COMMERCE CITY HALL
Council Chambers
5655 Jillson Street
Commerce, CA 90040
Phone: (323) 722-4805
Fax: (323) 726-6231

AGENDA

SPECIAL MEETING OF THE PLANNING COMMISSION - (TELECONFERENCE)
MONDAY, SEPTEMBER 28, 2020 – 6:30 P.M.
PHONE NUMBER: (669) 900-9128
ACCESS CODE NUMBER: 936 8760 5928
PASSWORD: 838914

BROWN ACT COMPLIANCE DURING COVID-19 EMERGENCY:

On March 18, 2020, Executive Order N-29-20 was signed by Governor Gavin Newsome and provides local legislative body authority to hold public meetings via teleconferencing and make public meetings accessible "telephonically or otherwise electronically" to all members of the public seeking to observe and to address the legislative body. All requirements of the Brown Act expressly or impliedly requiring the physical presence of board members or of the public as a condition of a quorum or public meeting are waived. Members of the public can provide public comment by calling the telephone number above during the time and date noted herein.

CALL TO ORDER Vice Chairperson Gonzalez

FLAG SALUTE / INVOCATION Commissioner Serfozo

ROLL CALL

REORGANIZATION: The Commission will reorganize and select a Chairperson and Vice Chairperson.

PUBLIC COMMENT

The public is given this opportunity to address the Planning Commission on any matter within its responsibility. Discussion or deliberation will not be entered into at this time in accordance with the Brown Act.

SCHEDULED MATTER

1. Plot Plan No. 995, Tentative Tract Map No. 82890, 82891, 82892, and Development Agreement - Three parcels (or sites) located at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street, Commerce, CA 90040

Kim Prijatel
Senior Vice President of Development
City Ventures
3121 Michelson Drive, Suite 150
Irvine, CA 92612

This item was continued from the meetings of July 20, 2020 and August 31, 2020.

The applicant, Kim Prijatel, representing City Ventures, is proposing to construct 133 single-family attached residential units on three parcels to be known as Rosewood Village. The Project will be built in three phases. The Project includes the following discretionary approvals as follows: 1) Plot Plan Review for a new Multi-Family Housing project, 2) Tentative Tract Map 82890 – creating one (1) lot for 37 residential units; 3) Tentative Tract Map 82891 – creating one (1) lot for 31 residential units; 4) Tentative Tract Map 82892 – creating one (1) lot for 65 residential units; 5) Demolition – demolition of all existing structures on the three sites, and 6) to acknowledge and recommend to the City Council for the approval of the Development Agreement – covering the details of the City's sell of the land known as Assessor's Parcel Numbers (APN) 6335-025-902, 903, 905, and 906, to City Ventures for the development of 133 single-family attached dwelling units.

Pursuant to Chapter 19.39 Division 10 (Site Plan Review) of the Commerce Municipal Code (CMC), a Plot Plan Review is required for any new building or structure in excess of 25,000 square feet in area.

Staff recommendation: Recommend City Council approval.

COMMISSION / STAFF REPORTS

ADJOURNMENT

Agenda and written materials are available for public inspection immediately following the posting of this agenda (at least 72 hours prior to a regular Planning Commission meeting) on the City Web and at the following link: https://cityofcommerce.legistar.com/Calendar.aspx

STAFF REPORT
PLOT PLAN REVIEW NO. 995, TENTATIVE TRACT MAP NO. 82890, 82891, 82892, AND DEVELOPMENT AGREEMENT

TO: Planning Commission

FROM: Economic Development and Planning Department

DATE: September 28, 2020 (Continued from August 31, 2020 and July 20, 2020 meetings)

CASE NO: Plot Plan No. 995

APPLICATION REQUEST: The applicant, Kim Prijatel, representing City Ventures, is proposing to construct 133 single-family attached residential units on three parcels to be known as Rosewood Village. The Project will be built in three phases. The Project includes the following discretionary approvals as follows: 1) Plot Plan Review for a new Multi-Family Housing project, 2) Tentative Tract Map 82890 – creating one (1) lot for 37 residential units; 3) Tentative Tract Map 82891 – creating one (1) lot for 31 residential units; 4) Tentative Tract Map 82892 – creating one (1) lot for 65 residential units; 5) Demolition – demolition of all existing structures on the three sites, and 6) to acknowledge and recommend to the City Council for the approval of the Development Agreement – covering the details of the City's sell of the land known as Assessor's Parcel Numbers (APN) 6335-025-902, 903, 905, and 906, to City Ventures for the development of 133 single-family attached dwelling units.

Pursuant to Chapter 19.39 Division 10 (Site Plan Review) of the Commerce Municipal Code (CMC), a Plot Plan Review is required for any new building or structure in excess of 25,000 square feet in area.

PROPERTY LOCATION: The Project consists of three parcels (or sites) located at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street, Commerce, CA 90040

APPLICANT: Kim Prijatel
Senior Vice President of Development
City Ventures
3121 Michelson Drive, Suite 150
Irvine, CA 92612

UPDATES FOLLOWING JULY PUBLIC HEARING

On July 20, 2020, Planning staff presented this item to the Planning Commission. Following a public hearing, supported by public testimony, direction was provided to staff to conduct additional analysis, primarily regarding guest parking as well as to host a community meeting with the public to discuss the project. During the August 31, 2020 meeting with the Commission, staff provided an update regarding July's community meeting, and changes made to address the guest parking concern. Following staff's presentation and public testimony of August 31st, additional direction was given to staff to study an affordable component. Tonight a summary of that discussion will be provided.

STAFF RECOMMENDATION: Following a staff presentation and Public Hearing, staff requests that the Planning Commission approve Plot Plan No. 995 for a new Multi-Family Housing project; and approve Tentative Tract Map 82890 – creating one (1) lot for 37 residential units; Tentative Tract Map 82891 – creating one (1) lot for 31 residential units; and Tentative Tract Map 82892 – creating one (1) lot for 65 residential units with the Specific Findings, Conditions of Approval, and adopt an Mitigated Negative Declaration and Mitigation Monitoring & Reporting Program pursuant to Section 15072 of the California Environmental Quality Act (CEQA) and to acknowledge and recommend to the City Council for the approval of the Development Agreement that will cover the details of the City's sell of the land known as Assessor's Parcel Numbers (APN) 6335-025-902, 903, 905, and 906, to City Ventures for the development of 133 single-family attached dwelling units.

PUBLIC HEARING NOTICE: Notice was published in the Los Cerritos Community News on September 18, 2020 mailed out to property owners within 500 feet of the subject property, and to public agencies and interested organizations.

ATTACHMENTS:

A) Initial Study
B) Mitigated Negative Declaration and Mitigation Monitoring & Reporting Program
C) Specific Findings for Plot Plan;
D) Conditions of Approval;
E) Plans
F) Focused Traffic Study / Harbor and Jillson Site
G) County of Los Angeles Fire Department - Conditions of Approval, dated September 4, 2020

LAND USE, ZONING AND APPLICABLE REGULATIONS:

Project Site – 5550 Harbor Street, 5625 and 5555 Jillson Street	
General Plan Designation:	Housing Opportunity Overlay (HOO)
Zoning:	HOO / M-2 (Heavy Industrial)
Applicable Zoning Regulations:	Commerce Municipal Code Chapter 19.47 Housing Opportunity Overlay Zone; CMC Chapter 19.47.040, Development Standards; CMC Chapter 19.21, Off-Street Parking; CMC Chapter 19.23, Landscaping; CMC Chapter 19.39 Division 10, Site Plan Review; CMC Section 19.39.680 Basis for Approval.

SURROUNDING ZONING AND LAND USES:

Site 1A - 5550 Harbor Street		
Direction	**Zoning**	**Land Use**
North	R-1	Low Density Residential
South	HOO / M-2	Housing Opportunity / Industrial
East	PF	Public Facilities
West	HOO / M-2	Housing Opportunity / Industrial

Site 1B - 5625 Jillson Street and Site 2 - 5555 Jillson Street (Transportation Center)		
Direction	**Zoning**	**Land Use**
North	HOO / M-2	Housing Opportunity / Industrial
South	C/M-1	Commercial Manufacturing
East	PF	Public Facilities
West	HOO / M-2	Housing Opportunity / Industrial

ENVIRONMENTAL ASSESSMENT:

An Environmental Initial Study in compliance with the California Environmental Quality Act (CEQA) was prepared for the project, which determined that there could be anticipated potential significant environmental impacts, unless mitigated. Therefore, a Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA).

The environmental assessment identifies adverse environmental impacts (Aesthetics, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials,

Noise, Public Services, Transportation, Tribal Cultural Resources, and Wildfire), mitigation measures have been provided. The mitigation measures were designed to reduce the severity of the environmental impacts to levels less than significant, as defined by CEQA.

The mitigation measures are part of the Mitigation Monitoring Program and have been made part of the approval of this project. The applicant confirmed that the project description was accurate and agreed to all mitigation measures. A Notice of Intent to Adopt was submitted and filed. No State responsible agencies were identified and as a result, no Clearinghouse posting was required. Noticing was posted and published as required under the City's Municipal Code.

DESCRIPTION OF PROPERTY / BACKGROUND:

Environmental Setting

The Project site consists of three (3) developed sites described below:

Site 1A – Harbor (5550 Harbor Street) is irregular-shaped and approximately 1.98-acres (including the parking area of the Brenda Villa Aquatic Center). The site is flat and currently developed with one and one-half story, 27,376-square-foot, light industrial, warehouse, and attached office building built in 1956 and an asphalt parking lot associated with the Aquatic Center. Prior to the mid-1940s, the project area was used for agricultural orchards. A former railroad spur was located adjacent to the southerly property line and is now an alley. The site is bounded to the north by Harbor Street, to the west by a commercial warehouse structure, to the east by the Brenda Villa Aquatic Center, and to the south by an alley. There are power poles on the northern and western boundaries.

Site 1B – Jillson 1 (5625 Jillson Street) is irregular-shaped and approximately 1.33- acres. The site is flat and currently developed with a one and one-half story, 19,629-square-foot, light industrial, warehouse and attached office building constructed in 1949 and associated asphalt parking area, which is also used as a transitional storage area for miscellaneous household debris. A review of aerial photos indicates that the property was vacant with a railroad right-of-way associated with the Atchison Topeka Railroad heading onto the southern portion of the property from Jillson Street. The railroad right-of away was built around 1936. Then in 1949, the current building was built. The site is bounded to the north and east by railroad tracks, to the west by Site 2 – Transportation Center, and to the south by Jillson Street.

