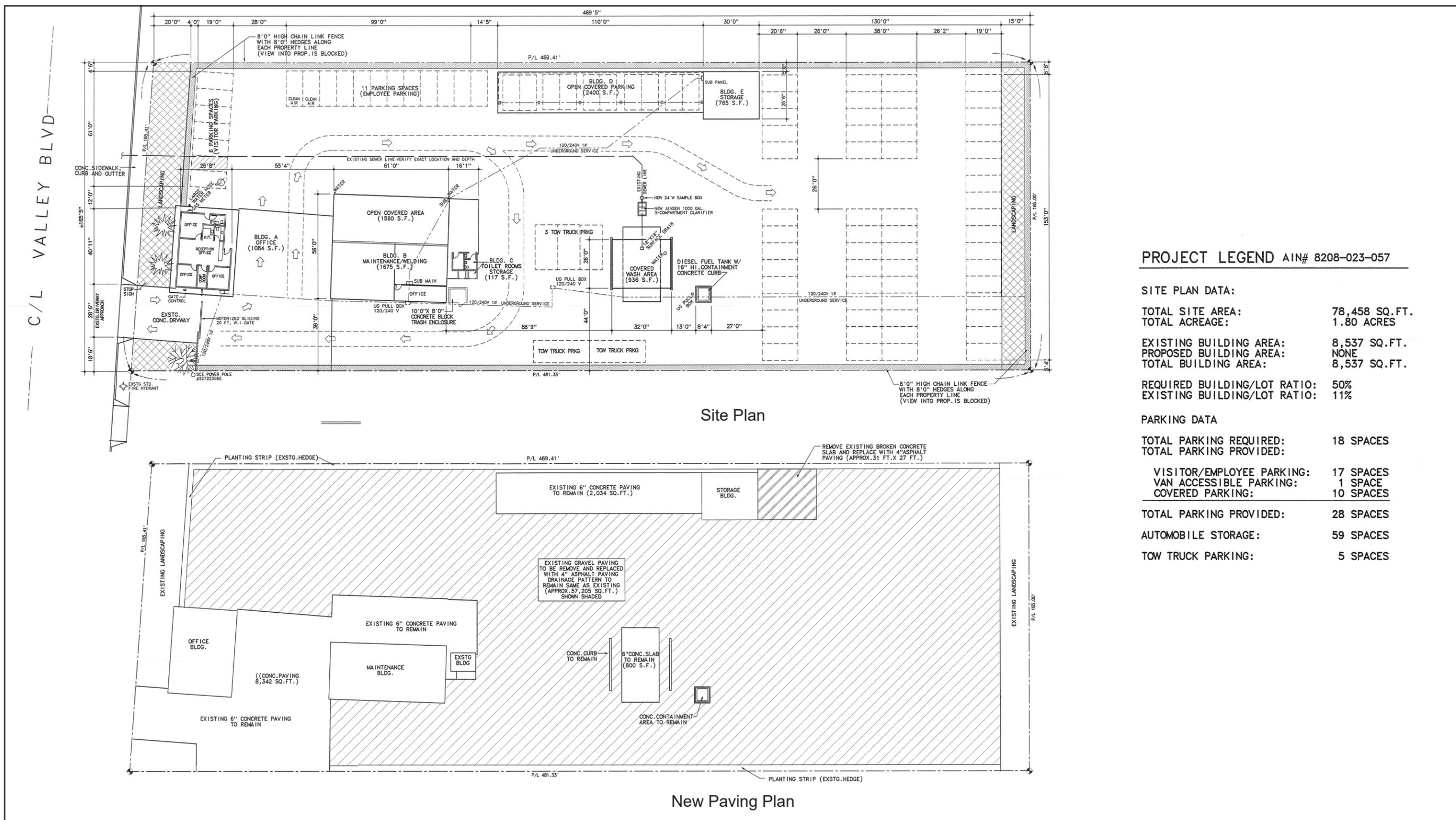
PARKING AT RESIDENCE: 11 SPACES
(MIN. ONE SPACE/RESIDENCE)
VISITOR PARKING: 10 SPACES



1. Introduction

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Figure 5 - Proposed Improvements to the Auto Towing Yard
1. Introduction



PROJECT LEGEND AIN# 8208-023-057

SITE PLAN DATA:

TOTAL SITE AREA:	78,458 SQ.FT.
TOTAL ACREAGE:	1.80 ACRES
EXISTING BUILDING AREA:	8,537 SQ.FT.
PROPOSED BUILDING AREA:	NONE
TOTAL BUILDING AREA:	8,537 SQ.FT.
REQUIRED BUILDING/LOT RATIO:	50%
EXISTING BUILDING/LOT RATIO:	11%

PARKING DATA

TOTAL PARKING REQUIRED:	18 SPACES
TOTAL PARKING PROVIDED:	
VISITOR/EMPLOYEE PARKING:	17 SPACES
VAN ACCESSIBLE PARKING:	1 SPACE
COVERED PARKING:	10 SPACES
TOTAL PARKING PROVIDED:	28 SPACES
AUTOMOBILE STORAGE:	59 SPACES
TOW TRUCK PARKING:	5 SPACES



1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** General Plan Amendment GPA No. 20-1, Zone Change No. ZC No. 20-1, Zoning Code Text Amendment ZA No. 20-1, for the properties at 15246-15252 East Valley Boulevard and Conditional Use Permit CUP No. 20-02 for the proposed operation of an automobile and truck towing yard at 15252 East Valley Boulevard

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 includes two adjacent parcels (APN: 8208-023-057 and 8208-023-052) located at 15246-15252 East Valley Boulevard in the City of Industry, Los Angeles County, California. The project site is bounded by East Valley Boulevard to the north and adjacent industrial uses to the west, east and south. The project site's location in the City of Industry is surrounded by the City of Diamond Bar to the south and east, and unincorporated Rowland Heights to the southwest. Regional access to the project site is via State Route 60 (SR-60) and State Route 605 (SR-605), located approximately 1.3 miles to the south and 3 miles to the west, respectively

5. **Project Sponsor's Name and Address:**
Haddick's Towing Inc
P.O. Box 3327
City of Industry, CA 91744

6. **General Plan Designation:** Commercial

7. **Zoning:** Commercial

8. **Description of Project:**
The project site is zoned and has a General Plan designation of Commercial (Industry 2019; 2014). Surrounding land uses are all zoned Industrial and have a General Plan designation of Employment. In order to be achieve consistency with surrounding uses, the Applicant is seeking approval of the following:

- General Plan Amendment to change the land use designation from Commercial to Employment
- Zone Change from Commercial (C) to Industrial (M)

2. Environmental Checklist

- Zoning Code Amendment to amend the City's Zoning Map to change the zoning designation of the properties located at 15246 and 15252 East Valley Boulevard from Commercial to Industrial
- Zoning Code Amendment to remove an automobile and truck towing yard as a permitted use and add an automobile and truck towing yard as a conditionally permitted use in the Industrial (M) zone, subject to (a) any portion of the property used for storage or impound to be screened from public view; (b) minimum lot size of one acre; and (c) yard shall be improved with asphalt, concrete, or other paved surface.
- Conditional Use Permit for the use of an automobile towing yard and vehicle storage at the 1.8-acre site (15252 East Valley Boulevard)

Currently, both properties are designated as Commercial, under both the City's General Plan and Zoning Code. However, the surrounding properties designated as Industrial. In order to create consistent and uniform zoning in the area, it is necessary to change the zoning and general plan designation of the properties from Commercial to Industrial.

The applicant is requesting that automobile truck tow yards be a permitted use with approval of a CUP under Section 17.16.025. These actions will make the zoning and general plan designations consistent with the surrounding properties and will allow for 'automobile truck towing yards' as a Citywide permitted use in the "M" – Industrial zone with approval of a CUP. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. The housing will be able to remain as a legal non-conforming use under Section 17.40.070 of the City's Code, and is consistent with the City's Housing Element (2013-2021) Goal 2, Policy 2.4: by encouraging the preservation of existing housing units within the City of Industry.

Only the eastern parcel at 15252 East Valley Boulevard would undergo physical modifications as a result of the proposed project. There would be no physical change to the existing mobile home park under the proposed project, and no portion of the mobile home park would be used for the tow yard. The improvements that would occur at the proposed tow yard site include the demolition of the existing 837 square feet concrete slab and replacement of the existing approximately 57,205 square feet gravel paving with 4-inch asphalt paving. The existing metal covered wash area with concrete pad, concrete containment area for the diesel fuel tank, and 6-inch concrete paving next to the Buildings A and C will remain, and no changes to the existing structures will occur. A new 1,000-gallon clarifier would be installed in the vehicle wash area to separate the wastewater. The clarifier would connect to an existing sewer line.

-
- 9. Surrounding Land Uses and Setting:** The two parcels are entirely surrounded by properties with Industrial zoning and Employment General Plan land use designation. Industrial uses are found directly to the west, east, and south of the project site. To the north are industrial buildings across East Valley Boulevard and a slightly elevated railroad track further north. It should be noted that there are four vacant single-family homes located along Turnbull Canyon Road beyond the mobile homes and industrial uses to the west; however, as with the surrounding properties, these vacated homes are also zoned Industrial and are designated Employment under the General Plan.

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)

2. Environmental Checklist

- 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 of Industry's notification list pursuant to AB 52. The City prepared notification letters and distributed them to the identified tribal representatives on August 13, 2020. No reply has been received for either tribe as of the publication date of this MND.

2. Environmental Checklist

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.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture / Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> 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. Environmental Checklist

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) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. 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.

2. Environmental Checklist

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.

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 San Gabriel Mountains are located approximately 10.5 miles to the north of the proposed project site; however, scenic views of the mountains are limited and largely obstructed by surrounding development. The Puente Hills are located approximately 2.6 miles south of the project site, are moderately visible in the background from much of the City; however distinct views of the mountains are interrupted due to intervening industrial development, transportation and power infrastructure located in the immediate foreground of the project site.

Proposed General Plan Amendment and Zoning Code Amendments

Implementation of the proposed General Plan Amendment and Zoning Code Amendments would not impact views of these mountains. Implementation of amendments would allow for the project site to be compatible

3. Environmental Analysis

with the industrial nature of the surrounding land uses. Any future development that occurs will be evaluated by City staff, and if scenic resources are present on parcels with proposed projects or activities which may have significant environmental impacts, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility.

15252 East Valley Boulevard – Proposed Auto Tow Yard

Project development would not introduce new structures that would obstruct views either on or off site. Therefore, the proposed project 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 its 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 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. Additionally, 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 City is entirely developed with commercial, industrial, commercial recreation and limited residential uses, 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 City is not visible from the nearest state-designated scenic highway (Angeles Crest Highway), which is approximately 19 miles to the northwest (Caltrans 2020). Implementation of the proposed General Plan Amendment and Zoning Code Amendments and development of the minor improvements for the relocated tow yard would not impact scenic resources. Therefore, no impact to scenic resources would occur due to project implementation 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

3. Environmental Analysis

accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The City is in an area that qualifies as an “urbanized area” and is surrounded by industrial uses.¹ Implementation of the proposed General Plan Amendment and Zoning Code Amendments would allow for the development of automobile tow yards within land uses designated “M” with approval of a CUP, which would ensure that future projects comply with the provisions of the City’s Zoning Code to minimize potential visual impacts. Development of future tow yards that would result due to implementation of the proposed project would also occur in areas of the City designated for industrial land uses. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City.

Physical improvements that would occur at 15252 East Valley Boulevard would only involve improvements such as repaving on the auto towing yard . There would be no physical changes to the existing buildings at the storage yard or mobile home park. The proposed project would approve a General Plan Amendment, Zone Change, Zoning Code Amendments, and Conditional Use Permit that would allow for the relocation of existing tow yard uses to a new location within the City, while allowing the mobile home park to remain in place. Through the City’s development review process—which includes the City’s Planning Commission and City Council’s review and consideration of the project—the City would ensure that approval of the proposed project would not conflict with applicable zoning or regulations governing scenic quality. The proposed General Plan and Zone Ordinance Amendments would provide for uniformity of land uses in the area. Upon approval, the tow yard would be consistent with the zoning of the project site, and with the surrounding area. Therefore, impact would be less than significant and no mitigation measures are necessary.

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.

Proposed General Plan Amendment and Zoning Code Amendments

Implementation of the proposed General Plan Amendment and Zoning Code Amendments would allow for the development of automobile tow yards within land uses designated M with approval of a CUP. Future applications for tow yards that would occur under the amended zoning code would be required to undergo staff review. Such application would occur on lands that are designated for Employment and zoned Industrial, thereby minimizing the potential impacts of new lighting. Additionally, the code amendment requires that new tow facilities provide screening to shield the service yard from views from the outside. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP

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>

3. Environmental Analysis

requirement for the future development of tow yards in the City. City Staff would review all projects for potential lighting impacts. This would ensure that impacts from the General Plan Amendment and Zoning Code Amendments are less than significant.

15252 East Valley Boulevard – Proposed Auto Tow Yard

The parcel at 15252 East Valley Boulevard 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). The mobile home park is considered a light-sensitive receptor; however, development of the tow yard would not introduce new sources of artificial light to the project site and surrounding area as no changes to the existing lighting on the project site would occur. The amount and intensity of nighttime lighting proposed onsite would not be substantially greater or different than existing lighting. Therefore, no impact would occur 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

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

3. Environmental Analysis

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 entire City, including the parcels located at 15246-15252 East Valley Boulevard is developed land and currently utilized for storage of vehicles and trash containers and mobile home park 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 City and the project site are not subject to a Williamson Act contract, and the site is zoned as Commercial in the City's Zoning Map (Industry 2019). 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.

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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 unhealthy 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 (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), 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 O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2018).

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, PM₁₀, and PM_{2.5}. 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. Therefore, projects with emissions below these thresholds would not result in significant health impacts.

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. South Coast AQMD adopted the 2016 Air Quality Management Plan on March 3, 2017. Regional growth projections are used by 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.

General Plan Amendment and Zoning Code Amendments

Section 15206(b) of the CEQA Guidelines states that a proposed project is of statewide, regional, or area-wide significance if it is 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 General Plan Amendment and Zoning Code Amendments would bring consistent and uniform zoning to the project area, as all surrounding property is currently zoned Industrial and designated Employment, under the General Plan, and also allows for the development of automobile tow yards within land uses designated “M”, with approval of a CUP. Further, development of future tow yards within lands designated Employment and zoned Industrial would be consistent with the City’s General Plan land use projections identified in the AQMP, as tow yards are already an allowable use within the Industrial Zone. The proposed project would require a CUP for any future tow yard development, providing the City with the ability to review all such projects for compatibility.

15252 East Valley Boulevard – Proposed Auto Tow Yard

Implementation of the proposed project would also result in the relocation of the Applicant’s existing tow yard from 15120 Valley Boulevard to the parcel at 15252 East Valley Boulevard. . As a result, the proposed project would not result in an increase in employees or population within the City. 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. The project would not have the potential to substantially affect SCAG’s demographic projections. Additionally, as demonstrated below in Section 3.3(b), the proposed project would not result in a net increase in regional emissions; and therefore, would not be considered a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. 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.

3. Environmental Analysis

Proposed General Plan Amendment and Zoning Code Amendments

In as much as the proposed General Plan Amendment and Zoning Code Amendment could indirectly result in new development, the Zoning Code Amendment could result in air pollutant generation from construction activities, increased vehicle use, natural gas combustion, and other operational sources associated with construction and operation of new tow yards in the City. Such emissions could incrementally contribute to the basin’s non-attainment conditions. Construction emissions would be reduced through implementation of existing regulatory requirements, such as SCAQMD Rule 403 for fugitive dust control, and Rule 1113 for architectural coatings. Additionally, typical tow yard operations involve minimal building development, and limited operational emissions, as they are limited to operation of the tow fleet, which are typically medium duty vehicles. As such, compliance with all South Coast AQMD regulations during construction and operation of as well as the City’s CUP approval process, which would include future CEQA review, impacts from development of new tow yards in the City would be reduced to less than significant. Further, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City

15252 East Valley Boulevard – Proposed Auto Tow Yard

Regional Short-Term Construction Impacts

Relocation of the applicant’s existing tow yard to the parcel at 15252 East Valley Boulevard would result in gravel and concrete demolition followed by asphalt paving that would take approximately less than 2 months to complete. Construction of the proposed project would generate criteria air pollutants from equipment exhaust and fugitive dust associated with gravel/concrete demolition and asphalt paving. 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). 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, 2020	Criteria Air Pollutant Emissions (lbs/day) ^{1,2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	2	21	15	<1	1	1
Site Preparation	2	19	8	<1	3	2
Grading	1	16	7	<1	3	2
Paving	1	8	9	<1	1	0
Architectural Coating	1	2	2	<1	0	0
Overlapping Paving & Architectural Coating	2	10	11	<1	1	1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	4	45	30	<1	3	2
South Coast AQMD Regional Significance Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

3. Environmental Analysis

Table 3-1 Maximum Daily Regional Construction Emissions

Construction Phase, 2020	Criteria Air Pollutant Emissions (lbs/day) ^{1,2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Source: CalEEMod Version 2016.3.2.25 Notes: Totals may not total to 100 percent due to rounding. ¹ Construction phasing and equipment is based on the preliminary information for the project provided by the Applicant. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment and phasing for comparable projects. ² Includes implementation of fugitive dust control measures under South Coast AQMD 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). Approval of the CUP would result in the relocation of an existing and operational towing yard from 15120 Valley Boulevard to 15252 East Valley Boulevard. The tow yard has 28 full time employs, with 14 tow trucks operating 24-hours a day, seven days a week. Based on the applicant’s data, the tow yard averages approximately 40 trips per day. Diesel powered yard equipment includes one fork-lift. The proposed project would not result in an increase in regional operational phase emissions in the SoCAB as emissions associated with the tow yard are being relocated to the project site. No regional net increase in emissions would occur. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Proposed General Plan Amendment and Zoning Code Amendments

Implementation of the proposed General Plan Amendment and Zoning Code Amendments would bring consistent and uniform zoning to the project area, as all surrounding property is currently zoned Industrial and designated Employment, under the General Plan, and allow for the development of tow yards at property with the designation of Employment, and zoning of Industrial, with approval of a CUP. Typical tow yard operations are not considered to be hazardous emitters by the South Coast AQMD. Any application for a new tow yard would be reviewed by the City for compatibility of surrounding land uses, including exposure of sensitive uses to substantial pollutant concentrations. As identified in the California Air Resources Board’s (CARB) 2005 *Air Quality and Land Use Handbook: A Community Health Perspective*, facilities with over 100 truck trips per day have the potential to generate substantial concentrations of diesel particulate matter (DPM) at sensitive receptors. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on sensitive receptors, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility. However, tow yard operation that would exceed 100 truck trips per day could potentially expose sensitive receptors, and impacts would be

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potentially significant. In order to ensure that future tow yard operations do not adversely impact sensitive receptors, the mitigation measure ZCA-AQ1 has been identified:

Mitigation Measure

ZCA-AQ1 Prior to future discretionary approval of a new tow yard, the City of Industry Planning Department shall evaluate new development proposals for proximity to sensitive land uses (e.g., residences, schools, and day care centers) within 1,000 feet of the proposed new tow yard for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) if it is anticipated that the tow yard would result in more than 100 trips per day:

If the future tow yard should meet the criteria of being within 1,000 feet of sensitive receptors and result in more than 100 tow truck trips per day, the applicant shall submit a health risk assessment (HRA) to the City of Industry. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast Air Quality Management District (SCAQMD). The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective thresholds, as established by the SCAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below the aforementioned thresholds as established by the SCAQMD), including appropriate enforcement mechanisms. Measures may include but are not limited to:

- Utilizing electric yard equipment
- Restricting idling
- Utilizing tow vehicles with internal combustion engines equipment that meet EPA-certified Tier 3 emissions standards
- Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project.