Site 2 – Transportation Center (5555 Jillson Street) is rectangular-shaped and approximately 2.43-acres. The site is developed with the City of Commerce Transportation Center office building and a two-story parking structure with a ramp built in 1997. The first floor of the parking structure is used for bus parking and

maintenance, which includes a dump station for sewage in the northeastern corner, and a bus wash in the southeastern corner. The northern portion of the on-site building is used for automobile service. It includes two in-ground hydraulic lifts, an alignment pit, four-post aboveground lifts, two aboveground scissor lifts, and an in-ground wash clarifier in the western portion of the building, which is connected to a smaller in-ground clarifier located in the eastern portion of the building. A three-stage clarifier is situated in the southeastern driveway, which is connected to the bus wash located in the northeastern portion of the Property. A review of aerial photos indicates that the property was vacant until around 1936 when a railroad right-of-way associated with the Atchison Topeka Railroad was built heading onto the northern portion of the property from Jillson Street. Then in 1952/1953, a structure and parking area were built. Lastly, by 2003 the 1952 structure was demolished, and the existing building and parking structure were added. The site is bounded to the north by railroad tracks, to the east by proper Site 1B – Jillson 1, to the west by commercial warehouse structure, and to the south by Jillson Street. An image of the project sites is shown below, outlined in blue:

STAFF ANALYSIS AND REVIEW:

Project Description

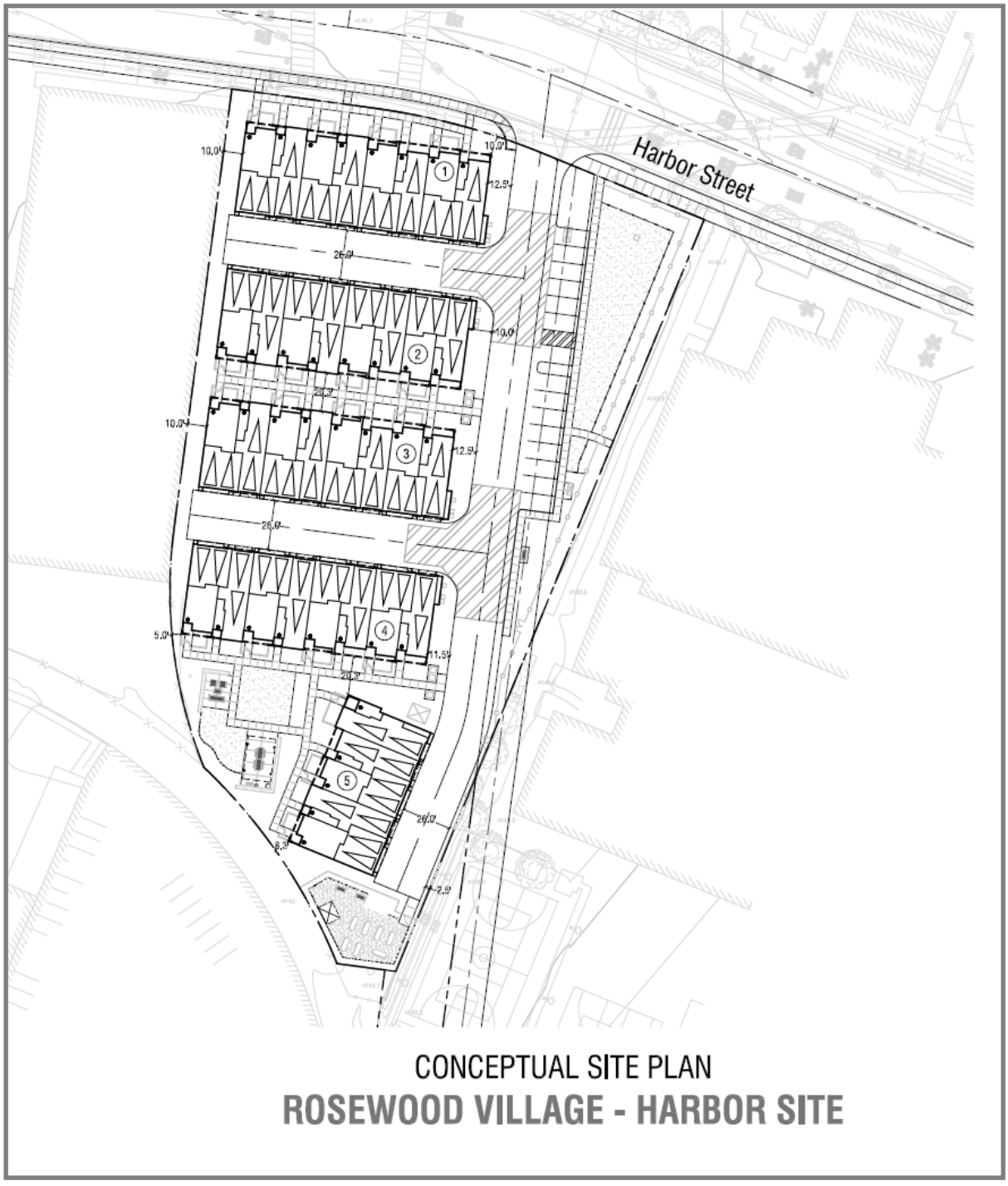
The Project consists of the development of 133 single-family attached residential units on three parcels to be known as Rosewood Village. As proposed, the project will be developed in three phases, as described as follows. Phase 1 of the Project will be Site 1A – Harbor (5550 Harbor Street) location. Phase 2 will be the Site 1B – Jillson 1 (5625 Jillson Street) location, and the Site 2 – Transportation Center (5555 Jillson Street) location will be Phase 3.

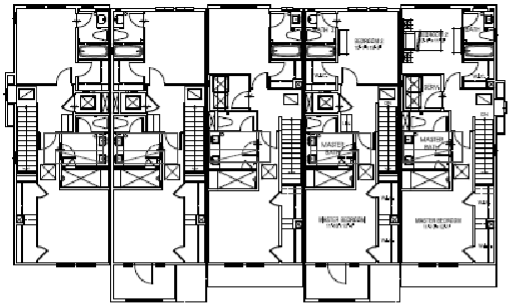
Site 1A – Harbor (5550 Harbor Street) The development proposes the construction of 37 single-family attached residences with private garages for two vehicles, private drive aisles, sidewalks, guest parking areas, and common landscaped areas. The buildings are proposed to be designed. The Project site will be accessible with an entrance/exit along Harbor Street.

The housing product includes five (5) three-story buildings, comprised of four (4) eight-plex buildings and one (1) five-plex building. Recommended are two-floor plans, ranging in size from 1,394-square-feet to 1,670-square feet. Each home will have a two-car garage, in one of two configurations; a one with tandem parking, and the other with side by side parking. The living space on the second level will benefit from an outdoor space provided by a private balcony.

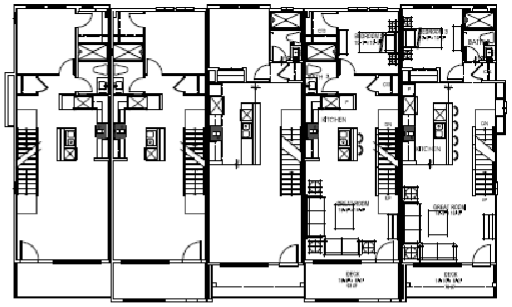
The architectural style of the building is proposed as Agrarian with Composition Shingle roofs and stucco walls. Accent features include siding and board and batten at select locations, horizontal wood-like railing, vertical metal railing, wood post, trellis, and coach lights. The following is the breakdown of the product information, site plan, floor plan, elevations, and landscaping plan:

Product Information for Site 1A – 5550 Harbor Street			
Building Type	**Building Size**	**Unit Area**	**Unit Design**
8-plex	18,988 sq. ft.		
Plan 1		1,394 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
5-plex	11,858 sq. ft.		
Plan 1		1,394 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space


Harbor Street
CONCEPTUAL SITE PLAN
ROSEWOOD VILLAGE - HARBOR SITE



THIRD FLOOR



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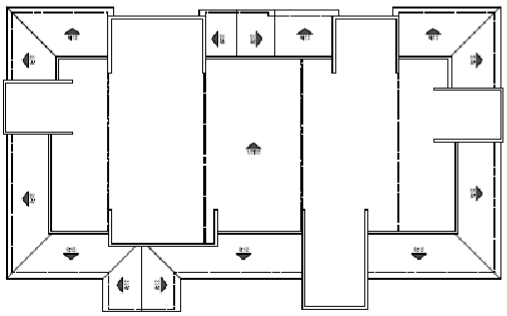
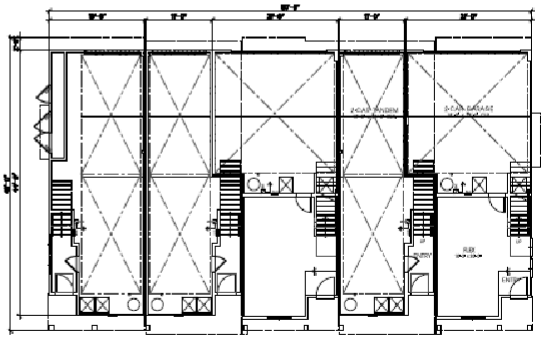
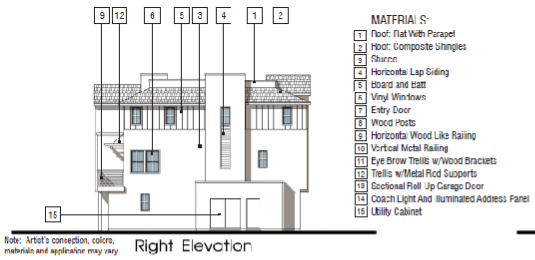


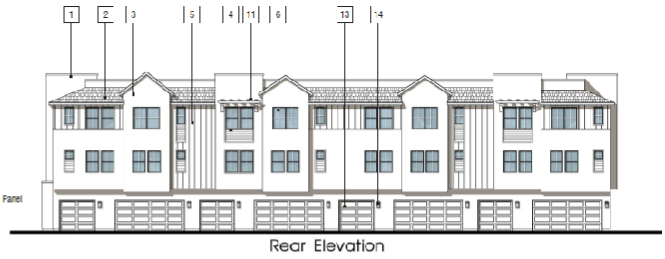
ROOF

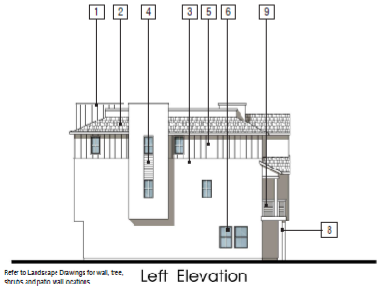


FIRST FLOOR

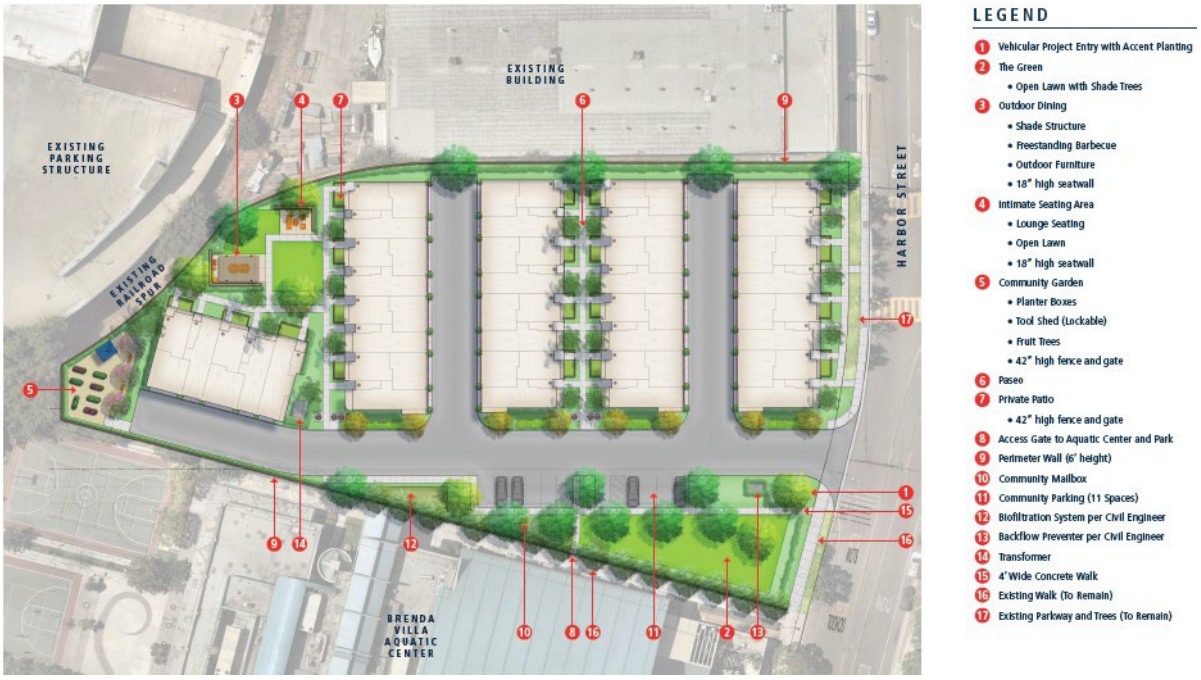
CONCEPT FLOOR PLAN







CONCEPT ELEVATIONS - 5550 HARBOR STREET



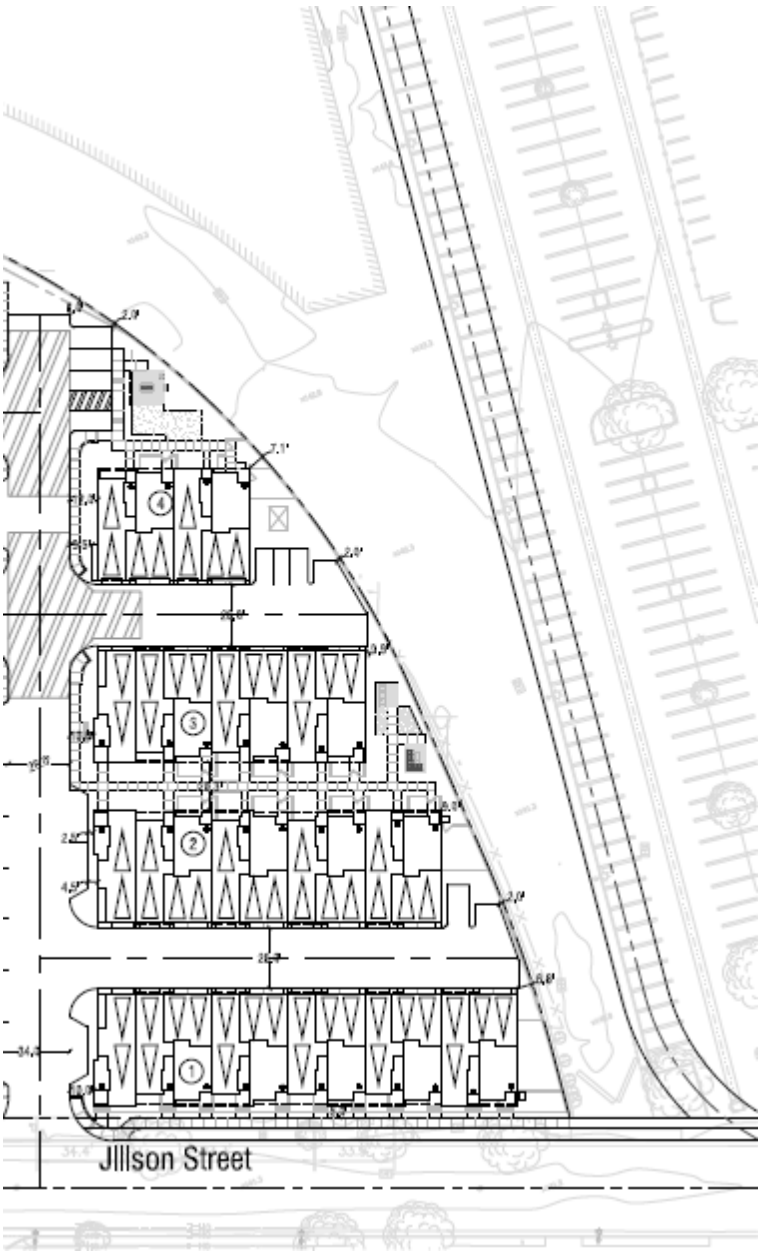
CONCEPT LANDSCAPING PLAN - 5550 HARBOR

Site 1B – Jillson 1 (5625 Jillson Street). The development proposes the construction of 31 single-family attached residences with private garages, private drive aisles, sidewalks, guest parking areas, and common landscaped areas. The Project site will be accessible with an entrance/exit along Jillson Street. An extension of drive aisles, guest parking areas, and sidewalk are proposed on a separate Tract Map 82892 that connects to the private drive aisle of the westerly boundary that sheet flows toward the proposed Project site. The acreage of this extension will be included in the calculation of sizing the catch basin and detention system.

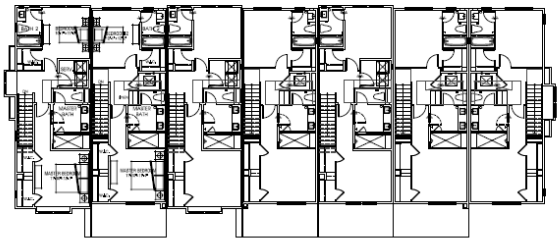
The housing product includes four (4) three-story buildings, comprised of one (1) four-plex building, one (1) seven-plex building, one (1) nine-plex building, and one (1) eleven-plex building. There are two-floor plans, ranging in size from 1,417-square-feet to 1,670-square feet. Each home will have a two-car garage, one with tandem parking, and the other with side by side parking. The living space on the second level will benefit from an outdoor space provided by a private balcony.

The architectural style of the building is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights. The following is the breakdown of the product information, site plan, floor plan, elevations, and landscaping plan:

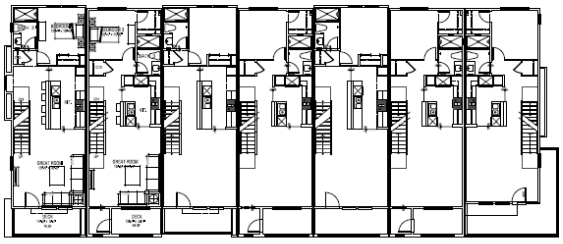
Product Information for Site 1B – 5625 Jillson Street			
Building Type	**Building Size**	**Unit Area**	**Unit Design**
4-plex	9,578 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
7-plex	16,829 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
9-plex	21,632 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
11-plex	18,791 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,654 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space



CONCEPTUAL SITE PLAN - 5625 JILLSON STREET



THIRD FLOOR



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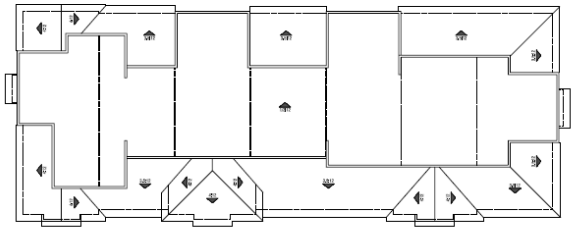
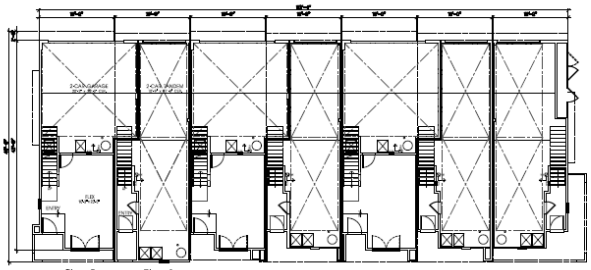
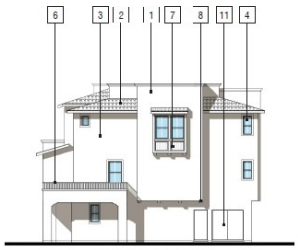


ROOF



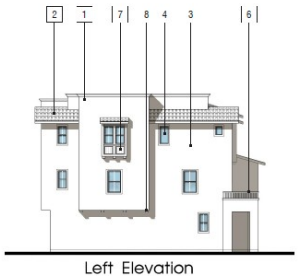
FIRST FLOOR

CONCEPT FLOOR PLAN



Right Elevation

Rear Elevation



Left Elevation

MATERIALS:

1 Roof: Flat With Parapet	7 Wood-Like Panel
2 Roof: S-Tile Roof	8 Decorative Corbels
3 Stucco	9 Sectional Roll-Up Garage Door
4 Vinyl Windows	10 Coach Light And Illuminated Address Panel
5 Entry Door	11 Utility Cabinet

Front Elevation

Scheme 1

Refer to Landscape Drawings for wall, tree, shrubs and patio wall locations

Note: Artist's conception, colors, materials and application may vary.

CONCEPT ELEVATIONS

CONCEPTUAL LANDSCAPING PLAN - 5625 JILLSON STREET

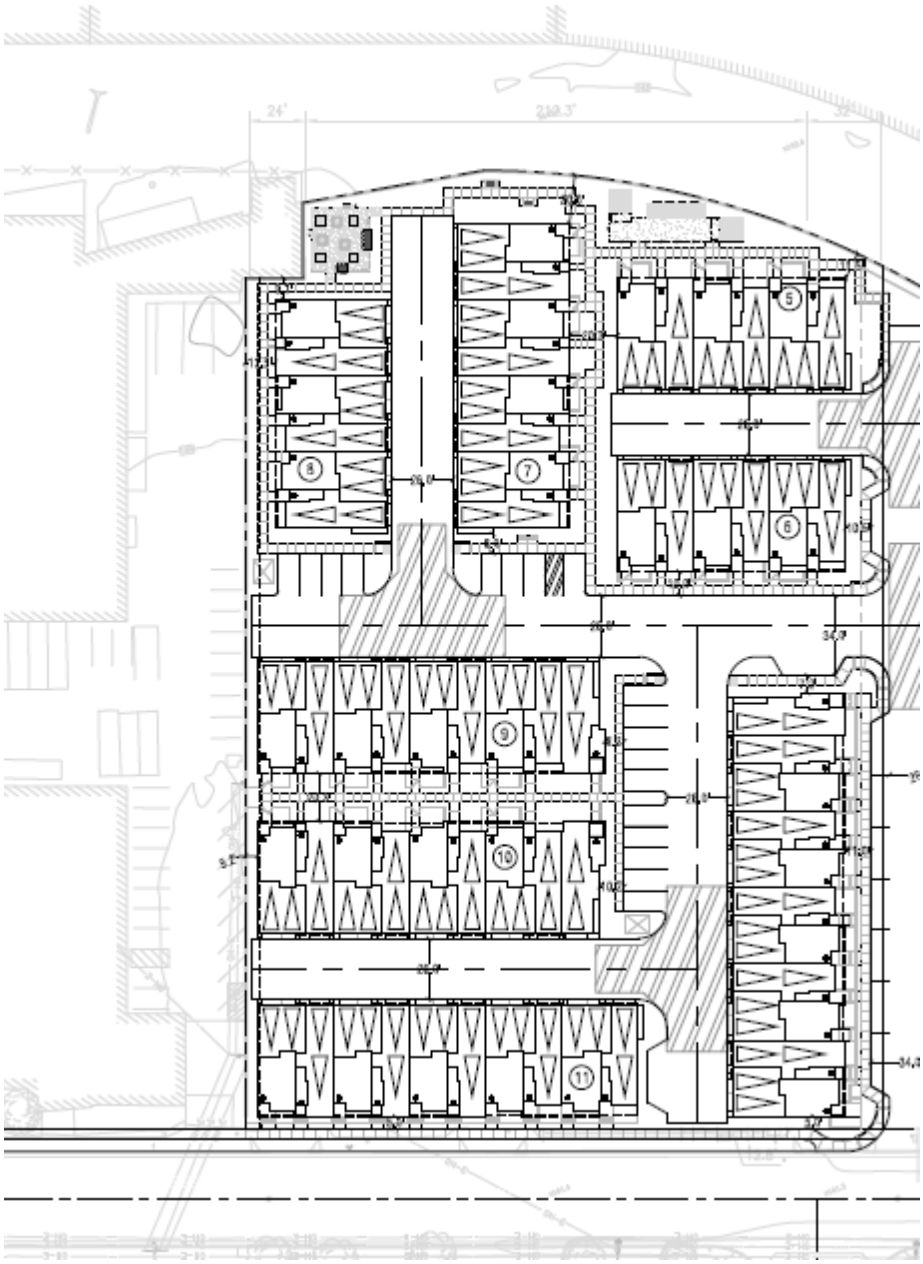
Site 2 – Transportation Center (5555 Jillson Street) The development proposes the construction of 65 single-family attached residences with private two-car garages, private drive aisles, sidewalks, guest-parking areas, and common and private landscaped areas. The Project site is an extension of the improvement of proposed Tract Map 82891, which will be accessible with an entrance/exit along Jillson Street. A portion of the drive aisles, guest parking areas, and sidewalks of the proposed Project site sheet flows on to Tract Map 82891 site that connects the private drive aisle of the easterly boundary. The acreage of this extension will be excluded in the calculation of sizing the catch basin and detention system.

The housing product includes eight (8) three-story buildings, comprised of three (3) six-plex buildings, one (1) eight-plex building, two (2) nine-plex buildings, one (1) ten-plex building, and one (1) eleven-plex building. There are two-floor plans, ranging in size from 1,417-square-feet to 1,670-square feet. Each home will have a two-car garage, one with tandem parking, and the other with side by side parking. The living space on the second level will benefit from an outdoor space provided by a private balcony.