Timing/Implementation: During project review of future tow yards located within 1,000 feet of sensitive receptors and operating with more than 100 daily tow truck trips

Monitoring/Enforcement: City of Industry

3. Environmental Analysis

15252 East Valley Boulevard – Proposed Auto Tow Yard

Construction

Localized Construction Impacts

Development of the relocated tow yard at 15252 East Valley Boulevard 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 $\mu\text{g}/\text{m}^3$) 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 $\mu\text{g}/\text{m}^3$) could exceed the California AAQs 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.

As previously stated, construction of the proposed tow yard site would be minimal, consisting of demolition of concrete ground cover and asphaltting the site. Construction activities would last approximately 2 months. Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 3-2, *Maximum Daily Onsite Localized Construction Emissions*, shows the maximum daily construction emissions (pounds per day) generated during onsite construction activities compared with the South Coast AQMD’s screening-level LSTs, shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities at the project site compared with the South Coast AQMD’s screening-level LSTs. 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 3-2 Maximum Daily Onsite Localized Construction Emissions

Construction Activity, 2020	Pollutants (lbs/day) ¹			
	NO _x	CO	PM ₁₀ ²	PM _{2.5} ²
South Coast AQMD 1.00 -acre LSTs	96	798	5.7	4.35
Demolition	21	15	2	1
Site Preparation	18	8	3	2
Grading	15	6	3	2
Exceeds Screening-Level LST?	No	No	No	No
South Coast AQMD 1.00 -acre LSTs	83	673	5	4
Paving	8	9	<1	<1
Architectural Coating	2	2	<1	<1
Overlapping Paving and Architectural Coating	10	11	1	1
Exceeds Screening-Level LST?	No	No	No	No

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Table 3-2 Maximum Daily Onsite Localized Construction Emissions

Source: CalEEMod Version 2016.3.2., and South Coast AQMD 2008 and 2011. Based on sensitive receptors within 25 meters (82 feet) within Source Receptor Area (SRA) 11.

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.

- 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.
-

Health Risk

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 OEHHA adopted new guidance for the preparation of health risk assessments in March 2015 (OEHHA 2015). OEHHA has 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. 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 is anticipated to be developed in less than two 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. The proposed project would require use of 14 tow trucks and a diesel-powered forklift at the project site. The project site also includes an existing diesel fueling station that would be utilized by the applicant's tow truck. 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; however, these sources are nominal. The tow yard would have a maximum of 40 trips per day from the tow yard trucks and would be substantially under CARB's identified truck trip number. Use of the forklift would; likewise, not result in substantial emissions onsite. Thus, operational criteria air pollutant emissions from the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.

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

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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). The proposed project would result in the relocation of an existing and operational towing yard from 15120 Valley Boulevard to 15252 East Valley Boulevard, which is 0.2-mile from the project site. 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. Implementation of the proposed General Plan and Zoning Code Amendments and the relocated towing yard do not fall within the aforementioned land uses; no operational odors are anticipated.

During gravel and concrete demolition and paving 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 demolition and paving 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.

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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 entire City, including the relocated tow yard site is highly industrialized (see Figure 3, *Aerial Photograph*), 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 (CNDDDB). 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.

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The CNDDDB 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 uses in the City and those located on the project site and its surroundings, and views of the project site and surrounding area from Google Earth maps, implementation of the General Plan and Zoning Code Amendments, and relocation of the tow yard 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 sites designated as Employment or the relocated tow yard site, and no natural biological resources or communities exist on, adjacent to, or near the relocated tow yard 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 relocated tow yard site is the Puente Creek, which passes approximately 0.4-mile northwest of the relocated tow yard site. The creek 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 relocated tow yard site (USFWS 2019). Projects proposed under the Zoning Code Amendment would occur on land designated Employment in the City's General Plan, and therefore would also not have riparian habitat or communities. As both future development sites and the relocated tow yard site are not included in local or regional plans, policies, and regulations that identify riparian habitat or other sensitive natural communities, 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. Projects proposed under the Zoning Code Amendment would occur on land designated Employment in the City's General Plan, and given their industrial nature, would not meet the definition of wetlands. Additionally, 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

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Board exist on the relocated tow yard site. The nearest water body to the relocated tow yard site is the Puente Creek, which passes approximately 0.4-mile northeast of the relocated tow yard site and is mapped on the USFWS National Wetlands Mapper as Riverine habitat (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. Development of future tow yard sites, and the relocation of the existing tow yard would 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 City, including the relocated tow yard site, is entirely developed and is surrounded by developed urban uses. Thus, neither the City nor the relocated tow yard site are available for overland wildlife movement or migration. The relocated tow yard site contains a few trees along the 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 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 relocated tow yard 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	

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Would the project:

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.

Proposed General Plan Amendment and Zoning Code Amendments

Implementation of the proposed General Plan Amendment and Zoning Code Amendments would allow for the development of tow yards on property with the General Plan designation of Employment, and zoning of Industrial, with approval of a CUP. Development of new tow yards would be located on property that is currently designated for Employment, which typically do not contain historic resources. According to the City’s General Plan Environmental Impact Report, the identified historical resources within the City include, the Workman and Temple Family Homestead Museum, the Rowland House, and the A.T. Currier House. Future tow yards would not be permitted on these sites. Therefore, no impact would occur.

15252 East Valley Boulevard – Proposed Auto Tow Yard

As shown in Figure 3, *Aerial Photograph*, one parcel is currently developed with mobile homes, and the other with structures related to the overnight truck and trash container storage use. Review of historical aerial maps shows the existing structures were developed sometime between 1965 and 1972, and have been occupied by similar uses since development (Netroline 2020). Project development on the proposed tow yard site would involve the demolition of the existing 837 square feet concrete slab, and replacement of the existing approximately 57,205 square feet gravel paving with 4-inch asphalt paving. The existing metal covered wash area with concrete pad, concrete containment area for the diesel fuel tank, and 6-inch concrete paving next to the Buildings A and C will remain, and no changes to the existing structures will occur. Additionally, there would be no physical change to the existing mobile home park under the proposed project. 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 buildings have been standing for approximately 50 years, they are not considered historic and no changes to existing structures would occur under the proposed project. Neither the building or relocated tow yard 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

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no persons of significance have resided or currently reside onsite. Additionally, the buildings are of modern construction and do not exhibit any unique architectural style or features; they are 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 relocated tow yard 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 relocated tow yard site is the structures located within the Workman and Temple Family Homestead Museum, approximately 0.4 miles to the southeast. Project development would occur within the confines of the relocated tow yard 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.

Proposed General Plan Amendment and Zoning Code Amendments

Implementation of the proposed General Plan Amendment and Zoning Code Amendments would allow for the development of tow yards on property with the General Plan designation of Employment, and zoning of Industrial, with approval of a CUP. Development of new tow yards would be located on property currently designated for Employment, which typically would be previously developed areas, as the City is almost completely built out and is in a highly developed, urban/suburban area of eastern Los Angeles County.

Grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially cause the disturbance of archeological or paleontological resources. Therefore, future development that would be accommodated by the proposed General Plan Amendment and Zoning Code Amendments could potentially unearth previously unrecorded archeological or paleontological resources. However, any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on cultural resources, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility. However, in the unlikely event that prehistoric and/or historic archaeological resources are discovered during ground-disturbing activities, mitigation measure ZCA-CUL1 has been identified to ensure impacts to archaeological resources would be less than significant.

Mitigation Measure

ZCA-CUL1 Prior to the issuance of grading permits for new tow yard projects on previously undeveloped/graded parcels, the City of Industry will require project applicants to provide

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studies (e.g., Phase I Records Search) to document the presence/absence of archeological and/or paleontological resources. On properties where resources are identified, such studies will provide a detailed mitigation plan, including a monitoring program and recovery and/or preservation plan, based on the recommendations of a qualified cultural preservation expert. The mitigation plan will include the following requirements:

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

Timing/Implementation: During future grading and construction activities

Monitoring/Enforcement: City of Industry

15252 East Valley Boulevard – Proposed Auto Tow Yard

As shown in Figure 3, *Aerial Photograph*, the relocated tow yard site is in a highly industrialized area of the City; most of the relocated tow yard site has already been disturbed due to grading and construction activities associated with current and past uses. 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. As grading would only remove the gravel layer, and no subsurface activities would occur, impacts to archaeological resources at the relocated project site would be less than significant. Adherence to regulatory requirements and implementation of the mitigation measure outlined above would reduce the potential impacts to archeological resources to a level that is less than significant.

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

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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 in lands designated as Employment, nor at the relocated tow yard site. Any property that would be developed under the General Plan and Zoning Code Amendments, including the relocated tow yard site have 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 proposed project and its operation.

Short-Term Construction

Implementation of the proposed General Plan and Zoning Code Amendments by themselves would not result in any energy demand. Rather, future tow yard projects that are currently allowed in the Industrial Zone would now have to be reviewed and approved via the City’s CUP process. Such projects, as well as development of the relocated tow yard site 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). In all cases, 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,

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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

Implementation of the proposed General Plan and Zoning Code Amendments by themselves would not result in any energy demand. Rather, future tow yard projects that are currently allowed in the Industrial Zone would now have to be reviewed and approved via the City's CUP process. Such projects, as well as operation of the relocated tow yard 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. The proposed project would result in the relocation of an existing and operational auto towing yard from 15120 Valley Boulevard to 15252 East Valley Boulevard, which is 0.2-mile from the project site. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Therefore, any increase in operation related use would be consistent with the energy use that could occur without the proposed project. 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. The proposed General Plan Amendment and Zoning Code Amendments, including the relocated tow yard would not conflict or obstruct

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with the statewide RPS requirements. 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:				
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	

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

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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.

There are no Alquist-Priolo earthquake fault zones in the City of Industry. The Walnut Creek Fault, a Quaternary Fault, partially runs through central-western Industry but it has not shown any recent activity (CGS 2010). Quaternary Faults have shown some activity in the past 1.6 million years but not since the last 700,000 years. It is not identified as an Alquist-Priolo earthquake fault and does not pose a substantial risk to peoples and structures. The closest Alquist-Priolo faults are the Whittier Fault, which runs east–west approximately two miles south of the City; the San Jose Fault, which runs east–west approximately two and a third miles north of the City; and the Chino Fault, which runs northwest–southeast approximately four miles east of the City (CGS 2010). Because there are no Alquist-Priolo fault zones in the City there is no substantial risk from an earthquake fault rupture. Further, due to the distance to the active fault, the potential for surface rupture of a fault within the City is considered very low. Therefore, implementation of the proposed project 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 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, sites of future tow yards that could be developed under the proposed the proposed General Plan Amendment and Zoning Code Amendments, including the relocated site are 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. Any future buildings and structures developed as a result of project implementation would be designed and constructed in accordance with California regulations. For example, structures for human occupancy are 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.

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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. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have seismic-related impacts, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility. 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.

All three factors that contribute to susceptibility to liquefaction are present or potentially present in various areas of the City: potential for strong earthquakes; young, loose unconsolidated sediments; and shallow groundwater depths. Additionally, as shown in Figure 5.5-3, Liquefaction and Landslide Hazard Zones, the majority of the City is within an area of liquefaction susceptibility. Projects considered for approval under the General Plan and Zoning Code Amendments could subject persons or structures to potentially significant hazards arising from liquefaction.

However, while the City is within a liquefaction zone, new tow yard projects considered for approval under the proposed project would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Individual development projects would be required to adhere to existing building and grading codes. These codes contain provisions for soil preparation to minimize hazards from liquefaction and other seismic-related ground failures. For example, Chapter 15.04 (Building Code) of the City's Municipal Code establishes rules and regulations to control excavation, grading, and earthwork construction (including fills).

Additionally, as standard procedure by the City and Los Angeles County, grading and soil compaction requires the preparation of site-specific grading plans, soils and geotechnical reports (which must address liquefaction, subsidence, and other potential soil stability hazards), and hydrology studies, which are required to be submitted to and reviewed and approved by the City and county prior to the commencement of any grading activities. Submittal of these technical plans and studies would ensure that hazards arising from liquefaction and other seismic ground failure would not occur, as they would be prepared in accordance with grading and engineering standards outlined in the most current CBC. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on sensitive receptors, the project would be subject to conformance with CEQA

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guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility.

Based on a review of the Baldwin Park Quadrangle Official Map of Seismic Hazard Zones, the relocated tow yard site is located in an area subject to liquefaction hazard (CGS 1999). However, construction would comply with all CBC standards, which would ensure adequate mitigation of the risks associated with liquefaction on or proximate to the project site. Further, no new structures would be developed, as construction activities would be limited to demolition of existing concrete paving and resurfacing the site with asphalt. 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. As shown on the State of California Seismic Hazard Zone Map for the Baldwin Park Quadrangle, portions of the Industry Hills Golf Club area are within the Zone of Required Investigation for Earthquake-Induced Landslides (CGS 1999b). Additionally, as shown on the State of California Seismic Hazard Zone Map for the San Dimas Quadrangle, portions of the area of the IBC site are within the Zone of Required Investigation for Earthquake-Induced Landslides (CGS 1999b). These areas are not designated as M for Employment in the City's General Plan and would not be affected by the proposed General Plan and Zoning Code Amendments.

The relocated tow yard 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 relocated tow yard 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. Implementation of the proposed project would result in the potential development of tow yards in lands designated for Employment with approval of a conditional use permit, as well as relocation of an existing tow yard to a new location at 15252 East Valley Boulevard. All tow yards approved under the proposed project would be required to reduce and control construction and operational erosion.

Construction Phase

Construction of future tow yards, including the relocated tow yard site would involve minor grading and paving 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

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being tracked offsite by construction vehicles exiting the site. However, development on these project sites are subject to local and state codes and requirements for erosion control and grading during construction. For example, developments are 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*. 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. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on soil erosion, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility. Therefore, soil erosion impacts from project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation Phase

New tow yards developed under the proposed project, including the relocated tow yard, would have to comply with the City's Municipal Code, Chapter 13.16 which requires preparation of a Preliminary low impact

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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. 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.

The thick alluvial deposits composing the Puente Basin that underly the City may be susceptible to compaction, with resulting subsidence at the surface, in the event of rapid groundwater withdrawal. Surface subsidence of up to 2.5 feet and ground fissuring from groundwater extraction have been reported in the City. Additionally, the young sediments underlying the City are generally dry and loose in the upper few feet, and therefore are susceptible to compression. Much of the City has historically been intensively farmed, and is therefore susceptible to compression. Furthermore, expansive soils are possible in the City where there is clay. New tow yard projects considered for approval under the General Plan and Zoning Amendments could expose structures or persons to potentially significant hazards from ground subsidence or compressed or expansive soils.

However, individual development projects would be required to adhere to existing building and grading codes. These codes contain provisions for soil preparation to minimize hazards from unstable and expansive soils. For example, Chapter 15.04 (Building Code) of the City's Municipal Code establishes rules and regulations to control excavation, grading, and earthwork construction (including fills). Additionally, as standard procedure by the City of Industry and Los Angeles County, grading and soil compaction requires the preparation of site-specific grading plans, soils and geotechnical reports (which must address liquefaction, subsidence, and other potential soil stability hazards), and hydrology studies, which are required to be submitted to and reviewed and approved by the City and county prior to the commencement of any grading activities. Submittal of these technical plans and studies would ensure that hazards arising from unstable soils would not occur, as they would be prepared in accordance with grading and engineering standards outlined in the most current CBC. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on unstable soils, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility.

The relocated tow yard and mobile home park would not be redeveloped with new structures as a result of the proposed project. The mobile home park would remain in its current condition, while the relocation of the

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tow yard would involve demolition of existing concrete ground cover and asphaltting the site. After compliance with existing regulations, risks arising from unstable and expansive soils would not be significant.

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. As stated under above in Section 3.6.c new projects would have to comply with to existing building and grading codes. Preparation and compliance with the recommendations of the required geotechnical studies would ensure that hazards arising from expansive soils would not occur, as they would be prepared in accordance with grading and engineering standards outlined in the most current CBC. The relocated tow yard and mobile home park would not be redeveloped with new structures as a result of the proposed project. The mobile home park would remain in its current condition, while the relocation of the tow yard would involve demolition of existing concrete ground cover and asphaltting the site. After compliance with existing regulations, risks arising from expansive soils would not be significant.

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. All lands designated by the City's General Plan as Employment, as well as the relocated tow yare are served by existing sewer infrastructure. Future tow yards, including the relocated tow yard 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 Most of the City 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. 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.

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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 (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), 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 this analysis.⁴ 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:

² Water vapor (H₂O) 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 2017c). 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).

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- 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.

Proposed General Plan Amendment and Zoning Code Amendments

The proposed project consists of a General Plan Amendment, Zone Change, Zoning Code Amendments, and CUP on two adjoining parcels located at 15246- 15252 East Valley Boulevard. The change in General Plan and Zoning designation will serve to make the two parcels compatible with the surrounding uses, as all surrounding properties are zoned Industrial and are designated Employment under the General Plan. In addition, implementation of the proposed project would allow for the applicant to relocate their existing tow yard operation to the 1.8-acre parcel currently being used for overnight truck and trash container storage. The mobile home park will continue to operate with no physical changes, and no portion of the mobile home park will be used for the tow yard facility. At the current time, other than the aforementioned parcels, implementation of the proposed project would not entitle or fund any specific projects and, thus, would not result in any direct physical changes to the environment. However, the proposed project could indirectly result in new development, where there may be impacts in greenhouse gas (GHG) emissions from construction activities, increased vehicle use, natural gas combustion, and other operational sources. Emissions would incrementally contribute to the global GHG levels. However, the City has multiple policies, programs, and plans in place that serve to reduce emissions. Individual development projects would be required to construct new buildings that meet California Green Building Code requirements, which would result in lower emissions from future buildings than existing buildings. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects related to GHG emissions, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility.

15252 East Valley Boulevard – Proposed Auto Tow Yard

The proposed project would result in the relocation of an existing and operational towing yard from 15120 Valley Boulevard to 15252 East Valley Boulevard. The tow yard has 28 full time employs, with 14 tow trucks operating 24-hours a day, seven days a week. Based on the applicant's data, the tow yard averages approximately 40 trips per day. Diesel powered yard equipment includes one fork-lift. The proposed project would not result in an increase in regional GHG emissions as emissions associated with the tow yard are being relocated to the project site. Annual average construction emissions, when amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project, are nominal. Overall, development and operation of the proposed project would not generate net annual emissions

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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.

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 California Air Resources Board's (CARB) Scoping Plan and the Southern California Association of Governments' (SCAG) 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 AB 32, which is to return to 1990 emission levels by year 2020, and SB 32, which is to reduce emissions 40 percent below 1990 levels by 2030 (CARB 2017a). 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.

Since adoption of the 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, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy 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 and SB 32.. 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. The proposed project would not obstruct implementation of the CARB Scoping Plan.

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

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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. The proposed project would allow for the development of new tow yards within land uses designated as Employment with a CUP, and the relocation of an existing business within the City to the relocated tow yard site. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Overall, implementation of the proposed project would not interfere with SCAG’s ability to implement the regional strategies outlined in the RTP/SCS and no impact would occur.

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

Would the project:

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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. 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).

Implementation of the proposed General Plan and Zoning Code Amendment may result in the future development of tow-yard facilities that handle, store, or transport hazardous materials during construction and operation, including at the relocated tow yard.

Construction

The City is located within the San Gabriel Valley Groundwater Basin, where portions of the Basin are considered Federal Superfund sites due to chlorinated solvents impacted groundwater. Although the relocated tow yard site is not located within an Operable Unit of the Basin, it is located upgradient from the Industry and La Puente Operable Units. Therefore, there is potential for chlorinated solvents at future development sites.