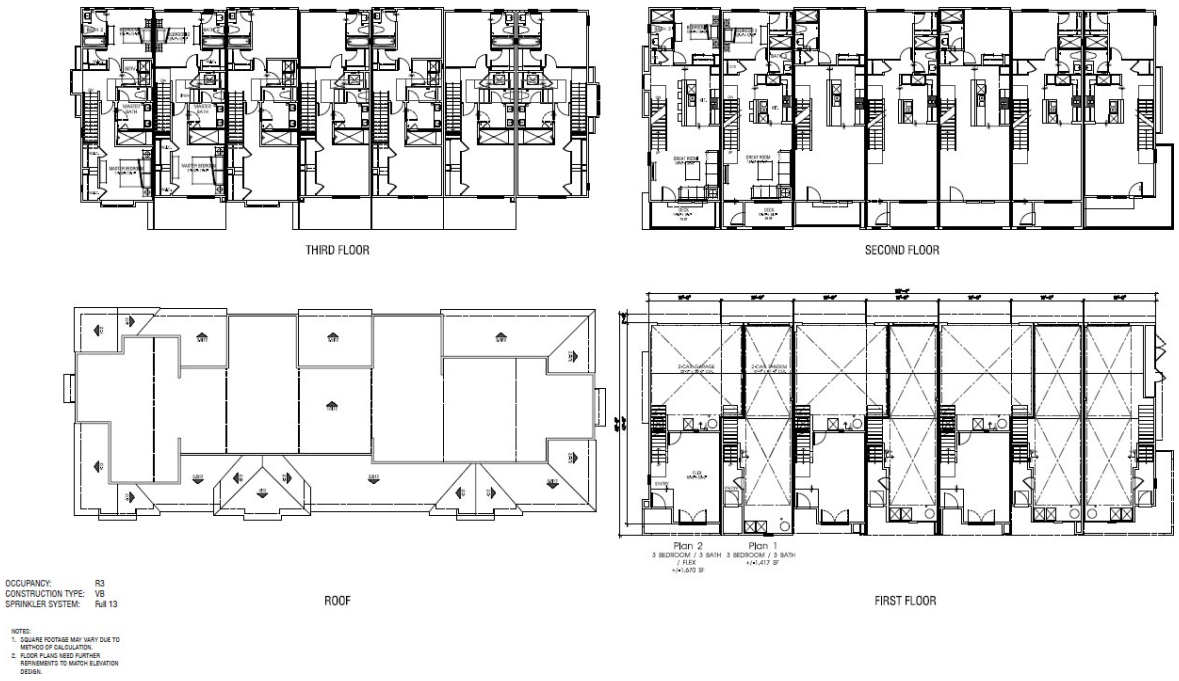
The architectural style of the building is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights.

The following is the breakdown of the product information, site plan, floor plan, elevations, and landscaping plan:

Product Information – Site 2 Transportation Center at 5555 Jillson Street			
Building Type	**Building Size**	**Unit Area**	**Unit Design**
6-plex	14,776 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
8-plex	19,355 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
9-plex	21,632 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
10-plex	23,983 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
11-plex	26,141 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,654 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space



CONCEPTUAL SITE PLAN - 5625 JILLSON STREET (TRANSPORTATION CENTER)



CONCEPT FLOOR PLAN

Building 600

Scheme 1

Refer to Landscape Drawings for wall, tree, shrubs and patio wall locations

Note: Artist's conception, colors, materials and application may vary.

Building 800

Scheme 3

Refer to Landscape Drawings for wall, tree, shrubs and patio wall locations

Note: Artist's conception, colors, materials and application may vary.

CONCEPT ELEVATIONS

TREES

BOTANICAL NAME	COMMON NAME
Quercus virginiana	Southern Live Oak
Ulmus parvifolia	Chinese Elm
Quercus suber	Cork Oak
Quercus virginiana	Southern Live Oak
Jacaranda mimosifolia	Jacaranda Tree
Koelreuteria bipinnata	Chinese Flame Tree
Pistacia chinensis	Chinese Pistache
Platanus acerifolia 'Columbia'	London Plane Tree
Lagerstroemia 'Natchez'	Crepe Myrtle
Magnolia grandiflora 'Little Gem'	Little Gem Magnolia
Archontophoenix cunninghamiana	King Palm
Lophostemon confertus	Brisbane Box
Archontophoenix cunninghamiana	King Palm
Phoenix dactylifera	Date Palm

SHRUBS AND GROUNDCOVER

BOTANICAL NAME	COMMON NAME
Heteromeles arbutifolia	Toyon
Ilex vomitoria 'Stokes'	Stokes Dwarf Yaupon Holly
Ligustrum j. 'Texanum'	Texas Privet
Lonicera japonica 'Halliana'	Hall's Japanese Honeysuckle
Podocarpus macrophyllus	Yew Pine
Rhaphiolepis i. 'Majestic Beauty'	Majestic Beauty Hawthorn
Rhaphiolepis i. 'Clara'	Indian Hawthorn
Rosa floribunda 'Iceberg'	Iceberg Rose
Salvia leucantha	Mexican Sage
Sanseveria trifasciata	Mother-in-Law's Tongue
Trachelospermum jasminoides	Star Jasmine

CONCEPTUAL LANDSCAPING PLAN
5625 & 5555 JILLSON STREET

The following aerial map shows the overall site plan for entire project:

Construction Characteristics

Because of COVID-19, and efforts to address community concerns, the construction schedule is to be determined. If approved, completion of all three sites shall conclude in December 2023. Construction activities within the Project area will consist of demolition, site preparation, grading, building, paving, and architectural coating.

Design and Compatibility

Chapter 19.47 and 19.19 of the CMC includes the development standards and design guidelines. The purpose of these standards is to protect and improve the environment and the appearance of the community, and to deter blighting and nuisance conditions. In particular, these guidelines address items such as, but not limited to, contextual design, landscaping, architectural treatments, and circulation.

The proposed residential units are compatible with existing developments surrounding the site and meets the City's site planning criteria and design guidelines set forth in the CMC. The building's architectural design will enhance the appearance of the area and will include a number of different measures to ensure compatibility. The proposed architectural style for the Site 1A – Harbor building is proposed as Agrarian with Composition Shingle roofs and stucco walls. Accent features include siding and board and batten at select locations, horizontal wood-like railing, vertical metal railing, wood post, trellis, and coach lights.

For the Site 1B & Site 2 – Jillson, the architectural style of the buildings is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights.

The Site 1A – Harbor site is bounded by the Brenda Villa Aquatic Center to the East, Warehouse to the West, and Single Family Residential to the North. The Site 1B – Jillson 1 and 2 sites are bounded by the City of Commerce City Hall and amenities to the East, a parking lot across Jillson Street to the South, warehouse to the North.

Several General Plan policies address the visual and aesthetic impacts of future development. In particular, Housing Policies 4.3 and 4.5.

Housing Policy 4.3 The City of Commerce will encourage quality construction in new residential development and require all properties to be maintained to the greatest extent possible.

Housing Policy 4.5 The City of Commerce will ensure that all new housing will have the same standards for design, construction, and maintenance found in housing that is more expensive.

PROJECT TRIP GENERATION

Harbor and Jillson Site Focused Traffic Study – prepared by TJW Engineering, Inc., January 15, 2020.

Projected trip generation for the proposed Project was based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition). Based on the proposed Project's intended use, the projected trip generation was determined using the Multifamily Housing (Mid-Rise) Land Use Code 221.

The Trip Generation Study showed that when all three Project site developments were combined, they would generate only 789 total vehicle trips per day. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection that has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic for all three Project sites would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore, no CO "hot spot" modeling was performed, and **no significant long-term air quality impact** is anticipated to local air quality with the on-going use of the proposed Project. The following table shows the projects trip generation:

PROJECTED TRIP GENERATION

Proposed Land Use	Qty	Unit	Daily Trips (ADTs)		AM Peak Hour					PM Peak Hour				
			Rate	Volume	Rate	In:Out Split	Volume			Rate	In:Out Split	Volume		
							In	Out	Total			In	Out	Total
Multi-Family Housing (221)	37.0	DU	5.44	201	0.36	26:74	4	10	14	0.44	61:39	10	7	17
Multi-Family Housing (221)	36.0	DU	5.44	196	0.36	26:74	3	10	13	0.44	61:39	10	6	16
Multi-Family Housing (221)	72.0	DU	5.44	392	0.36	26:74	7	19	26	0.44	61:39	20	12	32
Total				**789**			**14**	**39**	**53**			**40**	**25**	**65**

Notes: Rates from ITE Trip Generation (10th Edition, 2017); DU – Dwelling Unit

As shown in the table above, the proposed project is projected to generate a total of 53 AM peak hour trips, 65 PM peak hour trips, and 789 daily trips.

On-Site Parking

Section 19.21.040 – Number of Parking Space Required of the Commerce Municipal Code outlines the City's minimum parking requirements for various land use classifications. In this case, two parking spaces is required for each residential unit within a garage. The table below summarizes the minimum on-site parking requirements for the proposed project:

MUNICIPAL CODE ON-SITE PARKING REQUIREMENTS

Project Site	Total Units	Total Spaces Required	Total Spaces Provided
Site 1A – Harbor (5550 Harbor Street)	37	74	74
Site 1B – Jillson 1 (5625 Jillson Street)	31	62	62
Site 2 – Transportation Center (5555 Jillson Street)	65	130	130
TOTAL	133	**266**	**266**

As demonstrated above, the Project requires 266 parking spaces (two spaces per unit) and will provide 266 parking spaces (two parking spaces per unit within a garage). As such, the proposed number of parking spaces per unit will be met as proposed per the City's requirements as provided in Table 19.21.040A (Off Street Parking Requirements) of the CMC.

Besides the required off-street parking requirements per unit, the applicant proposed additional guest parking intermittently throughout the site. During the July public hearing, staff presented a guest-parking layout based on one open guest parking space for each, two residential units. At that time, the determination was based on a project that is considered a traditional multi-family housing project. After conferring with the developer, it was clarified, that the proposal as designed is considered a Dwelling, Single-Family ("SFR") Attached, similar to a townhome. Per Code, projects considered under the development standards of 19.47.030A (HOO), an Attached Single Family Dwellings could include attached townhomes, townhouses, courtyard, and/or cluster housing.

When reviewing the Zoning Code to determine guest parking, under both Chapters 19.21.040A and 19.47.030A, there appears to be an inconsistency between these two sections of the Code. Specifically, the HOO defines an SFR, as possibly being attached, but the parking requirement is silent on Attached SFR's. As such, it was

decided to apply the higher guest-parking requirement (66 spaces), that is typical of a multi-family housing project such as the one located at the Northeast corner of South Eastern and Harbor Street.

Although, an inconsistency within the Zoning may exist, both the applicant and staff believe the concern regarding guest parking has to be addressed with this proposal. Most recently and following the community meeting held on August 20, 2020, the plans were revised to increase the number of guest parking up to 54, where a total of 49 were previously proposed. In addition, the applicant will continue to work towards safeguards to ensure there are no negative impacts associated with guest parking. These measures will include CCR conditions, which among other things will include conditions that will limit property owners to the use and ownership of two personal vehicles per unit. This will ensure guest parking remains as such, and is not relegated to being used as overflow parking.

Along with the recommended changes, the applicant will explore other alternatives to ensure guest parking is provided at all times.