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. 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.

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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 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. Any future development that occurs will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on hazardous materials, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during construction of future tow yard facilities, including the relocated tow yard, would be less than significant and no mitigation measures are necessary.

Operation

Operation of future tow yards, including the relocated tow yard, would involve the limited use of hazardous materials for air conditioning, janitorial, maintenance, and repair activities. 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. There is potential for hazardous materials such as motor oils, transmission fluids and asbestos from brake linings to be released into the environment during vehicle storage through the storm drain system; however, standard best management practices described in Section 3.10.a would control the release of such materials into the environment. Used motor oil would be removed from the site by a certified waste hauler.

Some tow yard facilities would include above ground storage tanks (AST) or underground storage tanks (UST) utilized for fuel storage. These tanks would be required is located within a containment area. Operation of these storage tanks would be regulated by the South Coast AQMD, which would ensure that impacts related to potential storage tank use for vehicle fueling would not result in an adverse impact.

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Furthermore, the use, storage, transport, and disposal of hazardous materials of the tow yards, including the relocated tow yard, 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.

Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. 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. No removal of hazardous materials onsite would occur under the proposed project. Therefore, impacts 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. There are two public K–12 schools in the City (William Workman High School and Torch Middle School). However, development of new tow yard facilities that could occur with implementation of the General Plan and Zoning Amendments would not increase the intensity of industrial land use in the vicinity of these sensitive land uses whereby they may be impacted by increased facility emissions. Additionally, emissions from industrial business are regulated by various federal, state and local laws, including those outlined by SCAQMD and DTSC. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. The relocated tow yard is not located within 0.25 miles of an existing or proposed school. The nearest school to the project site is La Puente High School, located approximately 0.4 mile to the northeast. Therefore, no impact would occur.

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.

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Proposed General Plan and Zoning Code Amendments

The City encompasses an area that includes numerous businesses that have had historical releases of hazardous substances to the environment and/or are undergoing environmental investigation or remediation. If a future tow yard were proposed on such a site, the project would be subject to various federal, state, and local laws and agencies that regulate hazardous material sites, such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), the state and federal Environmental Protection Agencies (EPA), the California Department of Toxic Substances Control (DTSC), and the Los Angeles County Fire Department. Compliance with the CERCLA, RCRA, California Code of Regulations, Title 22, and related requirements would remedy any potential impacts caused by hazardous substance contamination. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Therefore, future development that would be accommodated by the General Plan and Zoning Code Amendments would result in a less than significant impact upon compliance with existing laws and regulations.

15252 East Valley Boulevard – Proposed Tow Yard

Five environmental databases were searched for hazardous materials sites and within a quarter mile radius of the relocated tow yard site:

- GeoTracker. State Water Resources Control Board (SWRCB 2015)
- EnviroStor. Department of Toxic Substances Control (DTSC 2020)
- EJScreen. US Environmental Protection Agency (USEPA 2018)
- EnviroMapper. US Environmental Protection Agency (USEPA 2020)
- Solid Waste Information System. California Department of Resources Recycling and Recovery (CalRecycle 2020)

The project site is not identified on any of the databases. Several sites are located within a 0.25-mile of the project site. These sites are all part of the Cleanup Program with most cases being closed. There is an open case site with a site assessment to the north of the project site across East Valley Boulevard. However, project development would be confined to the project site and these sites do not present a potential environmental risk to the project site. 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 City of Industry has three heliports: the Recreation and Conference Center Heliport, the Los Angeles County Sherriff's Department Heliport, and Haddick's Heliport. The development of future tow yard facilities that could occur under the proposed General Plan and Zoning Code Amendments would be required to comply with the height restrictions imposed by the Industrial zone. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for

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the future development of tow yards in the City. As such, future development would not adversely impact the safety or air traffic patterns of those facilities.

The relocated tow yard 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 5.6 miles to the northwest. The Los Angeles County Sheriff's Department helipad and Haddicks Towing Inc. helipad is located approximately 0.3 miles and 0.2 miles to the northeast and east, respectively. 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 any of the daily operations of the City's Emergency Operation Center, LACoFD, or Los Angeles County Sheriff's Department. All construction activities would be required to be performed per the City's and LACoFD's standards and regulations. For example, future tow yard projects, including the relocated tow yard 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. Similarly, future tow yard projects, including the relocated tow yard project, would also be required to go through the City's 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.).

Any future development that occurs under the proposed project will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on the relevant emergency operations plans, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compatibility. Therefore, the proposed project would not impair implementation of or physically

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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 relocated tow yard site is not in or near a state responsibility area or land classified as very high fire hazard severity zone (CAL FIRE 2007b). Future tow yards that could be developed under the proposed project are required to comply with the Fire Code, which incorporates the International Fire Code and California Fire Code by reference. All building plans in the City must undergo a plan review by LACFD to ensure compliance with the Fire Code. Using fire-resistant building materials, implementing fuel modification zones, and maintaining vegetation clearance around structures can help protect developed lands from fires, thereby reducing the potential loss of life and property. 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:				
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

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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). New tow yards developed under the General Plan and Zone Change Amendments, including the relocated tow yard’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 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 3-3, *Construction Best Management Practices*. Under the proposed project, all tow yards within the City, including the relocated tow yard will be a minimum of 1.5 acres, and will have to prepare a SWPPP.

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Table 3-3 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

Future tow yard 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 3-3, 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(s) 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.

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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.

It is anticipated that any tow yard project, including the relocated tow yard, that would be developed as a result of the General Plan and Zoning Code Amendment would include modification of a site greater than one acre, and have parking for over 25 vehicles. Such projects, including the relocated tow yard, would be required to comply with the City's municipal National pollutant discharge elimination system (NPDES) requirements for controlling urban runoff and waste discharges. 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.

As stated in Section 13.16.070 of the City's Municipal Code, future tow yard projects are required to comply with stormwater BMPs listed in the SUSMP or the "BMP Guidebook" prepared or recommended by the City Engineer. Alternative compliance measures specified in the municipal NPDES permit include the following:

- a) On-site biofiltration;
- b) Off-site infiltration;
- c) Ground water replenishment projects;
- d) Off-site project—retrofit existing development; and
- e) Regional stormwater mitigation program.
- f) Hydromodification.

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. 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.

Under the proposed project, future tow yard projects will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on water quality, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compliance with Section 13.16.070 of the City's Municipal Code. Based on the preceding, no significant water quality and waste-discharge impacts from project operation activities would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The City site is located within the San Gabriel Valley Groundwater Basin where portions of the Basin are considered Federal Superfund sites due to chlorinated solvents impacted groundwater. Water to the City 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). Nearly all of the City, including the relocated tow yard site, is developed with highly urbanized uses and are therefore not available for or designated as areas for groundwater recharge. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Future tow yard projects considered for approval under the General Plan and Zoning Code Amendments would also have to implement BMPs to minimize runoff and provide for infiltration of stormwater into the soil onsite in accordance with the County of Los Angeles' Manual for the Standard Urban Stormwater Mitigation Plan. 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. Implementation of the proposed General Plan and Zoning Code Amendments would potentially result in development of tow yards on previously developed land within the City. The City is highly urbanized, built-out, is largely flat; and soils have already been disturbed by existing development. Although soils at future development sites, including the relocated tow yard site could experience erosion during construction, implementation of the proposed project would not cause substantial soil erosion. as set forth in Section 13.16.070 of the City's Municipal Code, a SUSMP specifying BMPs for minimizing pollution of stormwater with soil and sediment during project construction would be prepared and implemented. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. 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. All future development that would potentially occur under the proposed Zone Code Amendments would be required to implement the BMPs required under Section 13.16.70 of

3. Environmental Analysis

the City's Municipal Code to ensure that surface runoff would not exceed the capacity of the existing storm drains within the City. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Thus, implementation of the General Plan and Zoning Code Amendments and relocation of the existing tow yard would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, 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 discussed above, implementation of the BMPs required under Section 13.16.70 of the City's Municipal Code would ensure that surface runoff would not exceed the capacity of the flow into existing storm drains within the City. 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 majority of the City is in the Shaded Zone X flood hazard zone as designated by the Federal Emergency Management Agency (FEMA 2008). Zone X is the categorization of areas outside the 100- and 500-year floodplains. 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 City 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 City is approximately 24 miles inland from the Pacific Ocean. Therefore, the City 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.

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

No Impact. Water quality in City 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 City 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, with the exception of residential uses directly to the west. By rezoning the project site, and amending the City’s General Plan, actually creates uniform and consistent zoning in the area. The proposed relocation of the tow yard includes the demolition of the existing concrete slab and replacement of the existing gravel paving with 4-inch asphalt paving on a site currently occupied by vehicle and trash container storage and in a highly industrialized area of the City. 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.

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

Less than Significant Impact. The project site is zoned and has a General Plan designation of Commercial (Industry 2019; 2014). The proposed project would require additional approvals from the City, including:

- General Plan Amendment to change the land use designation from Commercial to Employment
- Zone Change from Commercial (C) to Industrial (M)
- Zoning Code Amendment to amend the City's Zoning Map to change the zoning designation of the properties located at 15246 and 15252 East Valley Boulevard from Commercial to Industrial
- Zoning Code Amendment to remove an automobile and truck towing yard as a permitted use and add an automobile and truck towing yard as a conditionally permitted use in the Industrial (M) zone, subject to (a) any portion of the property used for storage or impound to be screened from public view; (b) minimum lot size of one acre; and (c) yard shall be improved with asphalt, concrete, or other paved surface
- Conditional Use Permit for the use of an automobile towing yard and vehicle storage at the 1.8-acre site

The uses in the immediate vicinity have the General Plan land use designation of Employment, and a Zoning designation of Industrial. Approval of the proposed project would allow the adjoining parcels to be consistent with the surrounding uses. Overall, the City's land use pattern reflects its main purpose, with approximately 82 percent of the City devoted to industrial, commercial, and commercial recreational uses. The Zoning Code amendment would result in amending Sections 17.16.025 (Permitted uses) and 17.16.010 (Uses permitted with a CUP) under Chapter 17.16 (Industrial Zone) of the City's Municipal Code. Currently, an 'automobile and truck towing yard' is permitted by right under 17.16.10.D., provided that the yard is constructed of reinforced structural concrete and is enclosed with a minimum eight-foot-high obscuring material. These actions will make the zoning and general plan designations consistent with the surrounding properties and will allow for 'automobile truck towing yards' as a Citywide permitted use in the "M" – Industrial zone with approval of a CUP. The housing will be able to remain as a legal non-conforming use under Section 17.40.070 of the City Code, and is consistent with the City's Housing Element (2013-2021) Goal 2, Policy 2.4: by encouraging the preservation of existing housing units within the City.

The proposed project would represent a new land use on the site and in the immediate area but would not in itself result in environmental impacts related to land use and planning. The proposed project would not conflict with existing City policies or regulations that were adopted for the purpose of mitigating an environmental effect. Instead the proposed project would further the City' goal as articulated in the General Plan. The proposed project would be consistent with the General Plan Policies as described in Table 3-4, General Plan Consistency Analysis.

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Goal/Policy	Project Consistency
Goal: LU1 An employment and commercial hub for the San Gabriel Valley and Los Angeles metropolitan area.	
LU1-1 Accommodate business and employment uses as the primary land use.	The project site is located in a highly industrialized area consisting of industrial operations and commercial uses with General Plan. The proposed project would allow for the continued operation of Haddick's Towing at a new location within the City of Industry, while allowing the existing mobile home park to remain in place. The proposed General Plan and Zoning Change and Zoning Code Amendments would provide for uniformity of land uses in the area.
LU1-2 Permit limited ancillary uses on industrial sites, such as limited office use and showrooms, as necessary to support basic industrial activities.	The proposed project would be consistent with this policy as no physical changes to the existing automobile storage yard would occur other than the repaving activities. Existing structures would remain on both parcels.
LU2 A competitive business climate and blend of businesses that best serve the long-term economic future of the City of Industry.	
LU2-3 Encourage the consolidation of smaller lots and large industrial lots to be occupied by a single tenant as opposed to multiple tenants.	The proposed project would allow for the conforming use of a tow yard on a parcel that currently does not allow for such uses. Occupation of the lot by the tow yard will allow for the applicant to continue operating within the City of Industry.
LU3 A mutually beneficial and compatible relationship with non-business resources and surrounding jurisdictions.	
LU3-1 Minimize impacts (including noxious fumes, air pollutants, excessive noise, and hazardous materials) to non-business uses through the use of land use regulations, site planning, and design controls.	Implementation of the proposed project will bring into conformance two properties to be consistent with all the surrounding properties, the surrounding properties already consist mainly of industrial uses. Further, by requiring a CUP for future tow yard project, the City can review all future projects for land use compatibility.
LU4 Staff, regulations, and processes that allow flexible responses to conditions and circumstances in furtherance of the City's Vision.	
LU4-1 Maintain clear development standards but allow flexibility in their application to achieve the Vision.	Approval of the proposed project, including the General Plan and Zoning Change and Zoning Code Amendment would allow for the continued operation of an established business in a new location within the City. The proposed project would be consistent with this policy.
LU4-2 Allow flexibility in the application of development standards for those uses that support the Vision and when necessary to minimize impacts on surrounding uses.	The General Plan and Zoning Change and Zoning Code Amendment would provide specific development standards to the relocated tow yard and future tow yard developments that were not available under the current land use designation and zoning. The proposed project would be consistent with this policy.
LU5 High quality and well-maintained properties, buildings, and infrastructure that enhance property values and encourage additional public and private investment.	
LU5-3 Prohibit outside storage and mechanical equipment that is visible from the street.	Implementation of the proposed project would require the tow yard to be completely screened from public view with minimum eight foot high obscuring material. The proposed project would be consistent with this policy.
LU5-4 Maintain a professional appearance on private lands through application of standards that address landscape, building, and signage treatments.	The proposed project would be completely screened from public view with minimum eight foot high obscuring material. The proposed project would be consistent with the current policy.

Through the City's development review process—which includes City of Industry Planning Commission's and City Council's review and consideration of the project—the City would ensure that approval of future tow yard projects would not conflict with any of the City's applicable land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect. Upon approval, the zoning

3. Environmental Analysis

and General Plan land use of the project site would be consistent with surrounding uses. Therefore, impacts would be less than significant and no mitigation measure 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. There are currently no permitted mining operations within the City. In addition, the City’s General Plan does not identify mineral resource areas within the City boundaries. Project implementation 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’s 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’s General Plan. Therefore, no impact would occur and no mitigation measures are necessary.

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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 with Mitigation Incorporated.

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 mobile home park and automobile towing yard and storage. 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 the existing homes in the mobile home park adjacent to the relocated tow yard, and single-family residential uses located approximately 1,150 feet to the north in the City of La Puente. Both areas are currently exposed to noise from the surrounding commercial, industrial, and residential

3. Environmental Analysis

uses, and nearby traffic along major arterials. According to the City’s General Plan Safety Element, existing ambient noise levels in the project vicinity are approximately 80.5 dBA (Industry 2014).

Regulatory Setting

City of Industry Municipal Code

The City of Industry addresses public nuisances under Chapter 1.30 (Public Nuisance) of the City’s Municipal Code, and noise from entertainment uses is addressed under Chapter 17.12. However, the City does not have a Noise Ordinance prescribing maximum permissible noise levels. For CEQA analyses and corresponding mitigation recommendations, the City typically defers to the County of Los Angeles’s Noise Ordinance. For the purpose of CEQA analysis for projects in the City, the noise standards contained in the County’s noise ordinance are used as significance thresholds for noise.

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.

County of Los Angeles Noise Standards

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 3-5, *County of Los Angeles Exterior Noise Standards*, below:

Table 3-5 County of Los Angeles Exterior Noise Standards

Noise Zone	Time Period	Maximum Permissible Noise Level (dBA) ^{1,2}				
		Standard 1 (L ₅₀)	Standard 2 (L ₂₅)	Standard 3 (L ₈)	Standard 4 (L ₂)	Standard 5 (L _{max})
Noise-Sensitive Area	Anytime	45	50	55	60	65
Residential Properties	10 PM to 7 AM	45	50	55	60	65

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Table 3-5 County of Los Angeles Exterior Noise Standards

Noise Zone	Time Period	Maximum Permissible Noise Level (dBA) ^{1,2}				
		Standard 1 (L ₅₀)	Standard 2 (L ₂₅)	Standard 3 (L ₅)	Standard 4 (L ₂)	Standard 5 (L _{max})
Commercial Properties	7 AM to 10 PM	50	55	60	65	70
	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.

NOISE IMPACT ASSESSMENT

The generation of noise and vibration associated with the proposed General Plan and Zoning Code Amendments and development of the relocated tow yard would occur over the short-term for site construction activities. In addition, noise would result from the long-term operation of new or relocated tow yards. Both short-term and long-term noise impacts associated with the project are examined in the following analyses that correspond to the CEQA Guidelines.

Construction Noise

General Plan and Zone Ordinance Amendments

Short-term noise impacts that could occur during construction include vehicular traffic noise from construction workers, vendor vehicles and haul trucks on public roadways, and heavy construction equipment operating on individual project sites.

First, the transport of workers and movement of materials to and from development project sites could incrementally increase noise levels along roadways. The second type of short-term noise impact is related to demolition, site preparation, grading, and/or physical construction. Construction is performed in distinct steps, each of which has its own mix of equipment, and, consequently, its own noise characteristics. However, despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Under typical conditions, construction activities associated with new or relocated tow yards would be anticipated to reach maximum noise levels of 85 dBA at a distance of 50 feet from the receptor.

Construction of individual developments associated with implementation of the General Plan and Zone Code Amendments would temporally increase the ambient noise environment in the vicinity of each individual project. When construction creates a noise disturbance across a residential or commercial real-property line, the City restricts the hours of construction activities⁵ to the least noise-sensitive portions of the day (i.e., between 7:00 AM and 7:00 PM for Monday through Saturday). Under the City's current Code, tow yards are

⁵ Except for emergency work of public service utilities or by variance.

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already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Under the proposed project, future tow yard projects will be evaluated by City Staff, and if new tow yard construction related noise levels would potentially have adverse effects on sensitive receptors, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. Through this review process, appropriate mitigation measures would be identified, including limiting the hours of construction, temporary noise barriers and ensuring that equipment are properly muffled. However, construction activities associated with any individual development may occur near noise-sensitive receptors and noise disturbances may occur for prolonged periods of time, construction noise impacts associated with implementation of the General Plan Update are considered potentially significant. In order to ensure that noise from future tow yard construction does not adversely impact sensitive receptors, the mitigation measure ZCA-NO1 has been identified:

Mitigation Measure

ZCA-NO1 Construction activities associated with new development that occurs near (normally within 500 feet) sensitive receptors will be evaluated for potential noise impacts. Mitigation measures such as installing temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing nonessential idling of construction equipment to no more than five minutes will be incorporated into the construction plans to reduce construction-related noise to the extent feasible.

Timing/Implementation: During project review of future tow yards located within 500 feet of sensitive receptors

Monitoring/Enforcement: City of Industry

15252 East Valley Boulevard – Proposed Auto Tow Yard

At the relocated tow yard, the nearest residential property line is the mobile home park adjacent to where construction would take place. Since construction activities are anticipated to be relatively short-term and temporary (approximately two months or less), construction noise would be infrequent and short lived. Additionally, according to the City's General Plan Safety Element, existing ambient noise levels in the project vicinity are approximately 80.5 dBA (Industry 2014). As the loudest construction related activity is anticipated to be approximately 80 dBA from paving, construction related activities would not exceed the ambient noise levels, and would not violate the noise thresholds established in the Los Angeles County noise regulations. With compliance with the Los Angeles County noise regulations would ensure noise levels from construction equipment would be less than significant.