PROJECT DESCRIPTION FOR THE TENTATIVE TRACT MAPS

The applicant is requesting for approval on the following Tentative Tract Maps:

- Tentative Tract Map 82890 – creating one (1) lot for 37 residential units;
- Tentative Tract Map 82891 – creating one (1) lot for 31 residential units;
- Tentative Tract Map 82892 – creating one (1) lot for 65 residential units;

Tentative Tract Map 82890

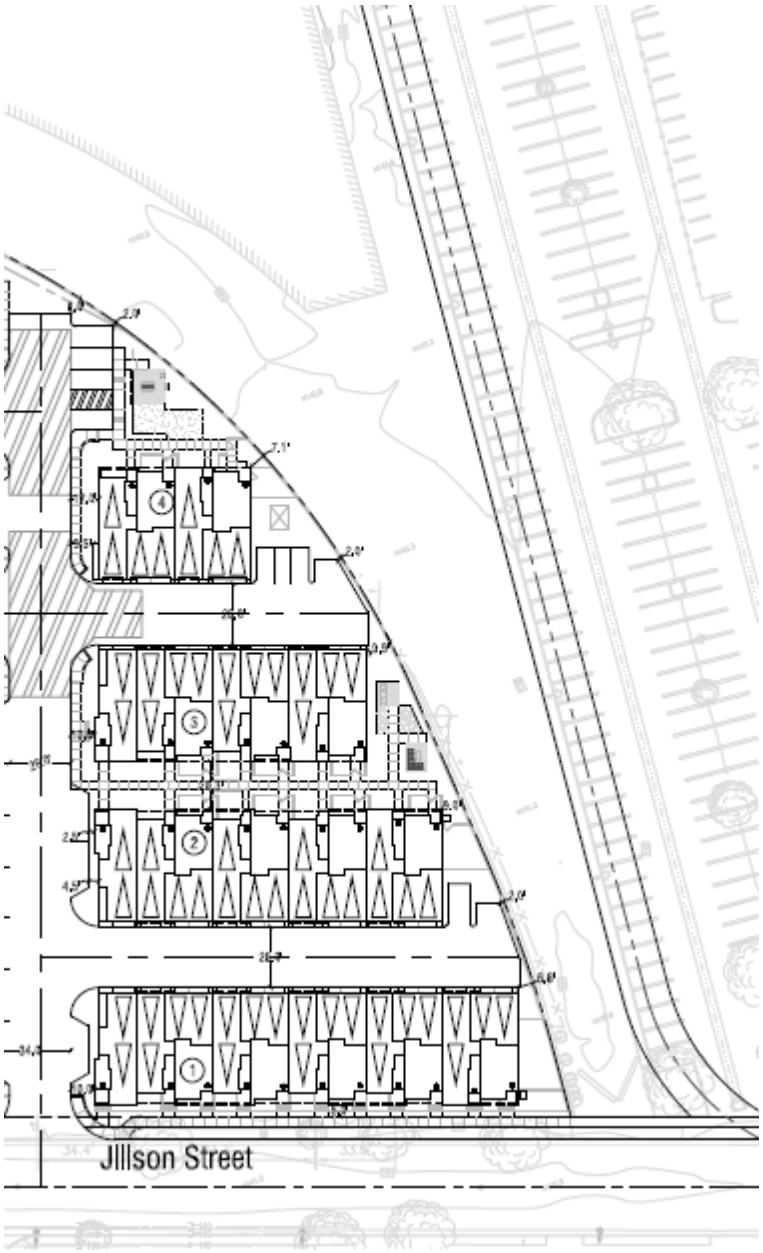
The Map creates a single 1.98-acre parcel for the development of 37 single-family attached residential units. Access is taken from the existing driveway on Harbor Street. The new parcel includes the area currently used for parking for the Brenda Villa Aquatic Center. Twelve (12) new parking spaces will be created to serve both the Aquatic Center and the development.

TENTATIVE TRACT MAP No. 82890

Tentative Tract Map 82891

The Map creates a single 1.33-acre parcel for the development of 31 single-family attached residential units. Access is taken from a single driveway off Jillson Street, which will serve both this map and TTM-82892. Three (3) private streets will serve the interior of the property.

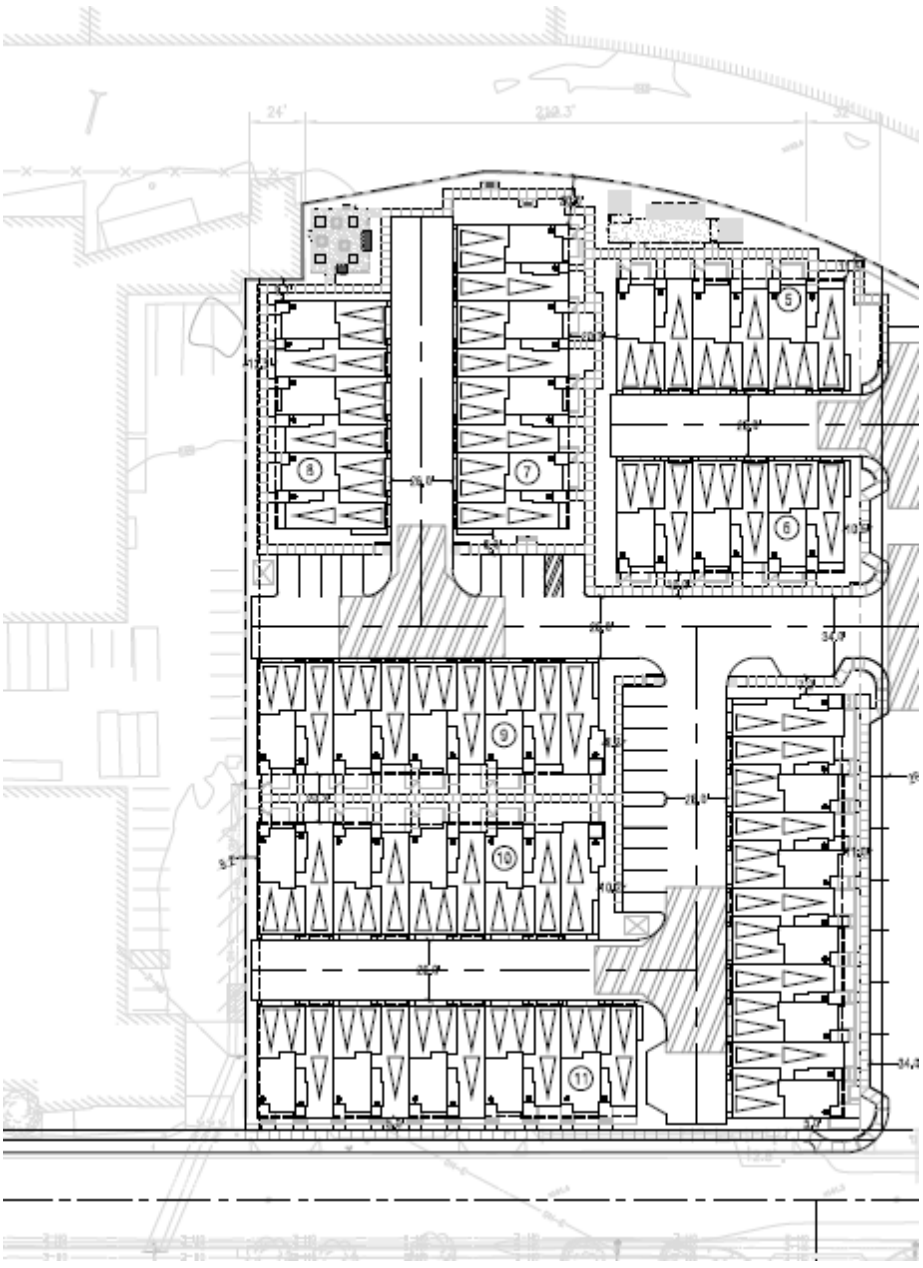
TENTATIVE TRACT MAP No. 82891



Tentative Tract Map 82892

The Map creates a single 2.43-acre parcel for the development of 65 single-family attached residential units. Access is taken from driveway serving TTM-82891 off Jillson Street. Four (4) private streets will serve the interior of the property.

TENTATIVE TRACT MAP No. 82892



The City's Engineer / Public Works Division and the Los Angeles County Fire Department have reviewed the proposed Tentative Parcel Map No. 82890, 82891, and 82892 and their conditions are part of the conditions of approval.

DEVELOPMENT AGREEMENT

The State of California enacted California Government Code Sections 65864 et seq. ("Development Agreement Statutes") to authorize municipalities to enter into development agreements with those having an interest in real property to strengthen the public planning process, encourage private participation in comprehensive planning, and reduce the economic risk of development in connection with the development of real property within their jurisdiction

The purpose of the Development Agreement Statutes is to authorize municipalities, in their discretion, to establish certain development rights in real property for a period of years regardless of intervening changes in land use regulations, to vest certain rights in the Owner, and to meet certain public purposes of the local government.

In this case, the applicant has worked closely with the Department to ensure parameters are in place to ensure an agreement will cover the development of the site in compliance with the provisions as set forth in the Housing Opportunity Overlay Zone (HOO).

UPDATES FOLLOWING JULY AND AUGUST PUBLIC HEARINGS.

On August 20, 2020, Planning staff, at the direction of the Planning Commission held a virtual meeting to discuss this item. The highest total number of participants was 20. Questions and Comments revolved around, affordability, density, sale versus rental, and parking. Other minor comments included discussion on window placement, location of utilities.

Parking was one of the biggest concerns raised both at the Planning Commission meeting in July as well as the Community Meeting in August. As discussed herein, off-street parking has always been provided for each residential unit as required per Code. Furthermore, conditions will be included in this recommendation which will limit the number of vehicles a person may be able to place on the property. This will ensure that guest parking is always available. In reference to the loss of parking for the Aquatorium, staff believes the remaining parking areas within the Rosewood Park area should be able to serve the facility.

During the August PC meeting, staff informed the Commission of the enhancements made to address the parking concerns, primarily, with the adjustment of the plans to provide additional guest parking, as well as placing restrictions on the number of vehicles that may be under the ownership of those living within the proposal. Following additional testimony and dialogue, direction was given to staff to consider additional enhancements to address the parking as well as study any possibility to provide affordable units.

Following the August hearing, staff was in communication with the applicant about studying the possibility of providing an affordable component to the proposal. The results of the discussion yielded good dialogue about potentially dedicating three units as affordable. In order to further pursue this, staff will be required to work with the applicant to revise the Agreement of Purchase and Sale and Escrow with the City Council in order to memorialize the discussion. Therefore, staff is adding a condition (NO. 45) that the applicant shall work with staff to study and provide for affordable housing to the maximum extent feasible.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Environmental analysis was conducted according to the California Environmental Quality Act (CEQA). The analysis provided in the initial study indicates that the proposed project will not result in any unmitigable significant adverse impacts. The initial study determined that a mitigated negative declaration should be prepared for the subject project. Mitigation measures focus on the following areas: Aesthetics, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials, Noise, Public Services, Transportation, Tribal Cultural Resources, and Wildfire. Please see the attached CEQA document for complete details on the analysis and subsequent mitigation measures prepared for the project.

The mitigation measures are part of the Mitigation Monitoring Program and have been made part of the approval of this project. The applicant confirmed that the project description was accurate and agreed to all mitigation measures. A Notice of Intent to Adopt was submitted and filed. No State responsible agencies were identified and as a result, no Clearinghouse posting was required. Noticing was posted and published as required under the City's Municipal Code. Additional information related to the CEQA process and mitigation measures are included as attachments to this report.

The Mitigation Monitoring Program (MMP) for the subject project has been prepared pursuant to the requirements of Public Resources Code §21081.6 which, among other things, states that when a governmental agency adopts or certifies a CEQA document that contains the environmental review of a proposed project, "The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

The City of Commerce is the lead agency for the project, and is therefore, responsible for administering and implementing of the MMP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project.

The MMP includes the following: (1) mitigation measures that will either eliminate or lessen the potential impact of the project; (2) the monitoring milestone or phase during which the measure shall be complied with or carried out; and (3) the enforcement agency responsible to monitor mitigation measure compliance.

The MMP will be in place through all phases of a project including project design (preconstruction), project approval, project construction, and operation (both prior to

and post-occupancy). The City will ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The MMP is attached to this report.

CONCLUSION:

Staff believes the necessary findings can be made to approve this Plot Plan to allow the development of 133 single-family attached residential units on three parcels to be known as Rosewood Village. It will be built in three phases, as described below. Phase 1 of the Project will be the Site 1A – Harbor (5550 Harbor Street) location. Phase 2 will be the Site 1B – Jillson 1 (5625 Jillson Street) location, and the Site 2 – Transportation Center (5555 Jillson Street) location will be Phase 3. Also, as demonstrated in the building analysis, the overall building layout and design will meet the minimum building requirements as set forth in the Zoning Ordinance. As analyzed, the proposal will not trigger any need for variances or will be inconsistent with the intent of the zoning code. As such, a Residential Land Use in this area of the City is consistent with other permissible activities within the residential zone.

Therefore, staff recommends that the Planning Commission approve 1) adopt the Mitigated Negative Declaration and Mitigation Monitoring & Reporting Program 2) adopt the required findings prepared by staff, and 3) conditionally approve Plot Plan No. 995, and Tentative Tract Map 82890, 82891 & 82892 subject to the conditions content in this staff report, and 4) to acknowledge and recommend to the City Council for the approval of the Development Agreement – covering the details of the City's sell of the land known as Assessor's Parcel Numbers (APN) 6335-025-902, 903, 905, and 906, to City Ventures for the development of 133 single-family attached dwelling units.