Operational Noise

General Plan and Zone Ordinance Amendments

Future tow yard development within the City's Employment land use designation with the Industrial zoning would occur with project implementation. Such development would have the potential to cause increases in noise in the vicinity of each development project. The siting of new industrial developments may increase noise

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levels to nearby uses. Each individual development project would be subject to review under CEQA. New industrial, retail, and institutional projects would have to demonstrate that the operation of each project would not exceed the thresholds established by the Los Angeles County noise regulations. Future projects in the vicinity of noise sensitive receptors would be required to demonstrate that operation would not impact noise sensitive receptors. According to the City's General Plan Safety Element, ambient noise levels within the City range between 69 dBA CNEL to 83 dBA CNEL. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. As any new tow yard approved with a CUP would be located in land use designated as Employment and zoned Industrial, it is not anticipated that tow yard related noise would increase ambient noise levels, and impacts would be less than significant.

15252 East Valley Boulevard – Proposed Auto Tow Yard

The relocated tow yard site is currently used by a waste disposal company for storage of vehicles and trash containers and would be converted for use as an auto towing yard. It is anticipated that noise levels from the relocated tow yard would be similar to those that currently occur on the site, as the current functions are similar in nature to the proposed new use, as the waste management company operates 24-hours a day. The mobile home park is currently surrounded by industrial uses and noise levels from project operation would continue to comply with pertinent local noise regulations. As previously stated, noise levels in the proposed project vicinity are estimated to be approximately 80.5 dBA. Implementation of the relocated tow yard would not result in a substantial increase in ambient noise levels. Therefore, noise levels from project operation 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

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, and slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures, but groundborne vibration and groundborne noise can reach perceptible and audible levels in buildings that are close to the construction site. Typical construction activities can produce vibration levels of up to 87 Vdb, which would be considered substantial.

However, groundborne vibration is almost never annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers (FTA 2006). Significant vibration impacts may occur from construction activities

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for individual development projects. Implementation of the General Plan and Zoning Code Amendments would allow for the development of new tow yards within the City, but specific locations, site plans, and construction details have not been developed at this time. Further, under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Construction would be localized and would occur intermittently for varying periods of time. Because specific, project-level information is not available at this time, it is not possible to quantify the construction vibration impacts at specific sensitive receptors.

In construction projects, grading and demolition activities typically generate the highest vibration levels during construction activities. Except for pile driving, maximum vibration levels measured at a distance of 25 feet from an individual piece of typical construction equipment do not exceed the thresholds for human annoyance for industrial uses, nor the thresholds for architectural damage. Under the proposed project, future tow yard projects will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on vibration sensitive receptors, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. As such, impacts would be less than significant and no mitigation measures are necessary.

Operational Activities

Implementation of the proposed General Plan and Zoning Code Amendments would include truck movement activity on the on future development sites and the relocated tow yard 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 5.6 miles to the northwest. As noted earlier, the City has three private heliports: the Recreation and Conference Center Heliport, Los Angeles County Sheriff's Department Heliport, and Haddicks Heliport. Single-event noise from helicopter overflights can substantially elevate noise levels at receptors in the vicinity of each heliport during take-offs and landings. None of these heliports have helicopters based at these locations, and there are no plans to expand service and operations at these heliports. Noise from helicopter operations in the City is very sporadic and short term. The nearest noise-sensitive locations from any heliport are residences located 750 feet away from the Los Angeles Sheriff's Department Heliport. Because there are no plans to expand helicopter operations at these locations, and noise from the operation of the heliports are sporadic and short term when they occur, implementation of the proposed project would not result in a change

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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. Implementation of the General Plan Amendment, Zoning Code Amendments, and Zone Change would not indirectly cause population growth, as they merely create uniformity of zoning within the City, and add a CUP requirement for the development of new tow yards. 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 project site is also provided with adequate road access and project development would not require extension of roadways. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. 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. Implementation of the proposed project is required to make the general plan designations and zoning consistent throughout the surrounding area. No housing would be removed as a result of the proposed project. Therefore, the proposed project would not displace housing or people. No impact would occur and no mitigation measures are necessary.

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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:				
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?

No Impact. The Los Angeles County Fire Department (LACoFD) provides fire protection and emergency medical services to the City. Project implementation would not result in an increase in calls for fire protection and emergency medical services. Considering that tow yards are an allowable use in the Industrial Zone, 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, during the development review and permitting process, LACFD would review and approve individual development projects to ensure that adequate facilities, infrastructure, and access are provided to serve the needs of LACFD. For example, individual development projects would be required to incorporate adequate fire protection facilities to the satisfaction of LACFD, as outlined in Section 17.36.080 (Standard Conditions of Approval) of the City’s Municipal Code. Specific fire and life-safety requirements for the construction phase of future development projects would be addressed at the building and fire plan check review for each development project. All development projects within the City would also be required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of Industry, Los Angeles County, and the State of California. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compliance with existing codes and regulations.

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Based on the preceding, the proposed General Plan and Zoning Code Amendments and relocated tow yard 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, and no impact would occur.

b) Police protection?

Less Than Significant Impact. The Los Angeles County Sheriff's Department (LASD) provides police protection to the City. Project implementation would not result in an increase in calls for police services. Considering that tow yards are an allowable use in the Industrial Zone, 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. All site and building improvements proposed under the proposed General Plan and Zoning Code Amendments and relocated tow yard would be subject to review and approval by LASD. Further, while the Zoning Code Amendment would apply to all land uses with an M designation, the development of any tow yard would require a CUP, which would ensure the City is able to review each application for compliance with existing codes and regulations.

Based on the preceding, the proposed General Plan and Zoning Code Amendments and relocated tow yard 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, and no impact would occur.

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 General Plan and Zoning Code Amendments and relocated tow yard, 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.

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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

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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 B to this Initial Study.

- *San Gabriel Valley Council of Governments VMT Evaluation Tool Report, San Gabriel Valley Council of Governments, 2020, August 4.*

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.

Proposed General Plan and Zoning Code Amendments

Implementation of the proposed General Plan and Zoning Code Amendments would not result in an increase tow truck activity on City streets. 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. The resolution mandates that all new development projects, including those contemplated under the proposed project undergo both a level of service (LOS) and a VMT analysis. Any future development projects that could occur under the proposed Code Amendment would be subject to the City’s Transportation Impact Analysis Guidelines, which require analysis of transportation impacts and system improvements as necessary to offset such impacts. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. As such, impacts would be less than significant.

15252 East Valley Boulevard – Proposed Auto Tow Yard

As shown in Figure 4, *Proposed Site Plan*, vehicular access for the relocated tow yard site would be provided via the existing 28.5-foot wide driveways connection via East Valley Boulevard, similar to existing conditions. The proposed project is estimated to generate a maximum of 40 trips during weekday peak hours. In comparison to existing traffic on East Valley Boulevard, 10, 669 ADT (LA County Public Works 2019), project contribution represents a worst-case increment of less than 1 percent. Therefore, the proposed project would not conflict with the goals and policies established in the City’s Circulation Element, which aims to maintain a desired level of service on roadways facilities.

Pedestrian access to the relocated tow yard site would continue to be the existing driveway and connected to the public sidewalk on East Valley Boulevard. The proposed project would not alter the existing public sidewalk. Additionally, there are no bicycle lanes or facilities adjacent to or within proximity of the site.

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Foothill Transit provides public transit bus services within the vicinity of the project site. Line 194 is the closest bus line to the project site that runs along East Valley Boulevard. The bus line has approximately 15- to 30-minute frequencies and runs from EL Monte to Pomona. The closest stop to the project site is at Puente 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 circulation system, including transit, roadway, bicycle and pedestrian 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)?

Less than Significant 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 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 the appropriate baseline VMT for projects. The Baseline VMT is defined as the average VMT for the City at the time of the Notice of Preparation (or Notice of Intent for Negative and

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Mitigated Negative Declarations) release. The specific form of the metric depends on 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 from 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.

All future projects contemplated under the General Plan and Zoning Code Amendment would be required to undergo evaluation based on the new VMT thresholds, and a determination would be made on an individual basis. If the proposed tow yard did not screen out, further analysis would be required, and appropriate mitigation measures would be included in the CEQA document.

Consistent with Resolution CC2020-20, utilizing the SGVOG VMT Evaluation Tool, the relocated tow yard was determined to be screened out from further analysis, as the project is located in a TPA zone. Further, the relocated tow yard is an existing use and would not generate any new vehicle trips. 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. Development of new tow yards in land designated Employment and zoned Industrial could result in some changes to the City's circulation network, but would not increase hazards or impact emergency access due to design features. The City has adopted roadway design standards (e.g., design speed, lane dimensions, turning radius, setbacks, sight distance) that preclude the construction of any unsafe design features. The City of Industry Municipal Code also contains design and development standards that would be applicable to development. For example, Section 17.36.040 (Contents of Development Plan) requires that project applicants submit a development plan for review, which must contain a site plan showing, among other things, internal circulation pattern; access and circulation; pedestrian, vehicular, service; and points of ingress and egress.

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Adherence to the design and development standards would ensure that safe and efficient movement of vehicles and pedestrians is provided throughout the various areas of the City. Under the proposed project, future tow yard projects will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on vibration sensitive receptors, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. All future tow yard projects would also be required to comply with the adopted City of Industry Standard Plan requirements for street improvements, driveways, sidewalks, pedestrian ramps, etc.

Similarly, development of the relocated tow yard would retain the existing 28.5-foot wide driveways connection via East Valley Boulevard, similar to existing conditions, and no change would occur to the mobile home park's access. Furthermore, the relocated tow yard site 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. 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. Development of new tow yards in land designated Employment and zoned Industrial would not result in impacts to emergency access. To address emergency and fire access needs, internal driveways at the project site would meet the minimum width requirements for allowing the passing of emergency vehicles. Under the proposed project, future tow yard projects will be evaluated by City Staff, and if new tow yard development would potentially have adverse effects on vibration sensitive receptors, the project would be subject to conformance with CEQA guidelines and the City of Industry General Plan regulations. 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.

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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. The entire City, including the parcels located at 15246-15252 East Valley Boulevard, consists of developed land, and the aforementioned parcels are currently developed with a mix of commercial and industrial uses. Development of new tow yards, including the relocated tow yard would occur on land that has been previously occupied and disturbed. Construction of new tow yards would not involve major excavation or grading activities.

As shown in Figure 3, *Aerial Photograph*, the relocated tow yard site is currently developed with buildings and covered areas, totaling 8,537 square-foot. Review of historical aerial maps shows the existing structures were developed sometime between 1965 and 1972 and have been occupied by similar uses since development (Netroline 2020). Project development would involve the repaving of existing gravel 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

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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 21080.3.1 (b), 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 August 13, 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 entire City is also heavily disturbed from its historical commercial and industrial uses and therefore has already been subject to similar construction and ground-disturbing activities that would occur under the proposed General Plan and Zoning Code Amendments. 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.

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

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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	
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 any future tow site, including the relocated tow yard site. SGVWC obtains its water supplies from two sources, 31 wells located in the Main San Gabriel Groundwater Basin, and from four wells located in the Central Groundwater Basin (SGVWC 2020). Implementation of the General Plan and Zoning Code Amendments would provide the City with greater discretion over the development of new tow yard sites as the development of such sites would now require a CUP. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City.

The proposed project would also facilitate the relocation of an existing and operational towing yard from 15120 Valley Boulevard to 15252 East Valley Boulevard, which is 0.2-mile from the project site. The relocated tow yard, mobile home park, and the area for landscaping on the project site would remain the same would not increase water usage above existing conditions. Additionally, SGVWC estimates that it will have sufficient water supplies to meet proposed growth for normal, single-dry, and multiple-dry years (SGVWC 2017), including the

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development of new tow yards with approval of a CUP. 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.

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. 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 at the relocated tow yard would be similar to existing conditions. Future tow yards would use minimal wastewater, compared to the SJCWRP's remaining capacity. Implementation of the General Plan and Zoning Code Amendments proposed project would provide the City with greater discretion over the development of new tow yard sites as the development of such sites would now require a CUP. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Therefore, the proposed General Plan and Zoning Code Amendments 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 future tow yard sites, including the relocated tow yard site would be provided by Southern California Edison (SCE) or the Industry Public Utilities Commission (IPUC) via existing infrastructure in the immediate area of the project site. Electric power uses under the proposed project will include indoor lighting, office appliances, equipment for maintenance and welding, and security systems. All utility connections that would occur as a result of the General Plan and Zoning Code Amendments would be required to comply with applicable federal, state, and local regulations related to electric power supply. Implementation of the General Plan and Zoning Code Amendments proposed project would provide the City with greater discretion over the development of new tow yard sites as the development of such sites would now require a CUP. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. 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)

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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. Implementation of the General Plan and Zoning Code Amendments proposed project would provide the City with greater discretion over the development of new tow yard sites as the development of such sites would now require a CUP. Under the City's current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. Therefore, the General Plan and Zoning Code Amendment's natural gas demand is within SoCalGas' forecast increase and the proposed 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, the General Plan and Zoning Code Amendments 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., SGCWC will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry and multiple dry years (SGCWC 2017). Additionally, any landscaping proposed under the General Plan and Zoning Code Amendments would be required to comply with Chapter 13.18 (Water Efficient Landscapes) of the City's Code, which sets landscape design standards for water conservation. Therefore, impacts on water supplies due to the proposed project 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 proposed under the General Plan and Zoning Code Amendments. Implementation of the proposed project would not require construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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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 2018, 83 percent of solid waste generated in the City is disposed of 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 3-6, *Landfill Capacity*. As shown in the table, the landfills have a combined residual capacity of over 10,698 tons per day.

Table 3-6 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

¹Average 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.

The relocated tow yard is estimated to generate a similar amount of solid waste compared to existing conditions, and future tow yards would be required to comply with all existing local, state and federal regulations regarding solid waste disposal. Implementation of the General Plan and Zoning Code Amendments proposed project would provide the City with greater discretion over the development of new tow yard sites as the development of such sites would now require a CUP. Under the City’s current Code, tow yards are already permitted in the Industrial Zone, the Zoning Code amendment merely adds a CUP requirement for the future development of tow yards in the City. 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.

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.

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- **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

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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 potential sites for new tow yards, including the relocated site are 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, potential sites for new tow yards, including the relocated site are 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, potential sites for new tow yards, including the relocated site are 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, potential sites for new tow yards, including the relocated site are is not in or near an SRA or LRA or lands classified as high fire severity zones. The topography of the potential tow yard sites are anticipated to be relatively flat and not susceptible to landslides. Additionally, implementation of

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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 ZCA-CUL1 would ensure that impacts to archeological resources do not occur.

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- 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 urbanized 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 with Mitigation Incorporated. 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. Potential impacts to humans could occur as a result of locating new large-scale tow yard operations (greater than 100 truck) within 1,000 feet of sensitive receptors; however, implementation of mitigation measure ZCA-AQ1 and ZCA-NO1 would reduce impacts to less than significant.

3. Environmental Analysis

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4. References

- California Air Pollution Control Officers Association (CAPCOA). 2017. California Emissions Estimator Model (CalEEMod). Version 2016.3.2. 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. 2005, April Air Quality and Land Use Handbook: A Community Health Perspective
- . 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change. <https://ww3.arb.ca.gov/cc/scopingplan/document/psp.pdf>.
- . 2017a, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.
- . 2017b, 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.
- . 2017c, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.
- . 2018a, October. Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.
- . 2018b, February. Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.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 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 Fish and Wildlife (CDFW). 2019, April. California Natural Community Conservation Plans. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.
- . 2020, August 15 (accessed). Biogeographic Information and Observation System (BIOS). <https://apps.wildlife.ca.gov/bios/>.
- 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/>.
- . 2020g. SWIS Facility/Site Search. <https://www2.calrecycle.ca.gov/SWFacilities/Directory>
- California Department of Transportation (Caltrans). 2020, August 18 (accessed). California Highway System. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=026e830c914c495797c969a3e5668538>.
- California Division of Oil, Gas, and Geothermal Resources (DOGGR). 2020, August 17 (accessed). Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#/-117.96541/34.02572/16>
- California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. https://www2.energy.ca.gov/title24/2019standards/documents/Title24_2019_Standards_detailed_faqs.pdf
- 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.

4. References

- . 2010. Fault Activity Map of California. August 18, 2020 (accessed).
<https://maps.conservation.ca.gov/cgs/fam/>.
- California State Parks, Office of Historic Preservation (OHP). 2020, August 17 (accessed). California Historical Landmarks By County.
<https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19>.
- Department of Toxic Substances Control (DTSC). 2020. EnviroStor.
<http://www.envirostor.dtsc.ca.gov/public/>.
- Federal Emergency Management Agency (FEMA). 2008, September 26. FEMA Flood Map Service Center: Search By Address.
<https://msc.fema.gov/portal/search?AddressQuery=15252%20valley%20blvd%2C%20industry#searchresultsanchor>.
- Industry, City of. Industry, City of. 2011. Water Purveyors Map.
<https://www.cityofindustry.org/home/showdocument?id=206>.
- . 2014, June 12. General Plan. <https://www.cityofindustry.org/home/showdocument?id=1693>.
- . 2019. June 19. Zoning. <https://www.cityofindustry.org/home/showdocument?id=6843>.
- LA County Public Works. 2020. Machine Count Traffic Volumes.
<https://pw.lacounty.gov/tnl/trafficcounts/?street=Valley&cross=>
- 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>.
- . 2020, August 18 (accessed). LA County Soil Types. Open Data website.
<https://data.lacounty.gov/Shape-Files/LA-County-Soil-Types/sz94-meiu>.
- Netronline. 2020, August 17 (accessed). Historic Aerials. <https://www.historicaerials.com/viewer>
- Office of Mine Reclamation (OMR). Mines Online. 2020, August 17 (accessed).
<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>.

4. References

- South Coast Air Quality Management District (South Coast AQMD). 1993. California Environmental Quality Act Air Quality Handbook. [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))
- . 2003, August. 2003 Air Quality Management Plan. <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp>
- . 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. Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting 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-main-presentation.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf).
- . 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/cal-eemod-guidance.pdf?sfvrsn=2>.
- . 2017, March 4. Final 2016 Air Quality Management Plan. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.
- . 2019, April (revised). South Coast AQMD Air Quality Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>
- Southern California Association of Governments (SCAG). 2016, April 7. Final 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>.
- . 2020, May. Proposed Final: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Connect SoCal. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>
- Southern California Edison. 2019, May. 2018 Sustainability Report. <https://www.edison.com/content/dam/eix/documents/sustainability/eix-2018-sustainability-report.pdf>.
- State Water Resources Control Board (SWRCB). 2015. GeoTracker. <http://geotracker.waterboards.ca.gov/>.

4. References

- U.S. Department of the Interior, National Park Service (NPS). 2020, August 17 (accessed). National Register of Historic Places. <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>.
- U.S. Fish and Wildlife Service (FWS). 2019. National Wetlands Inventory. August 17, 2020 (accessed). <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.
- US Environmental Protection Agency (USEPA). 2018. EJSCREEN. <https://ejscreen.epa.gov/mapper/>.
- . 2020. EnviroMapper for EnviroFacts. <https://www3.epa.gov/enviro/index.html>.

4. References

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Appendix A Air Quality & GHG Modeling Data

Appendix

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Air Quality and Greenhouse Gas Background and Modeling Data

AIR QUALITY

Climate/Meteorology

SOUTH COAST AIR BASIN

The project site lies in the South Coast Air Basin (SoCAB), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (South Coast AQMD 2005).

Temperature and Precipitation

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station nearest to the project site with temperature data is the Montebello, California Monitoring Station (ID No. 045790). The lowest average temperature is reported at 47.2°F in December, and the highest average temperature is 89.7°F in August (WRCC 2020).