Prepared by: Sonia S. Griego
Associate Planner

Reviewed by: Jose D. Jimenez
Director of Economic Development and Planning

ATTACHMENT A
SPECIFIC FINDINGS FOR PLOT PLAN NO. 995

The following finding can be made, regarding the mandatory findings of significance set forth in Section 15065 of the CEQA Guidelines, based on the results of the environmental assessment:

1. The approval and subsequent implementation of the proposed project *will not* have the potential to degrade the quality of the environment.

2. The approval and subsequent implementation of the proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.

3. The approval and subsequent implementation of the proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.

4. The approval and subsequent implementation of the proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

In addition to the above findings pursuant to Commerce Municipal Code Section 19.39.680, approval or disapproval of any Site Plan application shall be based upon the following factors and principles:

1. **Compliance with all applicable provisions of this Title 19.** *The proposed 133 single-family attached residential units, with mitigation measures, will comply with all applicable requirements of the Commerce Municipal Code. The proposed use is one that is permitted within the HOO (Housing Opportunity Overlay)/M-2 (Heavy Industrial) Zone, the purpose of which is to provide land suitable for residential uses. The requirements of the zone are intended to provide safeguards and to establish adequate buffer distances between uses that pose potentially adverse public health, safety, and welfare impacts.*

2. **Suitability of the site for the particular use or development intended.** *The site is located in the HOO/M-2 Zone, which allows for the residential units uses in the City. The site was previously developed with industrial use and the surrounding neighborhood is characterized by similar uses and also surround by residential uses and public facilities. The intent of the Housing Opportunity/Heavy Industrial zone is to concentrate in bringing more residential uses; while at the same time ensuring the availability of needed public services. The proposed residential units do not violate any provisions of the Commerce Municipal Code, including lot coverage, floor area and*

setbacks requirements. The project sites will accommodate all parking on-site therefore; the site is suitable for the proposed development.

3. **Physical layout of the total development, including the application of prescribed development standards. The project shall be so arranged to further the policies of the General Plan and zoning regulation including, but not limited to, avoiding traffic congestion, ensuring the protection of public health, safety, and general welfare, and preventing adverse effects on neighboring properties.** *The proposed project will further the policies in the Commerce General Plan. The site has a "Housing Opportunity Overlay" land use designation, which is intended to support the uses such as that being proposed. Adequate safeguards will be provided to ensure the protection of the public health, safety, and welfare.*

4. **Consistency with all elements of the General plan.** *General Plans are required to not only be consistent with a City's zoning ordinance, but they must also be internally consistent. Therefore, individual elements must be consistent with one another. If a project is consistent with one element of a General Plan, it should therefore be consistent with the rest of the document. The subject project includes consistency with following policies in the Housing Element of the General Plan:*

    - Housing Policy 4.3 - The City of Commerce will encourage quality construction in new residential development and require all properties to be maintained to the greatest extent possible.

    - Housing Policy 4.5 - The City of Commerce will ensure that all new housing will have the same standards for design, construction, and maintenance found in housing that is more expensive.

    The abovementioned policies, along with other policies and elements identified in the General Plan will help contribute to an orderly pattern of development in the City, while helping to contribute new housing to the City.

5. **Suitability and functional development design; however, such approval shall be interpreted to require a particular style or type of architecture.** *The project was designed to meet the City's development standards, including those related to floor area and lot coverage. The project was also evaluated to ensure it met the City's site planning criteria and design guidelines. CEQA analysis of the project included a review of functionality measures of the proposal, including circulation and access. The project meets the intent and standards set forth in the Commerce Municipal Code; therefore, the proposed residential units are suitable for the project site and its surroundings.*

INITIAL STUDY (IS) & MITIGATED NEGATIVE DECLARATION FOR THE ROSEWOOD VILLAGE RESIDENTIAL PROJECT

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** Development Agreement
Tentative Tract Map 82890
Tentative Tract Map 82891
Tentative Tract Map 82892
Demolition of Existing Buildings

2. **Project Title:** Rosewood Village Residential Project (the "Project")

3. **Public Comment Period:** June 29, 2020 – July 20, 2020

4. **Lead Agency:**
City of Commerce
Sonia Griego, Economic Development & Planning
2535 Commerce Way
Commerce, CA 90040
(323) 722-4805 Ext. 2346
soniag@ci.commerce.ca.us

5. **Prepared By:**
Diane Jenkins, AICP
McKenna Lanier Group, Inc.
(909) 519-8887
Diane@McKennaLanier.com

6. **Project Sponsor:**

Applicant/Developer	Property Owner
Kim Prijatel Senior Vice President of Development City Ventures 3121 Michelson Drive, Suite 150 Irvine, CA 92612 (949) 258-7540 kPrijatel@cityventures.com	City Ventures 3121 Michelson Drive, Suite 150 Irvine, CA 92612 (949) 258-7555

7. **Project Location:** The Project consists of three parcels (or sites) located at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street. The sites are generally bounded by Harbor Street to the North, Commerce Way to the East, Jillson Street to the South, and East Eastern Avenue to the West, in the City of Commerce, County of Los Angeles, California, as shown in Figure A – Aerial. The site is located in an un-sectioned portion Township 3 South, Range 13 West, as shown on the Los Angeles, California 7.5-minute U.S. Geological Survey (USGS) topographic quadrangle map. It is comprised of Tax Assessor parcel numbers 6335-025-902, 903, 905, and 906.

8. **General Plan:** Housing Opportunity Area

This designation applies to specific industrial properties and permits the replacement of manufacturing uses for residential development. At such time the property owner determines industrial uses are no longer economically viable, the property must transition to residential uses. The permitted residential development densities range from 0 to 27 units per acre, yielding a population density of approximately 103 persons per acre. The development standards for the industrial uses correspond to those of the Industrial land use designation (see Figure B – Existing General Plan).

9. **Zoning:** M-2 – Heavy Industrial

The purpose of the M-2 zone is to provide land suitable for heavy industrial uses. This zone is also the only zone where adult businesses and adult entertainment enterprises may be located in the City. The requirements of the zone are intended to provide safeguards and to establish adequate buffer distances between uses that pose potentially adverse public health, safety, and welfare impacts and land uses in adjacent, more restrictive zone districts (see Figure C – Existing Zoning).

The Housing Opportunity Overlay Zone (HOO) is an overlay zone to be used only in conjunction with the underlying heavy manufacturing (M-2) zone. The HOO area applies to approximately forty-four acres within the Rosewood Planning Area. It is generally bounded by Harbor Street on the north, the Jillson Street on the south, Strong Avenue on the west, and with no formal boundary on the east. The eastern boundary is the Commerce Civic Center, Aquatorium, and Rosewood Park, as depicted in the figure below.

HOUSING OPPORTUNITY OVERLAY ZONE

10. **Surrounding Land Uses and Setting:**

	Land Use	General Plan	Zoning
Project Site	**Vacant**	**Medium Density Residential**	**C-L – Limited Commercial & P – Automobile Parking**
Site 1A -- Harbor Site	**City of Commerce Building for Office and Storage**	**Housing Opportunity**	**M2 – Heavy Industrial**
North	Single-Family Residential and Rosewood Park Elementary School	Low-Density Residential Public Facilities	R1 – Single-Family Residential PF – Public Facility
South	Hampton Forge, LTD	Housing Opportunity	M2 – Heavy Industrial
East	City of Commerce City Hall and City Amenities	Public Facilities	PF – Public Facility
West	Gilbert Properties Warehouse	Housing Opportunity	M2 – Heavy Industrial
Site 1B – Jillson 1 & Site – Transportation Center	**City of Commerce Transportation Center, Office and Warehouse Storage Buildings**	**Housing Opportunity**	**M2 – Heavy Industrial**
North	Hampton Forge, LTD	Housing Opportunity	M2 – Heavy Industrial
South	Parking Lot	Commercial	C/M1 – Commercial Manufacturing
East	City of Commerce City Hall and City Amenities	Public Facilities	PF – Public Facility
West	Signature Flexible Packaging	Housing Opportunity	M2 – Heavy Industrial

11. **Description of the Site and Project:**

Environmental Setting

The Project site consists of three (3) developed sites described below. Regionally, the subject sites are located in the Peninsular Ranges geomorphic province. The Peninsular Range province makes up the southwest portion of southern California, where major right-lateral active fault zones predominately trend northwest to southeast. The site is composed of plutonic and metamorphic rock, with lesser amounts of Tertiary volcanic and sedimentary rock, Quaternary drainage in-fills, and sedimentary veneers.

Site 1A – Harbor (5550 Harbor Street) is irregular-shaped and approximately 1.98-acres (including the parking area of the Brenda Villa Aquatic Center). The site is flat and currently developed with one and one-half story, 27,376-square-foot, light industrial, warehouse, and attached office building built in 1956 and an asphalt parking lot associated with the Aquatic Center. Prior to the mid-1940s, the project area was used for agricultural orchards. A former railroad spur was located adjacent to the southerly property line and is now an alley. The site is bounded to the north by Harbor Street, to the west by a commercial warehouse structure, to the east by the Brenda Villa Aquatic Center, and to the south by an alley. There are power poles on the northern and western boundaries.

Elevations onsite range between approximately 146-feet to 143-feet above mean sea level (msl) with a relatively low point toward the south. The site generally surface flows southeasterly with no signs of existing storm drain inlets on the site. There is an existing 66" Reinforced Concrete Pipe (RCP) Los Angeles County Flood District (LACFCD) storm drain located 8-feet north of the centerline of Harbor Street, flowing easterly. It joins an existing 12' wide by 7'-6" deep reinforced box culvert (RCB), flowing southeasterly in a 20' easement along the easterly property line. Both drains are shallow, with only a few feet of cover.

Site 1B – Jillson 1 (5625 Jillson Street) is irregular-shaped and approximately 1.33-acres. The site is flat and currently developed with a one and one-half story, 19,629-square-foot, light industrial, warehouse and attached office building constructed in 1949 and associated asphalt parking area, which is also used as a transitional storage area for miscellaneous household debris. A review of aerial photos indicates that the property was vacant with a railroad right-of-way associated with the Atchison Topeka Railroad heading onto the southern portion of the property from Jillson Street. The railroad right-of away was built around 1936. Then in 1949, the current building was built. The site is bounded to the north and east by railroad tracks, to the west by Site 2 – Transportation Center, and to the south by Jillson Street.

The site generally sheet flows southerly toward Jillson Street. There is an existing Los Angeles County Flood Control District (LACFCD) 12' wide by 7'-6" deep reinforced box culvert (RCB) flowing southeasterly in a 20' easement offsite, along the easterly line of the existing abandoned railroad spur and extending northwesterly along the existing City parking lot. The RCB turns and extends easterly in Jillson Street. The RCB is shallow, with only a few feet of cover. There is an existing catch basin located on the northerly curb line of Jillson Street near the eastern boundary of the site. This catch basin connects to the existing RCB, as described.

Site 2 – Transportation Center (5555 Jillson Street) is rectangular-shaped and approximately 2.43-acres. The site is developed with the City of Commerce Transportation Center office building and a two-story parking structure with a ramp built in 1997. The first floor of the parking structure is used for bus parking and maintenance, which includes a dump station for sewage in the northeastern corner, and a bus wash in the southeastern corner. The northern portion of the on-site building is used for automobile service. It includes two in-ground hydraulic lifts, an alignment pit, four-post aboveground lifts, two aboveground scissor lifts, and an in-ground wash clarifier in the western portion of the building, which is connected to a smaller in-ground clarifier located in the eastern portion of the building. A three-stage clarifier is situated in the southeastern driveway, which is connected to the bus wash located in the northeastern portion of the Property. A review of aerial photos indicates that the property was vacant until around 1936 when a railroad right-of-way associated with the Atchison Topeka Railroad was built heading onto the northern portion of the property from Jillson Street. Then in 1952/1953, a structure and parking area were built. Lastly, by 2003 the 1952 structure was demolished, and the existing building and parking structure were added. The site is bounded to the north by railroad tracks, to the east by proper Site 1B – Jillson 1, to the west by commercial warehouse structure, and to the south by Jillson Street.

The site generally sheet flows southerly toward Jillson Street. There is an existing Los Angeles County Flood Control District (LACFCD) 12' wide by 7'-6" deep

reinforced box culvert (RCB) flowing southeasterly offsite, along the easterly line of the existing abandoned railroad spur and extending northwesterly along the existing City parking lot. The RCB turns and extends easterly in Jillson Street. The RCB is shallow, with only a few feet of cover. There is an existing catch basin located on the northerly curb line of Jillson Street near the eastern boundary of the site. This catch basin connects to the existing RCB, as described.