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. Rainfall historically averages 14.78 inches per year in the project area (WRCC 2020).

Humidity

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog, especially along the coast, are frequent. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB (South Coast AQMD 2005).

Wind

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur, both in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the transport and diffusion of pollutants by inhibiting their eastward transport. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, there are two similarly distinct types of temperature inversions that control the vertical depth through which pollutants are mixed. These are the marine/subsidence inversion and the radiation inversion. The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the project area (South Coast AQMD 2005).

Air Quality Regulations

The proposed project has the potential to release gaseous emissions of criteria pollutants and dust into the ambient air; therefore, it falls under the ambient air quality standards promulgated at the local, state, and federal levels. The project site is in the SoCAB and is subject to the rules and regulations imposed by the South Coast Air Quality Management District (South Coast AQMD). However, South Coast AQMD reports to California Air Resources board (CARB), and all criteria emissions are also governed by the California and national Ambient Air Quality Standards (AAQS). Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized below.

AMBIENT AIR QUALITY STANDARDS

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve

and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS, based on even greater health and welfare concerns.

These National AAQS and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect “sensitive receptors” 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. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health based AAQS for seven air pollutants. As shown in Table 1, *Ambient Air Quality Standards for Criteria Pollutants*, these pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 1 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard ¹	Federal Primary Standard ²	Major Pollutant Sources
Ozone (O ₃) ³	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	*	0.030 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	0.14 ppm	
Respirable Coarse Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m ³	150 µg/m ³	
Respirable Fine Particulate Matter (PM _{2.5}) ⁴	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m ³	

Table 1 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard ¹	Federal Primary Standard ²	Major Pollutant Sources
Lead (Pb)	30-Day Average	1.5 µg/m ³	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m ³	
	Rolling 3-Month Average	*	0.15 µg/m ³	
Sulfates (SO ₄) ⁵	24 hours	25 µg/m ³	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H ₂ S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: CARB 2016.

Notes: ppm: parts per million; µg/m³: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1 California standards for O₃, CO (except 8-hour Lake Tahoe), SO₂ (1 and 24 hour), NO₂, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equalled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2 National standards (other than O₃, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O₃ standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

3 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

4 On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

5 On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

California has also adopted a host of other regulations that reduce criteria pollutant emissions, including:

- AB 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations (CCR): Appliance Energy Efficiency Standards
- Title 24, Part 6, CCR: Building and Energy Efficiency Standards
- Title 24, Part 11, CCR: Green Building Standards Code

CRITERIA AIR POLLUTANTS

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. Air pollutants are categorized as primary or secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb) are primary air pollutants. Of these, CO, SO₂, NO₂, PM₁₀, and PM_{2.5} are “criteria air pollutants,” which means that ambient air quality standards (AAQS) have been established for them. VOC and oxides of nitrogen (NO_x) are air pollutant precursors that form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O₃) and NO₂ are the principal secondary pollutants. A description of each of the primary and secondary criteria air pollutants and their known health effects is presented below.

Carbon Monoxide (CO) is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion, engines and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB. The highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005; USEPA 2019a). The SoCAB is designated under the California and National AAQS as being in attainment of CO criteria levels (CARB 2017a).

Volatile Organic Compounds (VOC) are compounds composed primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of VOCs include evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. There are no ambient air quality standards established for VOCs. However, because they contribute to the formation of ozone (O₃), South Coast AQMD has established a significance threshold for this pollutant (South Coast AQMD 2005).

Nitrogen Oxides (NO_x) are a byproduct of fuel combustion and contribute to the formation of O₃, PM₁₀, and PM_{2.5}. The two major forms of NO_x are nitric oxide (NO) and nitrogen dioxide (NO₂). The principal form of NO₂ produced by combustion is NO, but NO reacts with oxygen to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NO₂ is only potentially irritating. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase in bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 part per million (ppm). NO₂ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure (South Coast AQMD 2005; USEPA 2019a). The SoCAB is designated as an attainment area for NO₂ under the National AAQS California AAQS (CARB 2017a).

Sulfur Dioxide (SO₂) is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and from chemical processes at chemical plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO₂ (South Coast AQMD 2005; USEPA 2019a). When sulfur dioxide forms sulfates (SO₄) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_x). Thus, SO₂ is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO₂ may irritate the upper respiratory tract. At lower concentrations and when combined with particulates, SO₂ may do greater harm by injuring lung tissue. The SoCAB is designated as attainment under the California and National AAQS (CARB 2017a).

Suspended Particulate Matter (PM₁₀ and PM_{2.5}) consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM₁₀, include the particulate matter with an aerodynamic diameter of 10 microns (i.e., 10 millionths of a meter or 0.0004 inch) or less. Inhalable fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 microns (i.e., 2.5 millionths of a meter or 0.0001 inch) or less. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind action on arid landscapes also contributes substantially to local particulate loading (i.e., fugitive dust). Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems (South Coast AQMD 2005).

The US Environmental Protection Agency's (EPA) scientific review concluded that PM_{2.5}, which penetrates deeply into the lungs, is more likely than PM₁₀ to contribute to health effects and at concentrations that extend well below those allowed by the current PM₁₀ standards. These health effects include premature death and increased hospital admissions and emergency room visits (primarily the elderly and individuals with cardiopulmonary disease); increased respiratory symptoms and disease (children and individuals with cardiopulmonary disease such as asthma); decreased lung functions (particularly in children and individuals with asthma); and alterations in lung tissue and structure and in respiratory tract defense mechanisms (South Coast AQMD 2005). There has been emerging evidence that even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.1 millionths of a meter or <0.000004 inch), known as ultrafine particulates (UFPs), have human health implications, because UFPs toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2013). However, the EPA or CARB have yet to adopt AAQS to regulate these particulates. Diesel particulate matter (DPM) is classified by the CARB as a carcinogen (CARB 1998). Particulate matter can also cause environmental effects such as visibility impairment,¹ environmental damage,² and aesthetic damage³ (South Coast AQMD

¹ PM_{2.5} is the main cause of reduced visibility (haze) in parts of the United States.

² Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

³ Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

2005; USEPA 2019a). The SoCAB is a nonattainment area for PM_{2.5} under California and National AAQS and a nonattainment area for PM₁₀ under the California AAQS (CARB 2017a).⁴

Ozone (O₃) is commonly referred to as “smog” and is a gas that is formed when VOCs and NO_x, both by-products of internal combustion engine exhaust, undergo photochemical reactions in the presence of sunlight. O₃ is a secondary criteria air pollutant. O₃ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for the formation of this pollutant. O₃ poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O₃ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O₃ also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O₃ also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O₃ harms sensitive vegetation during the growing season (South Coast AQMD 2005; USEPA 2019a). The SoCAB is designated as extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2017a).

Lead (Pb) is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005; USEPA 2019a). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA’s regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the EPA and CARB adopted stricter lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.⁵ As a result of these violations, the Los Angeles County portion of the SoCAB is designated nonattainment under the National AAQS for lead (South Coast AQMD 2012; CARB 2017a). Because emissions of lead are found only in projects that are permitted by South Coast AQMD, lead is not a pollutant of concern for the project.

⁴ CARB approved the SCAQMD’s request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the National AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM₁₀ standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California’s request to redesignate the PM₁₀ nonattainment area to attainment of the PM₁₀ National AAQS, effective on July 26, 2013.

⁵ Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (SCAQMD 2012).

TOXIC AIR CONTAMINANTS

The public's exposure to air pollutants classified as toxic air contaminants (TACs) is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant (HAP) pursuant to Section 112(b) of the federal Clean Air Act (42 United States Code §7412[b]) is a toxic air contaminant. Under state law, the California Environmental Protection Agency (Cal/EPA), acting through CARB, is authorized to identify a substance as a TAC if it determines that the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology to minimize emissions. To date, CARB has established formal control measures for 11 TACs, all of which are identified as having no safe threshold.

Air toxics from stationary sources are also regulated in California under the Air Toxics "Hot Spot" Information and Assessment Act of 1987. Under AB 2588, toxic air contaminant emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines.

Diesel Particulate Matter

In 1998, CARB identified particulate emissions from diesel-fueled engines (diesel PM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

CARB has promulgated the following specific rules to limit TAC emissions:

- 13 CCR Chapter 10, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

- 13 CCR Chapter 10, Section 2480, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- 13 CCR Section 2477 and Article 8, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

Community Risk

In addition, to reduce exposure to TACs, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to provide guidance regarding 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. This guidance document was developed to assess compatibility and associated health risks when placing sensitive receptors near existing pollution sources. CARB's recommendations on the siting of new sensitive land uses were based on 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 proximity to air pollution sources substantially increases exposure and the potential for adverse health effects. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risks from motor vehicle traffic, DPM from trucks, and benzene and 1,3-butadiene from passenger vehicles. CARB recommendations are based on data that show that localized air pollution exposures can be reduced by as much as 80 percent by following CARB minimum distance separations.

Multiple Airborne Toxics Exposure Study (MATES)

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study on ambient concentrations of TACs and estimated the potential health risks from air toxics in the SoCAB. In 2008, South Coast AQMD conducted its third update to the MATES study (MATES III). The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,200 in a million. The largest contributor to this risk was diesel exhaust, accounting for 84 percent of the cancer risk (South Coast AQMD 2008b).

South Coast AQMD recently released the fourth update (MATES IV). The results showed that the overall monitored risk for excess cancer from a lifetime exposure to ambient levels of air toxics decreased to approximately 418 in one million. Compared to the 2008 MATES III, monitored excess cancer risks decreased by approximately 65 percent. Approximately 90 percent of the risk is attributed to mobile sources while 10 percent is attributed to TACs from stationary sources, such as refineries, metal processing facilities, gas stations, and chrome plating facilities. The largest contributor to this risk was diesel exhaust, accounting for approximately 68 percent of the air toxics risk. Compared to MATES III, MATES IV found substantial improvement in air quality and associated decrease in air toxics exposure. As a result, the estimated basin-wide population-weighted risk decreased by approximately 57 percent compared to the analysis done for the MATES III time period (South Coast AQMD 2015a).

The Office of Environmental Health Hazard Assessment (OEHHA) updated the guidelines for estimating cancer risks on March 6, 2015. The new method utilizes higher estimates of cancer potency during early life exposures, which result in a higher calculation of risk. There are also differences in the assumptions on

breathing rates and length of residential exposures. When combined together, South Coast AQMD estimates that risks for a given inhalation exposure level will be about 2.7 times higher using the proposed updated methods identified in MATES IV (e.g., 2.7 times higher than 418 in one million overall excess cancer risk) (South Coast AQMD 2015a).

Air Quality Management Planning

South Coast AQMD is the agency responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). Since 1979, a number of AQMPs have been prepared.

2016 AQMP

On March 3, 2017, South Coast AQMD adopted the 2016 AQMP as an update to the 2012 AQMP. The 2016 AQMP addresses strategies and measures to attain the following National AAQS:

- 2008 National 8-hour ozone standard by 2031,
- 2012 National annual PM_{2.5} standard by 2025⁶,
- 2006 National 24-hour PM_{2.5} standard by 2019,
- 1997 National 8-hour ozone standard by 2023, and the
- 1979 National 1-hour ozone standard by year 2022.

It is projected that total NO_x emissions in the SoCAB would need to be reduced to 150 tons per day (tpd) by year 2023 and to 100 tpd in year 2031 to meet the 1997 and 2008 federal 8-hour ozone standards. The strategy to meet the 1997 federal 8-hour ozone standard would also lead to attaining the 1979 federal 1-hour ozone standard by year 2022 (South Coast AQMD 2017), which requires reducing NO_x emissions in the SoCAB to 250 tpd. This is approximately 45 percent additional reductions above existing regulations for the 2023 ozone standard and 55 percent additional reductions above existing regulations to meet the 2031 ozone standard.

Reducing NO_x emissions would also reduce PM_{2.5} concentrations in the SoCAB. However, as the goal is to meet the 2012 federal annual PM_{2.5} standard no later than year 2025, South Coast AQMD is seeking to reclassify the SoCAB from “moderate” to “serious” nonattainment under this federal standard. A “moderate” nonattainment would require meeting the 2012 federal standard by no later than 2021.

Overall, the 2016 AQMP is composed of stationary and mobile-source emission reductions from regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile-source strategies, and reductions from federal sources such as aircrafts, locomotives, and ocean-going vessels. Strategies outlined in the 2016 AQMP would be implemented in collaboration between CARB and the EPA (South Coast AQMD 2017).

⁶ The 2016 AQMP requests a reclassification from moderate to serious non-attainment for the 2012 National PM_{2.5} standard.

LEAD STATE IMPLEMENTATION PLAN

In 2008 EPA designated the Los Angeles County portion of the SoCAB nonattainment under the federal lead (Pb) classification due to the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in Vernon and the City of Industry exceeding the new standard. The rest of the SoCAB, outside the Los Angeles County nonattainment area remains in attainment of the new standard. On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the EPA revised in 2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was submitted to EPA for approval.

AREA DESIGNATIONS

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the State Implementation Plan (SIP). Areas are classified as attainment or nonattainment areas for particular pollutants, depending on whether they meet ambient air quality standards. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- **Unclassified:** a pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- **Attainment:** a pollutant is in attainment if the CAAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment:** a pollutant is in nonattainment if there was at least one violation of a state AAQS for that pollutant in the area.
- **Nonattainment/Transitional:** a subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SoCAB is shown in Table 2, *Attainment Status of Criteria Pollutants in the South Coast Air Basin*. The SoCAB is designated in attainment of the California AAQS for sulfates. The SoCAB is designated as nonattainment for lead (Los Angeles County only) under the National AAQS.

Table 2 Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Extreme Nonattainment	No Federal Standard
Ozone – 8-hour	Extreme Nonattainment	Extreme Nonattainment
PM ₁₀	Serious Nonattainment	Attainment/Maintenance
PM _{2.5}	Nonattainment	Nonattainment ¹
CO	Attainment	Attainment
NO ₂	Attainment	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Attainment	Nonattainment (Los Angeles County only) ²
All others	Attainment/Unclassified	Attainment/Unclassified

Source: CARB 2017b.

¹ South Coast AQMD is seeking to reclassify the SoCAB from “moderate” to “serious” nonattainment under federal PM_{2.5} standard.

² In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new federal and existing state AAQS as a result of large industrial emitters. Remaining areas in the SoCAB are unclassified.

Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project site are best documented by measurements taken by the South Coast AQMD. The project site is located within Source Receptor Area (SRA) 11 – South San Gabriel Valley. The air quality monitoring station within SRA 11 closest to the project site is the Pico Rivera-4144 San Gabriel Monitoring Station. This station monitors O₃ and NO₂ and PM_{2.5}. Data for PM₁₀ is supplemented by the Azusa Monitoring Station. The most current five years of data from these monitoring stations are included in Table 3, *Ambient Air Quality Monitoring Summary*. The data show regular violations of the state and federal O₃, the state PM₁₀, and federal PM_{2.5} standards in the last five years.

Table 3 Ambient Air Quality Monitoring Summary

Pollutant/Standard	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2014	2015	2016	2017	2018
Ozone (O₃)^a					
State 1-Hour ≥ 0.09 ppm (days exceed threshold)	7	6	9	7	3
State 8-hour ≥ 0.07 ppm (days exceed threshold)	7	11	6	9	5
Federal 8-Hour > 0.075 ppm (days exceed threshold)	5	2	2	4	2
Max. 1-Hour Conc. (ppm)	0.123	0.136	0.127	0.147	0.112
Max. 8-Hour Conc. (ppm)	0.092	0.081	0.081	0.086	0.082
Nitrogen Dioxide (NO₂)^a					
State 1-Hour ≥ 0.18 ppm (days exceed threshold)	0	0	0	0	0
Federal 1-Hour ≥ 0.100 ppm (days exceed threshold)	0	0	0	0	0
Max. 1-Hour Conc. (ppb)	0.0867	0.0704	0.0632	0.0750	0.0768
Coarse Particulates (PM₁₀)^b					
State 24-Hour > 50 µg/m ³ (days exceed threshold)	21	12	12	7	10
Federal 24-Hour > 150 µg/m ³ (days exceed threshold)	0	0	0	0	0
Max. 24-Hour Conc. (µg/m ³)	96.0	101.0	74.0	83.9	78.3
Fine Particulates (PM_{2.5})^a					
Federal 24-Hour > 35 µg/m ³ (days exceed threshold)	0	3	2	1	2
Max. 24-Hour Conc. (µg/m ³)	35.1	52.7	46.5	49.5	56.3

Source: CARB 2020.

ppm: parts per million; parts per billion, µg/m³: micrograms per cubic meter

Notes:

^a Data obtained from the Pico Rivera-4144 San Gabriel Monitoring Station.

^b Data obtained from the Azusa Monitoring Station.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases.

Residential areas are also considered to be sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public. The nearest sensitive receptors to the proposed project site are the adjacent homes to the northwest of the project site.

Methodology

Projected construction-related air pollutant emissions are calculated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2.25. CalEEMod compiles an emissions inventory of construction (fugitive dust, off-gas emissions, on-road emissions, and off-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal (annual only), and indirect emissions from water/wastewater (annual only) use. The calculated emissions of the project are compared to thresholds of significance for individual projects using the South Coast AQMD's CEQA Air Quality Analysis Guidance Handbook.

Thresholds of Significance

The analysis of the proposed project's air quality impacts follows the guidance and methodologies recommended in South Coast AQMD's *CEQA Air Quality Handbook* and the significance thresholds on South Coast AQMD's website (South Coast AQMD 1993).⁷ CEQA allows the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. South Coast AQMD has established thresholds of significance for regional air quality emissions for construction activities and project operation. In addition to the daily thresholds listed above, projects are also subject to the AAQS. These are addressed through an analysis of localized CO impacts and localized significance thresholds (LSTs).

REGIONAL SIGNIFICANCE THRESHOLDS

South Coast AQMD has adopted regional construction and operational emissions thresholds to determine a project's cumulative impact on air quality in the SoCAB. Table 4, *South Coast AQMD Significance Thresholds*, lists South Coast AQMD's regional significance thresholds that are applicable for all projects uniformly regardless of size or scope. There is growing evidence that although ultrafine particulates contribute a very small portion of the overall atmospheric mass concentration, they represent a greater proportion of the health risk from PM. However, the EPA or CARB have not yet adopted AAQS to regulate ultrafine particulates; therefore, South Coast AQMD has not developed thresholds for them.

Table 4 South Coast AQMD Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Reactive Organic Gases (ROGs)/ Volatile Organic Compounds (VOCs)	75 lbs/day	55 lbs/day
Nitrogen Oxides (NO _x)	100 lbs/day	55 lbs/day
Carbon Monoxide (CO)	550 lbs/day	550 lbs/day
Sulfur Oxides (SO _x)	150 lbs/day	150 lbs/day
Particulates (PM ₁₀)	150 lbs/day	150 lbs/day
Particulates (PM _{2.5})	55 lbs/day	55 lbs/day

Source: South Coast AQMD 2019.

⁷ SCAQMD's Air Quality Significance Thresholds are current as of March 2015 and can be found here: <http://www.aqmd.gov/ceqa/hdbk.html>.

Projects that exceed the regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

- Linked to increased cancer risk (PM_{2.5}, TACs)
- Aggravates respiratory disease (O₃, PM_{2.5})
- Increases bronchitis (O₃, PM_{2.5})
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath (O₃)
- Reduces resistance to infections and increases fatigue (O₃)
- Reduces lung growth in children (PM_{2.5})
- Contributes to heart disease and heart attacks (PM_{2.5})
- Contributes to premature death (O₃, PM_{2.5})
- Linked to lower birth weight in newborns (PM_{2.5}) (South Coast AQMD 2015b)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of PM_{2.5} is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists responsible for a landmark children's health study found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015c).

Mass emissions in Table 4 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SoCAB. Therefore, regional emissions from a single project do not single-handedly trigger a regional health impact. South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SoCAB. To achieve the health-based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS.

CO HOTSPOTS

Areas of vehicle congestion have the potential to create pockets of CO called hot spots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 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. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SoCAB and in the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hot spot analysis conducted for the attainment by South Coast AQMD for busiest intersections in Los

Angeles during the peak morning and afternoon periods plan did not predict a violation of CO standards.⁸ As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in previous years, prior to redesignation, were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection. 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 air does not mix—in order to generate a significant CO impact (BAAQMD 2017).

LOCALIZED SIGNIFICANCE THRESHOLDS

South Coast AQMD developed LSTs for emissions of NO₂, CO, PM₁₀, and PM_{2.5} generated at the project site (offsite mobile-source emissions are not included in the LST analysis). LSTs represent the maximum emissions at a project site that are not expected to cause or contribute to an exceedance of the most stringent federal or state AAQS and are shown in Table 5, *South Coast AQMD Localized Significance Thresholds*.

Table 5 South Coast AQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO ₂ Standard (CAAQS)	0.18 ppm
Annual NO ₂ Standard (CAAQS)	0.03 ppm
24-Hour PM ₁₀ Standard – Construction (South Coast AQMD) ¹	10.4 µg/m ³
24-Hour PM _{2.5} Standard – Construction (South Coast AQMD) ¹	10.4 µg/m ³
24-Hour PM ₁₀ Standard – Operation (South Coast AQMD) ¹	2.5 µg/m ³
24-Hour PM _{2.5} Standard – Operation (South Coast AQMD) ¹	2.5 µg/m ³

Source: South Coast AQMD 2019.

ppm – parts per million; µg/m³ – micrograms per cubic meter

¹ Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for PM₁₀ and PM_{2.5}, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

To assist lead agencies, South Coast AQMD developed screening-level LSTs to back-calculate the mass amount (lbs. per day) of emissions generated onsite that would trigger the levels shown in Table 5 for projects under 5-acres. These “screening-level” LSTs tables are the localized significance thresholds for all projects of five acres and less; however, it can be used as screening criteria for larger projects to determine whether or not dispersion modeling may be required to compare concentrations of air pollutants generated by the project to the localized concentrations shown in Table 5.

In accordance with South Coast AQMD’s LST methodology, construction LSTs are based on the acreage disturbed per day based on equipment use. The construction LSTs for the project site in SRA 11 are shown in

⁸ The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

Table 6, *South Coast AQMD Screening-Level Construction Localized Significance Thresholds*, sensitive receptors within 82 feet (25 meters).

Table 6 South Coast AQMD Screening-Level Construction Localized Significance Thresholds

Acreage Disturbed	Threshold (lbs/day)			
	Nitrogen Oxides (NO _x)	Carbon Monoxide (CO)	Coarse Particulates (PM ₁₀)	Fine Particulates (PM _{2.5})
≤1.00 Acre Disturbed Per Day	83	673	5.00	4.00
1.35-Acres Disturbed Per Day	96	798	5.70	4.35

Source: South Coast AQMD 2008a and 2011. Based on receptors within 25 meters (82 feet) in SRA 11.

Because the project is not an industrial project that has the potential to emit substantial sources of stationary emissions, operational LSTs are not an air quality impact of concern associated with the project.

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB’s air toxics list pursuant to AB 1807, or placed on the EPA’s National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 7, *Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for operation of a project. The purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project. (*California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369 (Case No. S213478)*). CEQA does not require CEQA-level environmental document to analyze the environmental effects of attracting development and people to an area. However, the environmental document must analyze the impacts of environmental hazards on future users, when a proposed project exacerbates an existing environmental hazard or condition. Residential, commercial, and office uses do not use substantial quantities of TACs and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects.

Table 7 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds

Maximum Incremental Cancer Risk	≥ 10 in 1 million
Hazard Index (project increment)	≥ 1.0
Cancer Burden in areas ≥ 1 in 1 million	> 0.5 excess cancer cases

Source: South Coast AQMD 2019.

GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. Climate change is the variation of Earth’s climate over time, whether due to natural variability or as a result of human activities. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major

GHG—water vapor,⁹ carbon (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).¹⁰ The major GHG are briefly described below.

- **Carbon dioxide (CO₂)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g. manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH₄)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities.
- **Nitrous oxide (N₂O)** is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.
- **Fluorinated gases** are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as high global-warming-potential (GWP) gases.
 - **Chlorofluorocarbons (CFCs)** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere where, given suitable conditions, they break down ozone. These gases are also ozone-depleting gases and are therefore being replaced by other compounds that are GHGs covered under the Kyoto Protocol.
 - **Perfluorocarbons (PFCs)** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [CF₄] and perfluoroethane [C₂F₆]) were introduced as alternatives, along with HFCs, to the ozone-depleting substances. In addition, PFCs are

⁹ Water vapor (H₂O) 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.

¹⁰ 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 particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. 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.

emitted as by-products of industrial processes and are used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high global warming potential.

- ***Sulfur Hexafluoride (SF₆)*** is a colorless gas soluble in alcohol and ether, slightly soluble in water. SF₆ is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.
- ***Hydrochlorofluorocarbons (HCFCs)*** contain hydrogen, fluorine, chlorine, and carbon atoms. Although ozone-depleting substances, they are less potent at destroying stratospheric ozone than CFCs. They have been introduced as temporary replacements for CFCs and are also GHGs.
- ***Hydrofluorocarbons (HFCs)*** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs (IPCC 2001; USEPA 2019b).

GHGs are dependent on the lifetime or persistence of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 8. The GWP is used to convert GHGs to CO₂-equivalence (CO₂e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fifth Assessment Report (AR5) GWP values for CH₄, a project that generates 10 MT of CH₄ would be equivalent to 280 MT of CO₂.¹¹

¹¹ CO₂-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

Table 8 GHG Emissions and Their Relative Global Warming Potential Compared to CO₂

GHGs	Carbon Dioxide (CO ₂)	Methane ¹ (CH ₄)	Nitrous Oxide (N ₂ O)
Second Assessment			
Atmospheric Lifetime (Years)	50 to 200	12 (±3)	120
Global Warming Potential Relative to CO ₂ ²	1	21	310
Fourth Assessment			
Atmospheric Lifetime (Years)	50 to 200	12	114
Global Warming Potential Relative to CO ₂ ²	1	25	298
Fifth Assessment³			
Atmospheric Lifetime (Years)	50 to 200	12	121
Global Warming Potential Relative to CO ₂ ²	1	28	265

Source: Intergovernmental Panel on Climate Change (IPCC). 1995. Second Assessment Report: Climate Change 1995 https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_sar_wg_1_full_report.pdf; Intergovernmental Panel on Climate Change (IPCC). 2007. Fourth Assessment Report: Climate Change 2007. New York: Cambridge University Press. https://www.ipcc.ch/site/assets/uploads/2018/02/ar4_syr_full_report.pdf; Intergovernmental Panel on Climate Change (IPCC). 2013. Fifth Assessment Report: Climate Change 2013. New York: Cambridge University Press.

Notes:

- ¹ The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.
- ² Based on 100-year time horizon of the GWP of the air pollutant compared to CO₂.
- ³ The GWP values in the IPCC's Fifth Assessment Report (2013)¹² reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO₂. However, South Coast AQMD uses the AR4 GWP values to maintain consistency in statewide GHG emissions modeling. In addition, the 2017 Scoping Plan Update was based on the AR4 GWP values.

California's Greenhouse Gas Sources and Relative Contribution

In 2019, the statewide GHG emissions inventory was updated for 2000 to 2017 emissions using the GWPs in IPCC's AR4.¹³ Based on these GWPs, California produced 424.10 MMTCO₂e GHG emissions in 2017. California's transportation sector was the single largest generator of GHG emissions, producing 40.1 percent of the state's total emissions. Industrial sector emissions made up 21.1 percent, and electric power generation made up 14.7 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (9.7 percent), agriculture and forestry (7.6 percent) high GWP (4.7 percent), and recycling and waste (2.1 percent) (CARB 2019a).

California's GHG emissions have followed a declining trend since 2007. In 2017, emissions from routine GHG emitting activities statewide were 424 MMTCO₂e, 5 MMTCO₂e lower than 2016 levels. This represents an overall decrease of 14 percent since peak levels in 2004 and 7 MMTCO₂e below the 1990 level and the state's 2020 GHG target. During the 2000 to 2017 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 14.0 MTCO₂e per capita to 10.7 MTCO₂e per capita in 2017, a 24 percent decrease. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product (GDP)) is declining, representing a 41 percent decline since the 2001 peak, while the state's GDP has grown 52 percent during this period. For the

¹² Intergovernmental Panel on Climate Change (IPCC). 2013. Fifth Assessment Report: Climate Change 2013. New York: Cambridge University Press. https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf.

¹³ Methodology for determining the statewide GHG inventory is not the same as the methodology used to determine statewide GHG emissions under Assembly Bill 32 (2006).

first time since California started to track GHG emissions, California uses more electricity from zero-GHG sources (hydro, solar, wind, and nuclear energy) (CARB 2019b).

Regulatory Settings

REGULATION OF GHG EMISSIONS ON A NATIONAL LEVEL

The US Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not in and of themselves impose any emission reduction requirements but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009).

To regulate GHGs from passenger vehicles, EPA was required to issue an endangerment finding. The finding identifies emissions of six key GHGs—CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the project's GHG emissions inventory because they constitute the majority of GHG emissions and, per South Coast AQMD guidance, are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

US Mandatory Report Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MT or more of CO₂ per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2021 to 2026)

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon in 2025. However, on March 30, 2020, the EPA finalized an updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards, covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021-2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards established in 2012. However, consortium of automakers and California have agreed on a voluntary framework to reduce emissions that can serve as an alternative path forward for clean vehicle standards nationwide. Automakers who agreed to the framework are Ford, Honda, BMW of North America, and Volkswagen Group of America. The framework supports continued annual reductions of vehicle greenhouse gas emissions through the 2026 model year, encourages innovation to accelerate the transition to electric vehicles, and provides industry the certainty needed to make investments and create jobs. This commitment means that the auto companies party to the voluntary agreement will only sell cars in the United States that meet the CAFE standards established in 2021 for model years 2017 to 2025 (CARB 2019c).

EPA Regulation of Stationary Sources under the Clean Air Act (Ongoing)

Pursuant to its authority under the Clean Air Act, the EPA has been developing regulations for new, large, stationary sources of emissions, such as power plants and refineries. Under former President Obama's 2013 Climate Action Plan, the EPA was directed to develop regulations for existing stationary sources as well. On June 19, 2019, the EPA issued the final Affordable Clean Energy (ACE) rule which became effective on August 19, 2019. The ACE rule was crafted under the direction of President Trump's Energy Independence Executive Order. It officially rescinds the Clean Power Plan rule issued during the Obama Administration and sets emissions guidelines for states in developing plans to limit CO₂ emissions from coal-fired power plants.

REGULATION OF GHG EMISSIONS ON A STATE LEVEL

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32) and Senate Bill 375 (SB 375).

Executive Order S-3-05

Executive Order S-3-05, signed June 1, 2005. Executive Order S-3-05 set the following GHG reduction targets for the State:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

State of California guidance and targets for reductions in GHG emissions are generally embodied in the Global Warming Solutions Act, adopted with passage of AB 32. AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 emissions reduction goal established in Executive Order S-03-05.

CARB 2008 Scoping Plan

The final Scoping Plan was adopted by CARB on December 11, 2008. The *2008 Scoping Plan* identified that GHG emissions in California are anticipated to be approximately 596 MMTCO_{2e} in 2020. In December 2007, CARB approved a 2020 emissions limit of 427 MMTCO_{2e} (471 million tons) for the state (CARB 2008). In order to effectively implement the emissions cap, AB 32 directed CARB to establish a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 MTCO_{2e} per year, prepare a plan demonstrating how the 2020 deadline can be met, and develop appropriate regulations and programs to implement the plan by 2012.

First Update to the Scoping Plan

CARB completed a five-year update to the 2008 Scoping Plan, as required by AB 32. The First Update to the Scoping Plan was adopted at the May 22, 2014, board hearing. The update highlights California's progress

toward meeting the near-term 2020 GHG emission reduction goals defined in the original 2008 Scoping Plan. As part of the update, CARB recalculated the 1990 GHG emission levels with the updated AR4 GWPs, and the 427 MMTCO_{2e} 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, is slightly higher at 431 MMTCO_{2e} (CARB 2014).

As identified in the Update to the Scoping Plan, California is on track to meeting the goals of AB 32. However, the update also addresses the state's longer-term GHG goals within a post-2020 element. The post-2020 element provides a high-level view of a long-term strategy for meeting the 2050 GHG goals, including a recommendation for the state to adopt a midterm target. According to the Update to the Scoping Plan, local government reduction targets should chart a reduction trajectory that is consistent with or exceeds the trajectory created by statewide goals (CARB 2014). CARB identified that reducing emissions to 80 percent below 1990 levels will require a fundamental shift to efficient, clean energy in every sector of the economy. Progressing toward California's 2050 climate targets will require significant acceleration of GHG reduction rates. Emissions from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit (CARB 2014).

Executive Order B-30-15

Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in Executive Order S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaptation strategy, Safeguarding California, in order to ensure climate change is accounted for in state planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed SB 32 and AB 197 into law, making the Executive Order goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

2017 Climate Change Scoping Plan Update

Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 24, 2017, CARB adopted the 2017 Climate Change Scoping Plan Update, which outlines potential regulations and programs, including strategies consistent with AB 197 requirements, to achieve the 2030 target. The 2017 Scoping Plan establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 (CARB 2017c).

California's climate strategy will require contributions from all sectors of the economy, including enhanced focus on zero- and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, such as solar roofs, wind, and other types of distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use

planning, to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for GHG reductions at stationary sources complement local air pollution control efforts by the local air districts to tighten criteria air pollutants and TACs emissions limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks;
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030).
- Implementation of SB 350, which expands the Renewables Portfolio Standard (RPS) to 50 percent RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- Continued implementation of SB 375.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

In addition to the statewide strategies listed above, the 2017 Climate Change Scoping Plan also identified local governments as essential partners in achieving the State's long-term GHG reduction goals and identified local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends statewide targets of no more than 6 MTCO_{2e} or less per capita by 2030 and 2 MTCO_{2e} or less per capita by 2050. CARB recommends that local governments evaluate and adopt robust and quantitative locally-appropriate goals that align with the statewide per capita targets and the State's sustainable development objectives and develop plans to achieve the local goals. The statewide per capita goals were developed by applying the percent reductions necessary to reach the 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) to the State's 1990 emissions limit established under AB 32. For CEQA projects, CARB states that lead agencies have discretion to develop evidenced-based numeric thresholds (mass emissions, per capita, or per service population)—consistent with the Scoping Plan and the state's long-term GHG goals. To the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from VMT, and direct investments in GHG reductions within the project's region that contribute potential air quality, health, and economic co-benefits. Where further project design or regional investments are infeasible or not proven to be effective, CARB recommends mitigating potential GHG impacts through purchasing and retiring carbon credits.

The Scoping Plan scenario is set against what is called the business-as-usual (BAU) yardstick—that is, what would the GHG emissions look like if the State did nothing at all beyond the existing policies that are required and already in place to achieve the 2020 limit, as shown in Table 9, *2017 Climate Change Scoping Plan Emissions Reductions Gap*. It includes the existing renewables requirements, advanced clean cars, the “10 percent” Low Carbon Fuel Standard (LCFS), and the SB 375 program for more vibrant communities, among others. However, it does not include a range of new policies or measures that have been developed or put into statute over the past two years. Also shown in the table, the known commitments are expected to result in emissions that are 60 MMTCO₂e above the target in 2030. If the estimated GHG reductions from the known commitments are not realized due to delays in implementation or technology deployment, the post-2020 Cap-and-Trade Program would deliver the additional GHG reductions in the sectors it covers to ensure the 2030 target is achieved.

Table 9 2017 Climate Change Scoping Plan Emissions Reductions Gap

Modeling Scenario	2030 GHG Emissions MMTCO ₂ e
Reference Scenario (Business-as-Usual)	389
With Known Commitments	320
2030 GHG Target	260
Gap to 2030 Target	60

Source: CARB 2017c.

Table 10, *2017 Climate Change Scoping Plan Emissions Change by Sector*, provides estimated GHG emissions by sector, compared to 1990 levels, and the range of GHG emissions for each sector estimated for 2030.

Table 10 2017 Climate Change Scoping Plan Emissions Change by Sector

Scoping Plan Sector	1990 MMTCO _{2e}	2030 Proposed Plan Ranges MMTCO _{2e}	% Change from 1990
Agricultural	26	24-25	-8% to -4%
Residential and Commercial	44	38-40	-14% to -9%
Electric Power	108	30-53	-72% to -51%
High GWP	3	8-11	267% to 367%
Industrial	98	83-90	-15% to -8%
Recycling and Waste	7	8-9	14% to 29%
Transportation (including TCU)	152	103-111	-32% to -27%
Net Sink ¹	-7	TBD	TBD
Sub Total	431	294-339	-32% to -21%
Cap-and-Trade Program	NA	24-79	NA
Total	431	260	-40%

Source: CARB 2017c.

Notes: TCU = Transportation, Communications, and Utilities; TBD: To Be Determined.

¹ Work is underway through 2017 to estimate the range of potential sequestration benefits from the natural and working lands sector.

Senate Bill 1383

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and CH₄. Black carbon is the light-absorbing component of fine particulate matter produced during incomplete combustion of fuels. SB 1383 requires the state board, no later than January 1, 2018, to approve and begin implementing that comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030, as specified. The bill also establishes targets for reducing organic waste in landfill. On March 14, 2017, CARB adopted the “Final Proposed Short-Lived Climate Pollutant Reduction Strategy,” which identifies the state’s approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s despite the tripling of diesel fuel use (CARB 2017b). In-use on-road rules are expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020. South Coast AQMD is one of the air districts that requires air pollution control technologies for chain-driven broilers, which reduces particulate emissions from these charbroilers by over 80 percent (CARB 2017b). Additionally, South Coast AQMD Rule 445 limits installation of new fireplaces in the SoCAB.

Senate Bill 375

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle

trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. SCAG's targets are an 8 percent per capita reduction from 2005 GHG emission levels by 2020 and a 13 percent per capita reduction from 2005 GHG emission levels by 2035 (CARB 2010). The 2020 targets are smaller than the 2035 targets because a significant portion of the built environment in 2020 has been defined by decisions that have already been made. In general, the 2020 scenarios reflect that more time is needed for large land use and transportation infrastructure changes. Most of the reductions in the interim are anticipated to come from improving the efficiency of the region's transportation network. The targets would result in 3 MMTCO_{2e} of reductions by 2020 and 15 MMTCO_{2e} of reductions by 2035. Based on these reductions, the passenger vehicle target in CARB's Scoping Plan (for AB 32) would be met (CARB 2010).

2017 Update to the SB 375 Targets

CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology and recently released another update in February 2018. The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update, while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks relative to 2005. This excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies such as statewide road user pricing. The proposed targets call for greater per capita GHG emission reductions from SB 375 than are currently in place, which for 2035, translate into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. As proposed, CARB staff's proposed targets would result in an additional reduction of over 8 MMTCO_{2e} in 2035 compared to the current targets. For the next round of SCS updates, CARB's updated targets for the SCAG region are an 8 percent per capita GHG reduction in 2020 from 2005 levels (unchanged from the 2010 target) and a 19 percent per capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (CARB 2018). CARB adopted the updated targets and methodology on March 22, 2018. All SCSs adopted after October 1, 2018 are subject to these new targets.

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan. For the SCAG region, the 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) was adopted on April 7, 2016, and is an update to the 2012 RTP/SCS (SCAG 2016). SCAG released the draft 2020-2045 RTP/SCS (Connect SoCal); adopted the plan for the limited purpose of transportation

conformity on May 7, 2020; and will consider the plan in 120 days (SCAG 2020).¹⁴ In general, the SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through horizon year 2045 (SCAG 2020).¹⁵ Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. Additionally, Connect SoCal also forecasts that implementation of the plan will reduce VMT per capita in year 2045 by 4.1 percent compared to baseline conditions for that year. Connect SoCal includes a “Core Vision” that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together and increasing investments in transit and complete streets.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards under *Federal Laws*, above). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California’s Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

Executive Order S-01-07

On January 18, 2007, the state set a new LCFS for transportation fuels sold in the state. Executive Order S-01-07 sets a declining standard for GHG emissions measured in carbon dioxide equivalent gram per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California’s transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applies to refiners, blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the “fuel cycle” using the most economically feasible methods.

¹⁴ 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>

¹⁵ 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>

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

A major component of California's Renewable Energy Program is the RPS established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects, because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

Senate Bill 350 (de Leon), was signed into law in September 2015. SB 350 establishes tiered increases to the RPS of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirement of 45 percent renewable energy by 2027 with the requirement of 50 percent by 2026 and also raises California's RPS requirements for 2050 from 50 percent to 60 percent. SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Furthermore, the bill also establishes an overall 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 the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18

Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Executive Order B-16-2012

On March 23, 2012, the state identified that CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). The

executive order also directs the number of zero-emission vehicles in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are zero-emission by 2015 and at least 25 percent by 2020. The executive order also establishes a target for the transportation sector of reducing GHG emissions from the transportation sector 80 percent below 1990 levels.

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2019 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Building Energy Efficiency Standards, which were adopted on May 9, 2018, went into effect on January 1, 2020.

The 2019 standards move towards cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of 3 stories and less. Four key areas the 2019 standards will focus on include 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements.¹⁶ Under the 2019 standards, nonresidential buildings and multifamily residential buildings of four stories or more will be 30 percent more energy efficient compared to the 2016 standards while single-family homes will be 7 percent more energy efficient.¹⁷ When accounting for the electricity generated by the solar photovoltaic system, single-family homes would use 53 percent less energy compared to homes built to the 2016 standards (CEC 2018b).

California Building Code: CALGreen

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.¹⁸ The mandatory provisions of CALGreen became effective January 1, 2011. The CEC adopted the voluntary standards of the 2019 CALGreen on October 3, 2018. The 2019 CALGreen standards became effective January 1, 2020.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the CEC on October 11, 2006 and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these

¹⁶ California Energy Commission (CEC). 2018. News Release: Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation. http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopted_nr.html.

¹⁷ California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.

¹⁸ The green building standards became mandatory in the 2010 edition of the code.

regulations are now often viewed as “business as usual,” they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Regulations

California’s Integrated Waste Management Act of 1989 (AB 939; Public Resources Code §§ 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses.

The California Solid Waste Reuse and Recycling Access Act (AB 1327; Public Resources Code §§ 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Section 5.408 of the 2016 and 2019 CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

In October of 2014 Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Water Efficiency Regulations

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed “SBX7-7.” SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by

regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Thresholds of Significance

The CEQA Guidelines recommend that a lead agency consider the following when assessing the significance of impacts from GHG emissions on the environment:

1. The extent to which the project may increase (or reduce) GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;
3. The extent to which the project complies with regulations or requirements adopted to implement an adopted statewide, regional, or local plan for the reduction or mitigation of GHG emissions.¹⁹

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast AQMD has convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting (Meeting No. 15) held in September 2010, South Coast AQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010):

- **Tier 1.** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level threshold, project-level and cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, South Coast AQMD requires an assessment of GHG emissions. South Coast AQMD is proposing a screening-level threshold of 3,000 MTCO_{2e} annually for all land use types or the following land-use-specific thresholds: 1,400 MTCO_{2e} for commercial projects, 3,500 MTCO_{2e} for residential projects, or 3,000

¹⁹ The Governor's Office of Planning and Research recommendations include a requirement that such a plan must be adopted through a public review process and include specific requirements that reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable, notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

MTCO_{2e} for mixed-use projects. These bright-line thresholds are based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions:

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.

The South Coast AQMD Working Group has identified an efficiency target for projects that exceed the screening threshold of 4.8 MTCO_{2e} per year per service population (MTCO_{2e}/year/SP) for project-level analyses and 6.6 MTCO_{2e}/year/SP for plan level projects (e.g., program-level projects such as general plans) for the year 2020.²⁰ The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.

For purposes of this analysis, because the proposed project has an anticipated opening year post-2020 (year 2021), the bright-line screening-level criterion of 3,000 MTCO_{2e}/yr is used as the significance threshold for this project. Therefore, if the project operation-phase emissions exceed the 3,000 MTCO_{2e}/yr threshold, GHG emissions would be considered potentially significant in the absence of mitigation measures.

²⁰ It should be noted that the Working Group also considered efficiency targets for 2035 for the first time in this Working Group meeting.

BIBLIOGRAPHY

- 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. 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). 1998, April 22. The Report on Diesel Exhaust. <http://www.arb.ca.gov/toxics/dieseltac/de-fnds.htm>.
- . 1999. California Air Resources Board (CARB). Final Staff Report: Update to the Toxic Air Contaminant List.
- . 2005, April. Air Quality and Land Use Handbook: A Community Health Perspective. <https://www.arb.ca.gov/ch/handbook.pdf>.
- . 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.
- . 2010, August. Staff Report Proposed Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.
- . 2014, May 15. First Update to the Climate Change Scoping Plan: Building on the Framework, Pursuant to AB 32, The California Global Warming Solutions Act of 2006. <http://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm>.
- . 2016, October 1. Ambient Air Quality Standards. <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>.
- . 2017a, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.
- . 2017b, May 5. 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.
- . 2018, February. Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf.
- . 2019a, August 26. 2019 Edition California Greenhouse Gas Inventory for 2000-2017: By Category as Defined in the 2008 Scoping Plan. <https://www.arb.ca.gov/cc/inventory/data/data.htm>.

- . 2019b, August 26. California Greenhouse Emissions for 2000 to 2017: Trends of Emissions and Other Indicators. <https://www.arb.ca.gov/cc/inventory/data/data.htm>.
- . 2019c, September 5 (accessed). California and major automakers reach groundbreaking framework agreement on clean emission standards. Accessed September 5, 2019. <https://ww2.arb.ca.gov/news/california-and-major-automakers-reach-groundbreaking-framework-agreement-clean-emission>.
- . 2020, February 6 (accessed). Air Pollution Data Monitoring Cards (2014, 2015, 2016, 2017, and 2018). <http://www.arb.ca.gov/adam/topfour/topfour1.php>.
- California Energy Commission (CEC). 2015a, June 10. 2016 Building Energy Efficiency Standards, Adoption Hearing Presentation. <http://www.energy.ca.gov/title24/2016standards/rulemaking/documents>.
- . 2015b. 2016 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2016_Building_Energy_Efficiency_Standards_FAQ.pdf.
- . 2018a. News Release: Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation. http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopted_nr.html.
- . 2018b. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.
- Intergovernmental Panel on Climate Change (IPCC). 1995. Second Assessment Report: Climate Change 1995. https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_sar_wg_I_full_report.pdf.
- . 2001. Third Assessment Report: Climate Change 2001. New York: Cambridge University Press. https://www.ipcc.ch/site/assets/uploads/2018/03/WGI_TAR_full_report.pdf.
- . 2007. Fourth Assessment Report: Climate Change 2007. New York: Cambridge University Press. https://www.ipcc.ch/site/assets/uploads/2018/02/ar4_syr_full_report.pdf.
- . 2013. Fifth Assessment Report: Climate Change 2013. New York: Cambridge University Press. https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf.
- South Coast Air Quality Management District (South Coast AQMD). 1993. California Environmental Quality Act Air Quality Handbook.
- . 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.
- . 2008a, July. Final Localized Significance Threshold Methodology.

- . 2008b, September. Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES III). <https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iii>.
- . 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>.
- . 2010, September 28. Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting 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-main-presentation.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf).
- . 2012, May 4. Final 2012 Lead State Implementation Plan: Los Angeles County. <http://www3.aqmd.gov/hb/attachments/2011-2015/2012May/2012-May4-030.pdf>.
- . 2013, February. 2012 Final Air Quality Management Plan. [https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/main-document-final-2012.pdf](https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/main-document-final-2012.pdf).
- . 2015a, October 3. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV). <https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv>.
- . 2015b. Health Effects of Air Pollution. <http://www.aqmd.gov/docs/default-source/publications/brochures/the-health-effects-of-air-pollution-brochure.pdf>.
- . 2015c, October. “Blueprint for Clean Air: 2016 AQMP White Paper.” 2016 AQMP White Papers Web Page. <https://www.aqmd.gov/nav/about/groups-committees/aqmp-advisory-group/2016-aqmp-white-papers/Blueprint>.
- . 2017, March 4. Final 2016 Air Quality Management Plan. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.
- . 2019, April (revised). South Coast AQMD Air Quality Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.
- Southern California Association of Governments (SCAG). 2016, April. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>.
- . 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.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>

- US Environmental Protection Agency (USEPA). 2009, December. EPA: Greenhouse Gases Threaten Public Health and the Environment. Science overwhelmingly shows greenhouse gas concentrations at unprecedented levels due to human activity.
https://archive.epa.gov/epapages/newsroom_archive/newsreleases/08d11a451131bca585257685005bf252.html.
- . 2019a, September 24 (accessed). Criteria Air Pollutants. <https://www.epa.gov/criteria-air-pollutants>.
- . 2019b, October 3 (accessed). Overview of Greenhouse Gases. Accessed on October 3, 2019.
<http://www3.epa.gov/climatechange/ghgemissions/gases.html>.
- Western Regional Climate Center (WRCC). 2020, February 3 (accessed). Montebello, California ([Station ID] 045790): Period of Record Monthly Climate Summary, 01/01/1979 to 02/26/2011. Western U.S. Climate Summaries. <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca5790>.

CalEEMod Inputs - 15252 East Valley Boulevard Auto Towing Yard

Name: 15252 East Valley Boulevard Auto Towing Yard
Project Number: IND-22.3
Project Location: 15252 East Valley Boulevard
County/Air Basin: Los Angeles County, South Coast Air Basin (SoCAB)
Climate Zone: 9
Land Use Setting: Urban
Operational Year: 2021
Utility Company: Southern California Edison
Air Basin: SoCAB
Air District: SCAQMD
SRA: 11

Project Site Acreage	1.80
Disturbed Site Acreage	1.35

Project Components				
Existing	SQFT	ACRES		
Buildings	8,537	0.20		
Broken Concrete Slab To be Removed	837	0.02		
Pavement not to be removed	11,176	0.26		
Gravel	57,908	1.33		
Total	78,458	1.80		
Remaining Components	SQFT	ACRES		
Buildings (Storage)	8,537	0.20		
Concrete Paving	11,176	0.26		
Concrete Area 1	8,342	0.19		
Concrete Area 2	2,034	0.05		
Concrete Area 3	800	0.02		
Total	30,889	0.45		
Demolition	SQFT	ACRES		
Asphalt Demolition	46,732			
Total	46,732	1.07		
New Construction	SQFT	ACRES		
<i>Parking Lot/Asphalt Paving</i>	58,745	1.35		

CalEEMod Land Use Inputs

Land Use Type	Land Use Subtype	Unit Amount	Size Metric	Lot Acreage*	Land Use Square Feet
Parking	Parking Lot	58.745	1000 sqft	1.35	58,745

Demolition

Component	Amount to be Demolished (Tons)	Haul Truck Capacity (tons) ¹	Haul Distance (miles) ¹	Total Trip Ends	Duration (days)	Total Trip Ends/Day
Total Asphalt Demo	750	20	20	76	20	4
Total	750			76		4

¹ CalEEMod Default

Architectural Coating (Life Sciences)

Percentage of Proposed Buildings' Interior

Painted: 100%

Percentage of Proposed Buildings' Exterior

Painted: 100%

Rule 1113

Interior Paint VOC content: 50 grams per liter

Exterior Paint VOC content: 50 grams per liter

Non-Residential	Land Use Square Feet	CalEEMod Factor ²	Total Paintable Surface Area	Paintable Interior Area ¹	Paintable Exterior Area ¹
Parking Lot	58,745	6%	3,525		3,525
			3,525		3,525

¹ CalEEMod methodology calculates the paintable interior and exterior areas by multiplying the total paintable surface area by 75 and 25 percent, respectively.

² The program assumes the total surface for painting equals 2.7 times the floor square footage for residential and 2 times that for nonresidential square footage defined by the user.

Architectural coatings for the parking lot is based on CalEEMod methodology applied to a surface parking lot (i.e., striping), in which 6% of surface area is painted.

³ 100% of the interior and exterior of buildings to be modernized will be painted

Construction Mitigation

SCAQMD Rule 403

Replace Ground Cover	PM10:	5	% Reduction
Replace Ground Cover	PM2.5:	5	% Reduction

Water Exposed Area	Frequency:	2	per day
	PM10:	55	% Reduction
	PM25:	55	% Reduction

Unpaved Roads	Vehicle Speed:	15	mph
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SCAQMD Rule 1186	Clean Paved Road	9	% PM Reduction
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Southern California Edison Carbon Intensity Factors

CO ₂ : ^{1,2}	531.44	pounds per megawatt hour
CH ₄ : ³	0.029	pound per megawatt hour
N ₂ O: ³	0.00617	pound per megawatt hour

¹ Based on CO₂e intensity factor of 534 pounds per megawatt hour; Southern California Edison. 2019, May. 2018 Sustainability Report.

<https://www.edison.com/content/dam/eix/documents/sustainability/eix-2019-sustainability-report.pdf>.

² Based on Intergovernmental Panel on Climate Change Fourth Assessment Report global warming potentials for CH₄ and N₂O; Intergovernmental Panel on Climate Change (IPCC). 2007. Fourth Assessment Report: Climate Change 2007.

³ CalEEMod default values.

Global Warming Potentials (GWP)		
	AR4	AR5
CO ₂	1	1
CH ₄	25	28
N ₂ O	298	265

Based on Intergovernmental Panel on Climate Change Fourth Assessment Report global warming potentials for CH₄ and N₂O; Intergovernmental Panel on Climate Change (IPCC).

Construction Activities and Schedule Assumptions: 15252 East Valley Boulevard

*based on CalEEMod default construction durations provided by applicant

		Construction Schedule		
Construction Activities	Phase Type	Start Date	End Date	CalEEMod Duration (Workday)
Asphalt Demo	Demolition	11/1/2020	11/27/2020	20
	Demolition Debris Haul	11/1/2020	11/27/2020	20
Site Preparation	Site Preparation	11/28/2020	12/1/2020	2
Grading	Grading	12/2/2020	12/7/2020	4
Building Construction	Building Construction	12/8/2020	9/13/2021	200
Paving	paving	9/14/2021	9/27/2021	10
Architectural Coating	Architectural Coating	9/28/2021	10/11/2021	10

CalEEMod Defaults Normalized and Overlapping Construction Activities

Construction Activities	Phase Type	Start Date	End Date	CalEEMod Duration (Workday)
Asphalt Demo	Demolition	11/1/2020	11/27/2020	20
	Demolition Debris Haul	11/1/2020	11/27/2020	20
Site Preparation	Site Preparation	11/28/2020	12/1/2020	2
Grading	Grading	12/2/2020	12/7/2020	4
Paving	Paving	12/8/2020	12/21/2020	10
Architectural Coating	Architectural Coating	12/8/2020	12/21/2020	10
				36

Pavement Volume to Weight Conversion

Component	Total SF of Area¹	Assumed Thickness (foot)²	Debris Volume (cu. ft)	Weight of gravel or crushed stone (lbs/cf)³	AC Mass (lbs)	AC Mass (tons)
Asphalt Demolition	46,732	0.333	15,577	96	1,500,035	750.02

¹ Based on aerial image of existing project site.

² Pavements and Surface Materials. Nonpoint Education for Municipal Officials, Technical Paper Number 8. University of Connecticut Cooperative Extension System, 1999.

³ <https://www.calrecycle.ca.gov/swfacilities/cdi/Tools/Calculations>

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Parking Lot	58.74	1000sqft	1.35	58,745.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	531.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Based on CO2e intensity factor of 534 pounds per megawatt hour; Southern California Edison. 2019, May. 2018 Sustainability Report

Land Use -

Construction Phase - No Construction of buildings, just paving. Overlapping paving and coating.

Trips and VMT - Add 4 vendor trips to account for SCAQMD Rule 403.

Demolition -

Architectural Coating - Rule 1113

Energy Use -

Construction Off-road Equipment Mitigation - SCAQMD Rule 1186

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Los Angeles-South Coast County, Winter

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Parking	100.00	50.00
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	9
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblLandUse	LandUseSquareFeet	58,740.00	58,745.00
tblProjectCharacteristics	CO2IntensityFactor	702.44	531.44
tblTripsAndVMT	HaulingTripNumber	74.00	76.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	2.3449	22.5256	15.5588	0.0295	5.9146	1.1593	6.7383	2.9848	1.0826	3.7427	0.0000	2,893.6727	2,893.6727	0.6316	0.0000	2,909.4635
Maximum	2.3449	22.5256	15.5588	0.0295	5.9146	1.1593	6.7383	2.9848	1.0826	3.7427	0.0000	2,893.6727	2,893.6727	0.6316	0.0000	2,909.4635

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	2.3449	22.5256	15.5588	0.0295	2.5857	1.1593	3.4094	1.2917	1.0826	2.0496	0.0000	2,893.6727	2,893.6727	0.6316	0.0000	2,909.4635
Maximum	2.3449	22.5256	15.5588	0.0295	2.5857	1.1593	3.4094	1.2917	1.0826	2.0496	0.0000	2,893.6727	2,893.6727	0.6316	0.0000	2,909.4635

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	56.28	0.00	49.40	56.72	0.00	45.24	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	11/1/2020	11/27/2020	5	20	
2	Site Preparation	Site Preparation	11/28/2020	12/1/2020	5	2	
3	Grading	Grading	12/2/2020	12/7/2020	5	4	
4	Paving	Paving	12/8/2020	12/21/2020	5	10	
5	Architectural Coating	Architectural Coating	12/8/2020	12/21/2020	5	10	

Acres of Grading (Site Preparation Phase): 1

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 1.35

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 3,525

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	4.00	76.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	4.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	4.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.8025	0.0000	0.8025	0.1215	0.0000	0.1215			0.0000			0.0000
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241	0.8025	1.1525	1.9549	0.1215	1.0761	1.1976		2,322.3127	2,322.3127	0.5970		2,337.2363

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0340	1.1068	0.2573	2.9500e-003	0.0664	3.5400e-003	0.0700	0.0182	3.3900e-003	0.0216		319.6158	319.6158	0.0229		320.1893
Vendor	0.0149	0.4254	0.1230	1.0100e-003	0.0256	2.0300e-003	0.0276	7.3700e-003	1.9500e-003	9.3200e-003		107.7796	107.7796	7.2100e-003		107.9598
Worker	0.0664	0.0471	0.5213	1.4500e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		143.9647	143.9647	4.5400e-003		144.0781
Total	0.1153	1.5793	0.9016	5.4100e-003	0.2374	6.7800e-003	0.2441	0.0641	6.4600e-003	0.0706		571.3600	571.3600	0.0347		572.2272

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3431	0.0000	0.3431	0.0519	0.0000	0.0519			0.0000			0.0000
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241	0.3431	1.1525	1.4955	0.0519	1.0761	1.1281	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0340	1.1068	0.2573	2.9500e-003	0.0619	3.5400e-003	0.0655	0.0171	3.3900e-003	0.0205		319.6158	319.6158	0.0229		320.1893
Vendor	0.0149	0.4254	0.1230	1.0100e-003	0.0240	2.0300e-003	0.0260	6.9700e-003	1.9500e-003	8.9200e-003		107.7796	107.7796	7.2100e-003		107.9598
Worker	0.0664	0.0471	0.5213	1.4500e-003	0.1339	1.2100e-003	0.1352	0.0358	1.1200e-003	0.0369		143.9647	143.9647	4.5400e-003		144.0781
Total	0.1153	1.5793	0.9016	5.4100e-003	0.2198	6.7800e-003	0.2266	0.0598	6.4600e-003	0.0663		571.3600	571.3600	0.0347		572.2272

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.7996	0.8210	6.6205	2.9537	0.7553	3.7090		1,667.4119	1,667.4119	0.5393		1,680.8937

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0149	0.4254	0.1230	1.0100e-003	0.0256	2.0300e-003	0.0276	7.3700e-003	1.9500e-003	9.3200e-003		107.7796	107.7796	7.2100e-003		107.9598
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		88.5936	88.5936	2.7900e-003		88.6634
Total	0.0558	0.4544	0.4438	1.9000e-003	0.1150	2.7800e-003	0.1178	0.0311	2.6400e-003	0.0337		196.3733	196.3733	0.0100		196.6232

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.4793	0.0000	2.4793	1.2627	0.0000	1.2627			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	2.4793	0.8210	3.3003	1.2627	0.7553	2.0180	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0149	0.4254	0.1230	1.0100e-003	0.0240	2.0300e-003	0.0260	6.9700e-003	1.9500e-003	8.9200e-003		107.7796	107.7796	7.2100e-003		107.9598
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0824	7.5000e-004	0.0832	0.0220	6.9000e-004	0.0227		88.5936	88.5936	2.7900e-003		88.6634
Total	0.0558	0.4544	0.4438	1.9000e-003	0.1064	2.7800e-003	0.1092	0.0290	2.6400e-003	0.0316		196.3733	196.3733	0.0100		196.6232

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Total	1.3498	15.0854	6.4543	0.0141	4.9143	0.6844	5.5986	2.5256	0.6296	3.1552		1,365.7183	1,365.7183	0.4417		1,376.7609
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0149	0.4254	0.1230	1.0100e-003	0.0256	2.0300e-003	0.0276	7.3700e-003	1.9500e-003	9.3200e-003		107.7796	107.7796	7.2100e-003		107.9598
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		88.5936	88.5936	2.7900e-003		88.6634
Total	0.0558	0.4544	0.4438	1.9000e-003	0.1150	2.7800e-003	0.1178	0.0311	2.6400e-003	0.0337		196.3733	196.3733	0.0100		196.6232

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.1008	0.0000	2.1008	1.0797	0.0000	1.0797			0.0000			0.0000

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	2.1008	0.6844	2.7852	1.0797	0.6296	1.7093	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0149	0.4254	0.1230	1.0100e-003	0.0240	2.0300e-003	0.0260	6.9700e-003	1.9500e-003	8.9200e-003		107.7796	107.7796	7.2100e-003		107.9598
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0824	7.5000e-004	0.0832	0.0220	6.9000e-004	0.0227		88.5936	88.5936	2.7900e-003		88.6634
Total	0.0558	0.4544	0.4438	1.9000e-003	0.1064	2.7800e-003	0.1092	0.0290	2.6400e-003	0.0316		196.3733	196.3733	0.0100		196.6232

3.5 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.3537					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.1939	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0664	0.0471	0.5213	1.4500e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		143.9647	143.9647	4.5400e-003		144.0781
Total	0.0664	0.0471	0.5213	1.4500e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		143.9647	143.9647	4.5400e-003		144.0781

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
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IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.3537					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.1939	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0664	0.0471	0.5213	1.4500e-003	0.1339	1.2100e-003	0.1352	0.0358	1.1200e-003	0.0369		143.9647	143.9647	4.5400e-003		144.0781
Total	0.0664	0.0471	0.5213	1.4500e-003	0.1339	1.2100e-003	0.1352	0.0358	1.1200e-003	0.0369		143.9647	143.9647	4.5400e-003		144.0781

3.6 Architectural Coating - 2020

Unmitigated Construction On-Site

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.8169					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	1.0591	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0256	0.0181	0.2005	5.6000e-004	0.0559	4.7000e-004	0.0564	0.0148	4.3000e-004	0.0153		55.3710	55.3710	1.7500e-003		55.4147
Total	0.0256	0.0181	0.2005	5.6000e-004	0.0559	4.7000e-004	0.0564	0.0148	4.3000e-004	0.0153		55.3710	55.3710	1.7500e-003		55.4147

Mitigated Construction On-Site

IND-22.3 - Los Angeles-South Coast County, Winter

IND-22.3

Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	0.8169					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	1.0591	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0256	0.0181	0.2005	5.6000e-004	0.0515	4.7000e-004	0.0520	0.0138	4.3000e-004	0.0142		55.3710	55.3710	1.7500e-003		55.4147
Total	0.0256	0.0181	0.2005	5.6000e-004	0.0515	4.7000e-004	0.0520	0.0138	4.3000e-004	0.0142		55.3710	55.3710	1.7500e-003		55.4147

Regional Construction Criteria Air Pollutants

3.2 Demolition - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
Category lb/day						
Fugitive Dust					0	0
Off-Road	2	21	15	0	1	1
Hauling	0	1	0	0	0	0
Vendor	0	0	0	0	0	0
Worker	0	0	1	0	0	0
Total	2	23	16	0	2	1

3.3 Site Preparation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
Category lb/day						
Fugitive Dust					2	1
Off-Road	2	18	8	0	1	1
Hauling	0	0	0	0	0	0
Vendor	0	0	0	0	0	0
Worker	0	0	0	0	0	0
Total	2	19	8	0	3	2

3.4 Grading - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
Category lb/day						
Fugitive Dust					2	1
Off-Road	1	15	6	0	1	1
Hauling	0	0	0	0	0	0
Vendor	0	0	0	0	0	0
Worker	0	0	0	0	0	0
Total	1	16	7	0	3	2

Localized Construction Criteria Air Pollutants

3.2 Demolition - 2020

Mitigated Construction On-Site

	NOx	CO	PM10 Total	PM2.5 Total
Category lb/day				
Fugitive Dust			0.34	0.05
Off-Road	21	15	1.15	1.08
Total	21	15	1.50	1.13
1.35-acres LSTs	96	798	5.70	4.35
Exceeds?	No	No	No	No

3.3 Site Preparation - 2020

Mitigated Construction On-Site

	NOx	CO	PM10 Total	PM2.5 Total
Category lb/day				
Fugitive Dust			2.48	1.26
Off-Road	18	8	0.82	0.76
Total	18	8	3.30	2.02
1.35-acres LSTs	96	798	5.70	4.35
Exceeds?	No	No	No	No

3.4 Grading - 2020

Mitigated Construction On-Site

	NOx	CO	PM10 Total	PM2.5 Total
Category lb/day				
Fugitive Dust			2.10	1.08
Off-Road	15	6	0.68	0.63
Total	15	6	2.79	1.71
1.35-acres LSTs	96	798	5.70	4.35
Exceeds?	No	No	No	No

Localized Construction Criteria Air Pollutants

3.5 Paving - 2020 Overlapping 3.6 Architectural Coating - 2020

Mitigated Construction On-Site

		NOx	CO	PM10 Total	PM2.5 Total
Category	lb/day				
Off-Road		8	9	0.47	0.43
Paving				0.00	0.00
Total		8	9	0.47	0.43
1-acres LSTs		83	673	5.00	4.00
Exceeds?		No	No	No	No

3.6 Architectural Coating - 2020

Mitigated Construction On-Site

		NOx	CO	PM10 Total	PM2.5 Total
Category	lb/day				
Archit. Coating				0.00	0.00
Off-Road		2	2	0.11	0.11
Total		2	2	0.11	0.11
1-acres LSTs		83	673	5.00	4.00
Exceeds?		No	No	No	No

Overlapping Paving and Architectural Coating

Total		10	11	0.58	0.54
1-acres LSTs		83	673	5.00	4.00
Exceeds?		No	No	No	No

Construction Localized Significance Thresholds: Demolition

SRA No.	Acres Disturbed	Source Receptor Distance (meters)	Source Receptor Distance (Feet)	Construction / Project Site Size (Acres)
11	1.35	25	82	1.35

Source Receptor Distance (meters)	South San Gabriel Valley	Equipment	Acres/8-hr Day	Acres/1-hr	Equipment Used	Daily Hours	Acres
	25	Tractors	0.5	0.0625	3	8	1.5
NOx	96	Graders	0.5	0.0625			0
CO	798	Dozers	0.5	0.0625	1	8	0.5
PM10	5.70	Scrapers	1	0.125			0
PM2.5	4.35					Acres	2.00

	Acres	25	50	100	200	500
NOx	1	83	84	96	123	193
	2	121	118	126	147	206
CO	1	673	760	107	131	198
	2	1031	1143	1113	2660	6884
PM10	1	798	894	1267	2303	7110
	2	5	13	29	60	153
PM2.5	1	7	22	37	68	162
	2	6	16	32	63	156
		4	5	9	20	83
		5	8	12	24	89
		4	6	10	21	85

South San Gabriel Valley

	1.35 Acres	25	50	100	200	500
NOx	96	96	107	131	198	
CO	798	894	1267	2303	7110	
PM10	6	16	32	63	156	
PM2.5	4	6	10	21	85	

Acre Below		Acre Above	
SRA No.	Acres	SRA No.	Acres
11	1	11	2
Distance Increment Below			
25			
Distance Increment Above			
25			

Updated: 10/21/2009 - Table C-1. 2006 – 2008

Construction Localized Significance Thresholds: Grading

SRA No.	Acres Disturbed	Source Receptor Distance (meters)	Source Receptor Distance (Feet)	Construction / Project Site Size (Acres)
11	1.35	25	82	1.35

Source Receptor Distance (meters)	South San Gabriel Valley	Equipment	Acres/8-hr Day	Acres/1-hr	Equipment Used	Daily Hours	Acres
	25	Tractors	0.5	0.0625	1	8	0.5
NOx	96	Graders	0.5	0.0625	1	8	0.5
CO	798	Dozers	0.5	0.0625	1	7	0.4375
PM10	5.70	Scrapers	1	0.125			0
PM2.5	4.35					Acres	1.44

	Acres	25	50	100	200	500
NOx	1	83	84	96	123	193
	2	121	118	126	147	206
		96	96	107	131	198
CO	1	673	760	1113	2110	6884
	2	1031	1143	1554	2660	7530
		798	894	1267	2303	7110
PM10	1	5	13	29	60	153
	2	7	22	37	68	162
		6	16	32	63	156
PM2.5	1	4	5	9	20	83
	2	5	8	12	24	89
		4	6	10	21	85

South San Gabriel Valley

	1.35 Acres	25	50	100	200	500
NOx	96	96	107	131	198	198
CO	798	894	1267	2303	7110	7110
PM10	6	16	32	63	156	156
PM2.5	4	6	10	21	85	85

Acre Below		Acre Above	
SRA No.	Acres	SRA No.	Acres
11	1	11	2
Distance Increment Below			
25			
Distance Increment Above			
25			

Updated: 10/21/2009 - Table C-1. 2006 – 2008

Construction Localized Significance Thresholds: Paving and Architectural Coating (overlapping)

SRA No.	Acres Disturbed	Source Receptor Distance (meters)	Source Receptor Distance (Feet)	Construction / Project Site Size (Acres)
11	0.50	25	82	1.35

Source Receptor Distance (meters)	South San Gabriel Valley	Equipment	Acres/8-hr Day	Acres/1-hr	Equipment Used	Daily Hours	Acres
	25	Tractors	0.5	0.0625	1	8	0.5
NOx	83	Graders	0.5	0.0625			0
CO	673	Dozers	0.5	0.0625			0
PM10	5.00	Scrapers	1	0.125			0
PM2.5	4.00					Acres	0.50

	Acres	25	50	100	200	500
NOx	1	83	84	96	123	193
	1	83	84	96	123	193
	1	83	84	96	123	193
CO	1	673	760	1113	2110	6884
	1	673	760	1113	2110	6884
	1	673	760	1113	2110	6884
PM10	1	5	13	29	60	153
	1	5	13	29	60	153
	1	5	13	29	60	153
PM2.5	1	4	5	9	20	83
	1	4	5	9	20	83
	1	4	5	9	20	83

South San Gabriel Valley						
0.50 Acres						
	25	50	100	200	500	
NOx	83	84	96	123	193	
CO	673	760	1113	2110	6884	
PM10	5	13	29	60	153	
PM2.5	4	5	9	20	83	

Acre Below		Acre Above	
SRA No.	Acres	SRA No.	Acres
11	1	11	1
Distance Increment Below			
25			
Distance Increment Above			
25			

Updated: 10/21/2009 - Table C-1. 2006 – 2008

Construction Localized Significance Thresholds: Site Preparation

SRA No.	Acres Disturbed	Source Receptor Distance (meters)	Source Receptor Distance (Feet)	Construction / Project Site Size (Acres)
11	1.35	25	82	1.35

Source Receptor Distance (meters)	South San Gabriel Valley	Equipment	Acres/8-hr Day	Acres/1-hr	Equipment Used	Daily Hours	Acres
	25	Tractors	0.5	0.0625	1	8	0.5
NOx	96	Graders	0.5	0.0625	1	8	0.5
CO	798	Dozers	0.5	0.0625	1	7	0.4375
PM10	5.70	Scrapers	1	0.125			0
PM2.5	4.35					Acres	1.44

	Acres	25	50	100	200	500
NOx	1	83	84	96	123	193
	2	121	118	126	147	206
CO	1	673	760	107	131	198
	2	1031	1143	1113	2660	6884
PM10	1	798	894	1267	2303	7110
	2	5	13	29	60	153
PM2.5	1	7	22	37	68	162
	2	6	16	32	63	156
		4	5	9	20	83
		5	8	12	24	89
		4	6	10	21	85

South San Gabriel Valley

	1.35 Acres	25	50	100	200	500
NOx	96	96	107	131	198	
CO	798	894	1267	2303	7110	
PM10	6	16	32	63	156	
PM2.5	4	6	10	21	85	

Acre Below		Acre Above	
SRA No.	Acres	SRA No.	Acres
11	1	11	2
Distance Increment Below			
25			
Distance Increment Above			
25			

Updated: 10/21/2009 - Table C-1. 2006 – 2008

Appendix B VMT Evaluation Tool Report

Appendix

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Project Details

Timestamp of Analysis: August 04, 2020, 01:33:25 PM
 Project Name: Automobile Tow Truck Yard
 Project Description: Auto Tow Truck at 15252 Valley Boulevard, City of Industry

Project Location

Jurisdiction:	APN	TAZ
Industry	8208-023-052	22285100

Inside a TPA?
 Yes (Pass)

Analysis Details

Data Version: SCAG Regional Travel Demand Model
 2016 RTP Base Year 2012
 Analysis Methodology: TAZ
 Baseline Year: 2020

Project Land Use

Residential:
 Single Family DU:
 Multifamily DU:

 Total DUs: 0

Non-Residential:
 Office KSF:
 Local Serving Retail KSF: 8
 Industrial KSF:

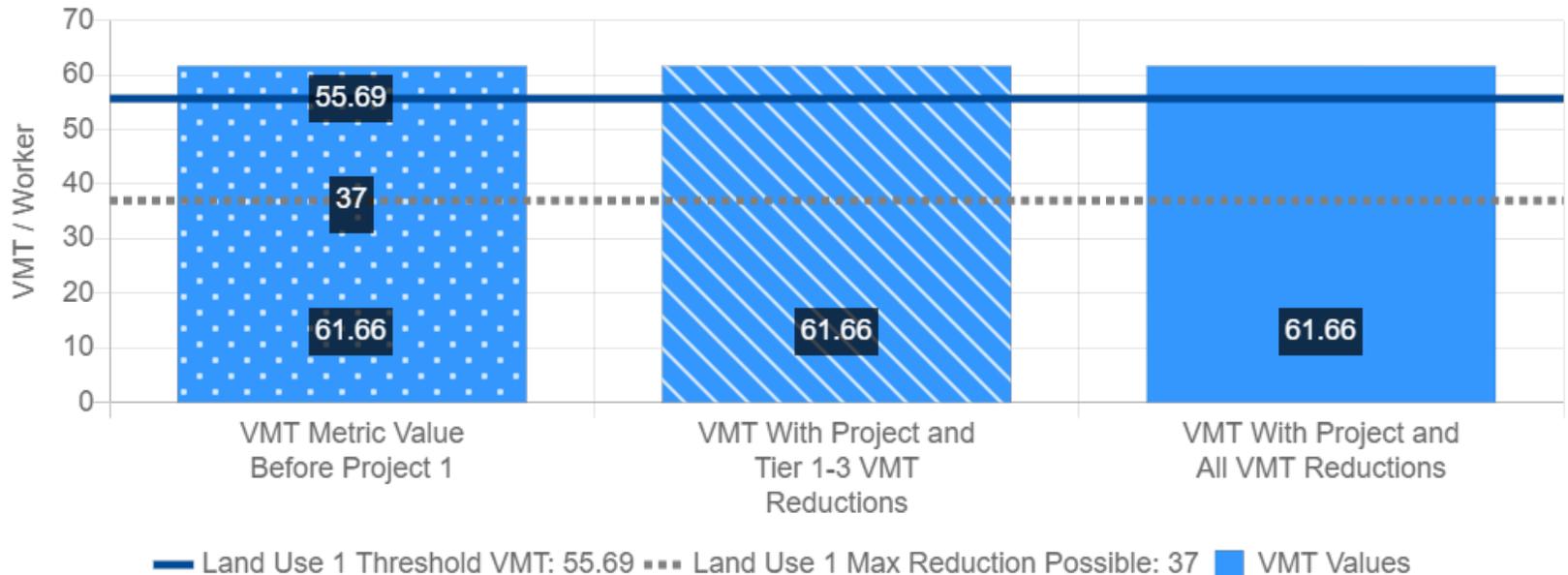
Residential Affordability (percent of all units):
 Extremely Low Income: 0 %
 Very Low Income: 0 %
 Low Income: 0 %

Parking:
 Motor Vehicle Parking: 17
 Bicycle Parking:

Commercial Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Commercial
VMT Without Project 1:	Total VMT per Service Population
VMT Baseline Description 1:	City Average
VMT Baseline Value 1:	55.69
VMT Threshold Description 1:	0%
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	61.66	61.66	61.66
Low VMT Screening Analysis	No (Fail)	No (Fail)	No (Fail)



Tier 1 Project Characteristics

PC01 Increase Residential Density

Existing Residential Density:	7.65
With Project Residential Density:	7.65

PC02 Increase Residential Diversity

Existing Residential Diversity Index:	0.68
With Project Residential Diversity Index:	0.69

PC03 Affordable Housing

PC04 Increase Employment Density

Existing Employment Density:	1314.82
With Project Employment Density:	1317.39

Tier 2 Multimodal Infrastructure

MI03 Increase Transit Accessibility

Distance to Closest Transit Stop:	478 ft
Distance to Closest Transit Stop With Project:	478 ft

Tier 3 Parking

PK01 Limit Parking Supply

Minimum Parking Required by City Code:	17
Total Parking Spaces Available to Employees:	17
Is the Surrounding Street Parking Restricted?:	

Tier 4 TDM Programs