Project Description

The Project is the development of 133 single-family attached residential units on three parcels to be known as Rosewood Village. It will be built in three phases, as described below. Phase 1 of the Project will be the Site 1A – Harbor (5550 Harbor Street) location. Phase 2 will be the Site 1B – Jillson 1 (5625 Jillson Street) location, and the Site 2 – Transportation Center (5555 Jillson Street) location will be Phase 3.

Site 1A – Harbor (5550 Harbor Street) The development proposes the construction of 37 single-family attached residences with private garages, private drive aisles, sidewalks, guest parking areas, and common landscaped areas. The buildings are proposed to be designed. The Project site will be accessible with an entrance/exit along Harbor Street.

The housing product includes five (5) three-story buildings, comprised of four (4) eight-plex buildings and one (1) five-plex building. There are two-floor plans, ranging in size from 1,394-square-feet to 1,670-square feet. Each home will have a two-car garage, one with tandem parking, and the other with side by side parking. The living space on the second level will benefit from an outdoor space provided by a private balcony.

The architectural style of the building is proposed as Agrarian with Composition Shingle roofs and stucco walls. Accent features include siding and board and batten at select locations, horizontal wood-like railing, vertical metal railing, wood post, trellis, and coach lights.

Product Information			
Building Type	**Building Size**	**Unit Area**	**Unit Design**
8-plex	18,988 sq. ft.		
Plan 1		1,394 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
5-plex	11,858 sq. ft.		
Plan 1		1,394 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space

Site 1B – Jillson 1 (5625 Jillson Street) The development proposes the construction of 31 single-family attached residences with private garages, private drive aisles, sidewalks, guest parking areas, and common landscaped areas. The Project site will be accessible with an entrance/exit along Jillson Street. An extension

of drive aisles, guest parking areas, and sidewalk are proposed on a separate Tract Map 82892 that connects to the private drive aisle of the westerly boundary that sheet flows toward the proposed Project site. The acreage of this extension will be included in the calculation of sizing the catch basin and detention system.

The housing product includes four (4) three-story buildings, comprised of one (1) four-plex building, one (1) seven-plex building, one (1) nine-plex building, and one (1) eleven-plex building. There are two-floor plans, ranging in size from 1,417-square-feet to 1,670-square feet. Each home will have a two-car garage, one with tandem parking, and the other with side by side parking. The living space on the second level will benefit from an outdoor space provided by a private balcony.

The architectural style of the building is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights.

Product Information			
Building Type	**Building Size**	**Unit Area**	**Unit Design**
4-plex	9,578 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
7-plex	16,829 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
9-plex	21,632 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
11-plex	18,791 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,654 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space

Site 2 – Transportation Center (5555 Jillson Street) The development proposes the construction of 65 single-family attached residences with private garages, private drive aisles, sidewalks, guest parking areas, and common and private landscaped areas. The Project site is an extension of the improvement of proposed Tract Map 82891, which will be accessible with an entrance/exit along Jillson Street. A portion of the drive aisles, guest parking areas, and sidewalks of the proposed Project site sheet flows on to Tract Map 82891 site that connects the private drive aisle of the easterly boundary. The acreage of this extension will be excluded in the calculation of sizing the catch basin and detention system.

The housing product includes eight (8) three-story buildings, comprised of three (3) six-plex buildings, one (1) eight-plex building, two (2) nine-plex buildings, one (1) ten-plex building, and one (1) eleven-plex building. There are two-floor plans, ranging in size from 1,417-square-feet to 1,670-square feet. Each home will have a two-car garage, one with tandem parking, and the other with side by side parking. The living space on the second level will benefit from an outdoor space provided by a private balcony.

The architectural style of the building is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights.

Product Information			
Building Type	**Building Size**	**Unit Area**	**Unit Design**
6-plex	14,776 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
8-plex	19,355 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
9-plex	21,632 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
10-plex	23,983 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,670 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space
11-plex	26,141 sq. ft.		
Plan 1		1,417 sq. ft.	3 bedrooms 3 baths
Plan 2		1,654 sq. ft.	3 bedrooms 3 baths 20 sq. ft. flex space

The Project includes discretionary approvals as follows:

- Development Agreement – covering the details of the City's sell of the land;
- Tentative Tract Map 82890 – creating one (1) lot for 37 residential units;
- Tentative Tract Map 82891 – creating one (1) lot for 31 residential units;

- Tentative Tract Map 82892 – creating one (1) lot for 65 residential units; and
- Demolition of Existing Buildings on all three sites.

Development Agreement

A development agreement is required and will provide the details of the City's sale of the land at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street known as Assessor's Parcel Numbers (APN) 6335-025-902, 903, 905, and 906, to City Ventures for the development of 133 single-family attached dwelling units.

Tentative Tract Map 82890

The Map creates a single 1.98-acre parcel for the development of 37 single-family attached residential units. Access is taken from the existing driveway on Harbor Street. The new parcel includes the area currently used for parking for the Brenda Villa Aquatic Center. Twelve (12) new parking spaces will be created to serve both the Aquatic Center and the development.

Tentative Tract Map 82891

The Map creates a single 1.33-acre parcel for the development of 31 single-family attached residential units. Access is taken from a single driveway off Jillson Street, which will serve both this map and TTM-82892. Three (3) private streets will serve the interior of the property.

Tentative Tract Map 82892

The Map creates a single 2.43-acre parcel for the development of 65 single-family attached residential units. Access is taken from driveway serving TTM-82891 off Jillson Street. Four (4) private streets swill serve the interior of the property.

Construction Characteristics

The Project is anticipated to begin construction September 2020 with completion of all three sites occurring in December 2023. Construction activities within the Project area will consist of demolition, site preparation, grading, building, paving, and architectural coating.

Drainage for the three sites is proposed as follows:

Site 1A – Harbor (5550 Harbor Street) Proposed site drainage will be conveyed as surface flow to proposed private drive aisles, as well as to a series of area drains connecting to storm drain treatment facilities. Surface flow to the proposed private drive aisles will be captured by two (2) proposed curb-inlet catch basins. Low flows will be directed to the proposed Modular Wetlands System (MWS) Biofiltration vaults for water quality treatment. The treated runoff will then be conveyed to a proposed underground detention system prior to discharging to the existing Los Angeles County Flood Control District (LACFCD) facility. During more significant storm events, stormwater runoff will be conveyed to a proposed underground detention system. The system is equipped with an orifice to mitigate the peak discharge rate to the allowable peak flowrate (Allowable Q) provided by the Los

Angeles County Department of Public Works (LACDPW). For emergency overflow, the runoff will bubble out of the lowest proposed catch basin located at the southeast corner of the Project site and outlet onto the open space towards Jillson Street.

Site 1B – Jillson 1 (5625 Jillson Street) Proposed site drainage will be conveyed as surface flow to proposed private drive aisles, as well as to a series of area drains connecting to storm drain treatment facilities. Surface flow to the proposed private drive aisles will be captured by the proposed curb-inlet catch basins. Low flows will be directed to the proposed Modular Wetlands System (MWS) Biofiltration vaults for water quality treatment. The treated runoff will then be conveyed to a proposed underground detention system prior to a pump station, where runoff gets discharge to a parkway drain toward the existing LACFCD facility catch basin on Jillson Street. During more significant storm events, stormwater runoff will be conveyed to a proposed underground detention system. The system is equipped with an orifice to mitigate the peak discharge rate to the allowable peak flowrate (Allowable Q) provided by the Los Angeles County Department of Public Works (LACDPW). For emergency overflow, the runoff will bubble out of the lowest proposed catch basin located at the southwest corner of the Project site and outlet onto Jillson Street.

Site 2 – Transportation Center (5555 Jillson Street) Proposed site drainage will be conveyed as surface flow to proposed private drive aisles, as well as to a series of area drains connecting to storm drain treatment facilities. Surface flow to the proposed private drive aisles will be captured by the proposed curb-inlet catch basins, and three (3) proposed drop-inlet catch basins. Low flows will be directed to the proposed Modular Wetlands System (MWS) Biofiltration vaults for water quality treatment. The treated runoff will then be conveyed to a proposed underground detention system prior to a pump station, where runoff gets discharge to a parkway drain toward the existing LACFCD facility catch basin on Jillson Street. During more significant storm events, stormwater runoff will be conveyed to a proposed underground detention system equipped with an orifice to mitigate the peak discharge rate to the allowable peak flowrate (Allowable Q) provided by the Los Angeles County Department of Public Works (LACDPW). For emergency overflow, the runoff will bubble out of the proposed catch basin located at the southeast corner of the Project site and outlet onto Jillson Street.

Although the three properties are relatively flat, the Project will export approximately 235 cubic yards of dirt in approximately 17 truckloads for Site 1B – Jillson 1 (5625 Jillson Street) and 355 cubic yards of dirt in approximately 25 truckloads for Site 2 – Transportation Center (5555 Jillson Street). Site 1A – Harbor (5550 Harbor Street) will balance the dirt on site. All existing street improvements on Harbor Street and Jillson Street will be protected in place, except for the utility poles. The two utility poles adjacent to the site may be protected in place, relocated, or undergrounded depending on further study. Any additional required street improvements (curb, gutters, streetlights, street trees, sidewalks, fire hydrants, etc.) will be installed as necessary. The Project includes preliminary grading, drainage, and water quality management plans.

Demolition of Existing Buildings

The Project includes the demolition of all structures on the three sites.

Site 1A – Harbor (5550 Harbor Street) contains one structure (City building used for office and storage) and a parking area associated with the Brenda Villa Aquatic Center to the east. This building was constructed in 1956 in the Late Moderne style. The building envelope is framed in metal with cast concrete walls on a concrete foundation, and flagstone is used on the primary façade as an accent material. The City's existing radio tower will be removed as it is no longer in use. The data vault beneath the tower will be relocated to the parkway in Harbor Street, adjacent to the Aquatic Center.

Site 1B – Jillson 1 (5625 Jillson Street) contains one structure (City building used as an office and storage) and parking area. The building exhibits elements representing a transitional, Streamline Moderne-to-Late Moderne style building. Additionally, there is a small, 455-square-foot vernacular metal corrugated storage building attached to the rear elevation that was added in 1970. The building envelope is framed in metal and primarily constructed of brick masonry in a running bond pattern with mortar, sitting on a concrete foundation.

Site 2 – Transportation Center (5555 Jillson Street) is developed with the City of Commerce Transportation Center and associated office building. A two-story parking structure is located in the northern portion of the Property. The first floor of the parking structure is used for bus parking and maintenance. This area includes a dump station for sewage in the northeastern corner and a bus wash in the southeastern corner. The northern portion of the on-site building is used for automobile service. It includes two in-ground hydraulic lifts, an alignment pit, four-post aboveground lifts, two aboveground scissor lifts, and an in-ground wash clarifier in the western portion of the building, which is connected to a smaller in-ground clarifier located in the eastern portion of the building. A three-stage clarifier is located in the southeastern driveway, which is connected to the bus wash located in the northeastern portion of the Property.

12. **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 5097.96 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.

Notification of AB 52 consultation on the Project commenced on April 29, 2020, with the two tribes that have requested consultation with the City, the Gabrieleño Band of Mission Indians – Kizh Nation and the Soboba Band of Luiseño Indians. Due to the COVID-19 pandemic, Governor Newsom enacted Executive Order N-54-20 on April 22, 2020, suspending tribal consultation timelines from 30-days to 60-days until June 22, 2020. Therefore, the tribal consultation timeline for this

Project ends on June 22, 2020, unless the Governor extends the order. At this time, neither tribe has requested consultation on this Project.

13. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

a. California Water Services Company
b. Los Angeles County Flood Control District
c. Southern California Edison
d. Southern California Gas
e. Statewide Construction General Permit
f. Department of Toxic Substance Control

14. **Project Plans and Other Technical Studies Referenced in this Initial Study (Provided as Appendices):**

A. Site 1A – Harbor Proposal
B. Site 1B – Jillson 1 Proposal
C. Site 2 – Transportation Center Proposal
D. Jillson Site and Harbor Site Residential Development Air Quality and Greenhouse Gas Impact Study – prepared by MD Acoustics LLC, December 20, 2019
E. Phase 1 Cultural Resource Assessment for the Rosewood Village Residential Project – prepared by Applied EarthWorks, Inc., June 2020
F. Paleontological Technical Memorandum for the Rosewood Village Residential Project – prepared by Applied EarthWorks, Inc., April 13, 2020
G. Preliminary Geotechnical Investigation 5550 Harbor Street, 5625 Jillson Street and 5555 Jillson Street, Commerce 1A, 1B and 2 – prepared by Alta California Geotechnical Inc., October 21, 2019
H. Commerce A Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., February 11, 2019
I. Commerce B Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., February 5, 2019
J. Commerce 2 Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., April 1, 2019
K. Phase II Environmental Site Assessment Commerce A – prepared by Stantec Consulting Services, Inc., July 12, 2019
L. Phase II Environmental Site Assessment Commerce 2 – prepared by Stantec Consulting Services, Inc., July 12, 2019
M. Preliminary Hydrology Study TTM 82890 5550 Harbor Street – prepared by C&V Consulting, Inc., November 2019
N. Preliminary Hydrology Study TTM 82891 5625 Jillson Street – prepared by C&V Consulting, Inc., December 2019
O. Preliminary Hydrology Study TTM 82892 5555 Jillson Street – prepared by C&V Consulting, Inc., December 2019
P. Sewer Area Study TTM No. 82890 PC 3067 SMD Index 1915, 1916 – prepared by C&V Consulting, Inc., April 2020
Q. Sewer Area Study TTM No. 82891 PC 87-1 SMD Index 1916 – prepared by C&V Consulting, Inc., April 2020
R. Preliminary Low Impact Development (LID) Plan 5550 Harbor Street – prepared by C&V Consulting, Inc., December 2019

S. Preliminary Low Impact Development (LID) Plan 5625 Jillson Street – prepared by C&V Consulting, Inc., December 2019
T. Preliminary Low Impact Development (LID) Plan 5555 Jillson Street – prepared by C&V Consulting, Inc., December 2019
U. Jillson and Harbor Sites Residential Development Noise Impact Study – prepared by MD Acoustics LLC, December 20, 2019
V. Harbor and Jillson Site Focused Traffic Study – prepared by TJW Engineering, Inc., January 15, 2020

15. **Acronyms:**

ACM -	Asbestos Containing Materials
ACCM -	Asbestos Construction Containing Materials
ADA -	American with Disabilities Act
ALUC -	Airport Land Use Commission
ALUCP -	Airport Land Use Compatibility Plan
AQMP -	Air Quality Management Plan
BMP -	Best Management Practice
CEQA -	California Environmental Quality Act
CMC -	Commerce Municipal Code
CMP -	Congestion Management Plan
DOSH -	Division of Occupational Safety and Health Administration
DTSC -	Department of Toxic Substance Control
DWR -	Department of Water Resources
EIR -	Environmental Impact Report
EOP -	Emergency Operations Plan
FEMA -	Federal Emergency Management Agency
FMMP -	Farmland Mapping and Monitoring Program
GIS -	Geographic Information System
GHG -	Greenhouse Gas
GP -	General Plan
HCM -	Highway Capacity Manual
HCP -	Habitat Conservation Plan
HOA -	Homeowners' Association
IS -	Initial Study
LACFCD -	Los Angeles County Flood Control District
LACDPW -	Los Angeles County Department of Public Works
LACSD -	Los Angeles County Sanitation District
LARWQCB -	Los Angeles Regional Water Quality Control Board
LBP -	Lead-Based Paint
LHMP -	Local Hazard Mitigation Plan
LID -	Low Impact Development
LOS -	Level of Service
LST -	Localized Significance Threshold
MM -	Mitigation Measure
MUSD -	Montebello Unified School District
MWD -	Metropolitan Water District
NCCP -	Natural Communities Conservation Plan
NPDES -	National Pollutant Discharge Elimination System
OEM -	Office of Emergency Services
OSHA -	Occupational Health and Safety Administration
OPR -	Office of Planning & Research, State

PEIR -	Program Environmental Impact Report
PW -	Public Works
RCP -	Regional Comprehensive Plan
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCE -	Southern California Edison
SCH -	State Clearinghouse
SWPPP -	Storm Water Pollution Prevention Plan
SWRCB -	State Water Resources Control Board
USFWS -	United States Fish and Wildlife
USGS -	United States Geologic Survey
VMT -	Vehicle Miles Traveled
WQMP -	Water Quality Management Plan

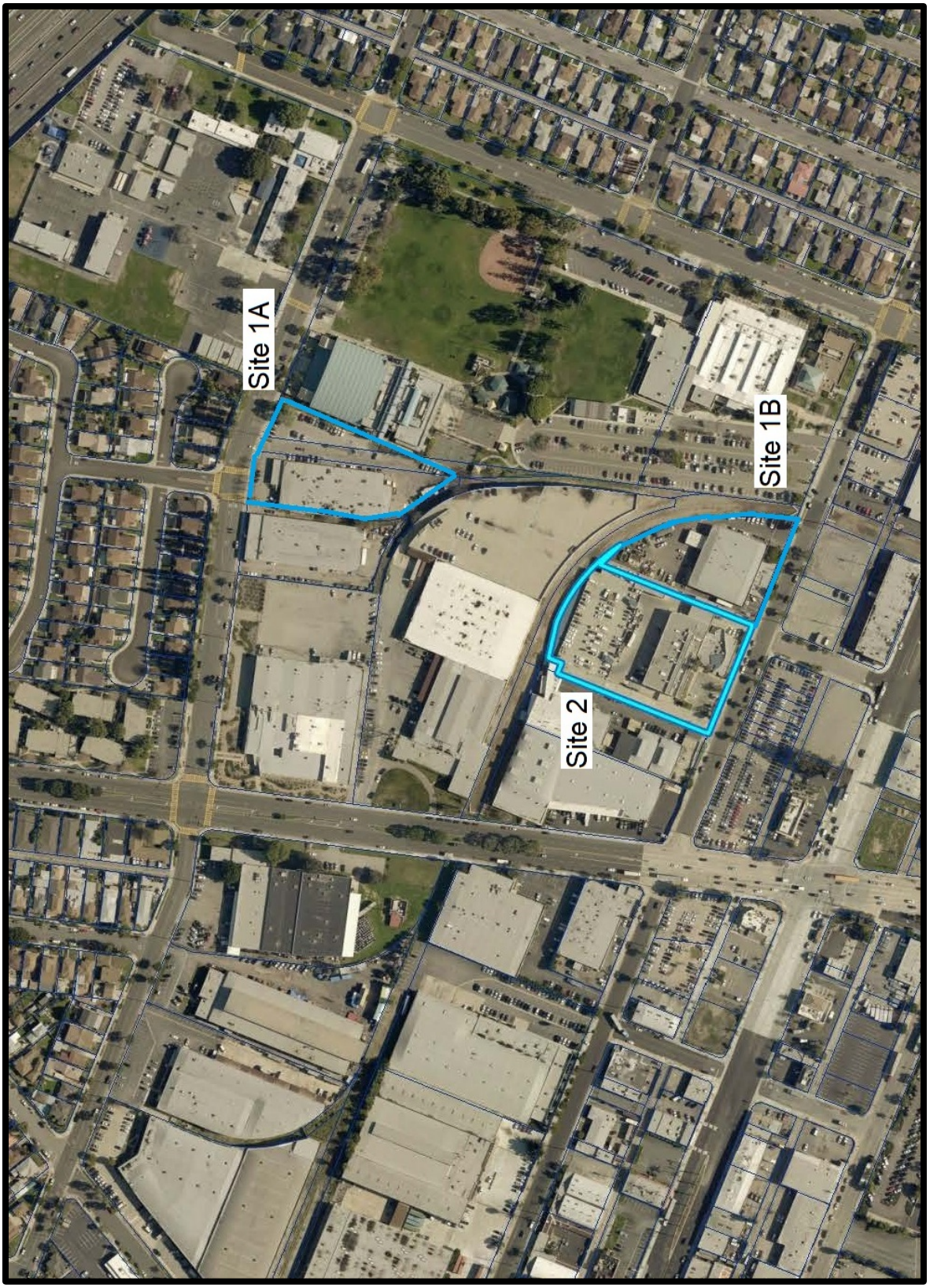


Figure A – Aerial Map

Figure B – General Plan

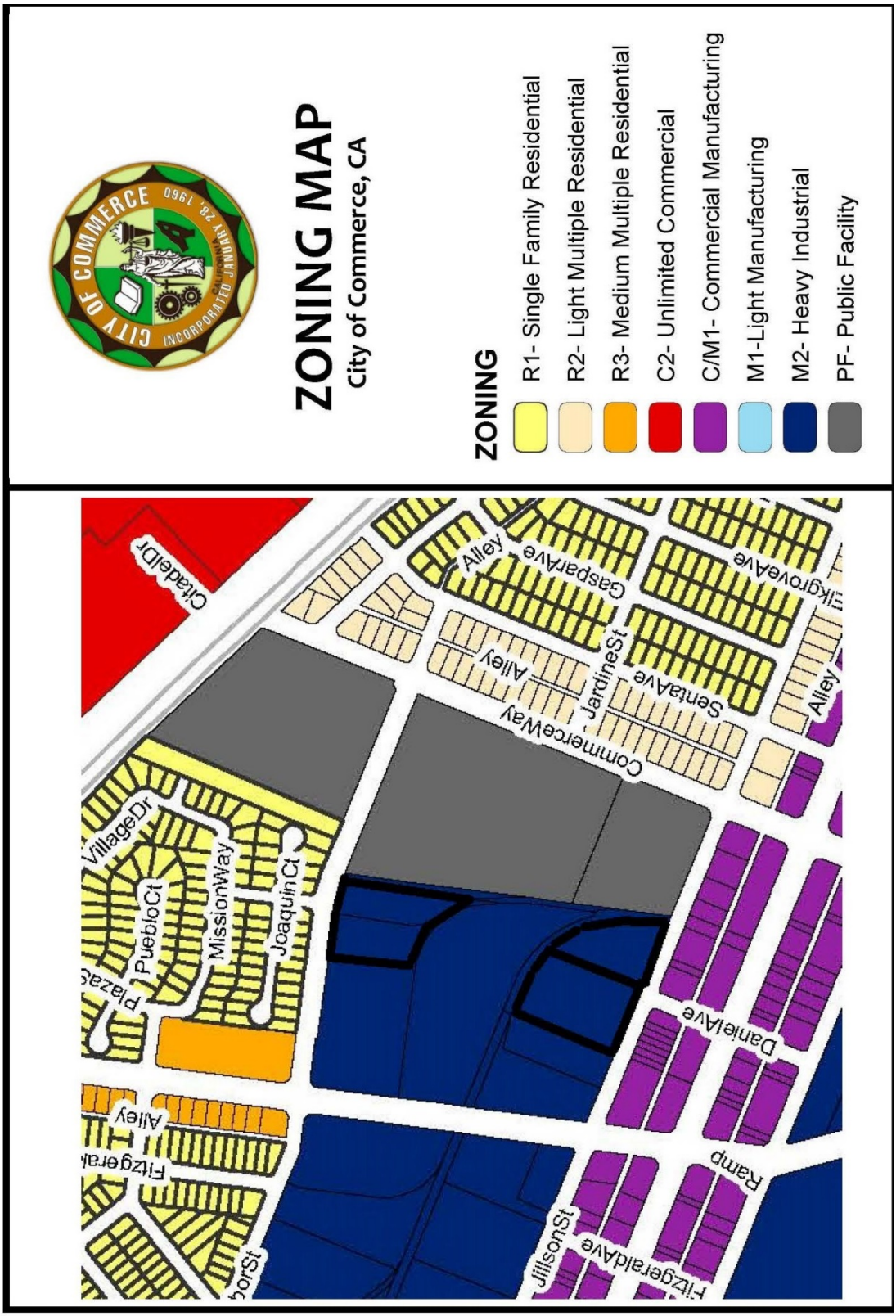


Figure C – Existing Zoning

5550 Harbor Street

Figure D – Photos

Site 1B – Jillson 1 (5625 Jillson Street)

Site 2 – Transportation Center (5555 Jillson Street)

Figure D – Photos

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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" 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
Sonia Griego, City Project Planner	City of Commerce
Printed Name	For

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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

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

3) Once the Lead 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 is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or another 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.

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.

ISSUES & SUPPORTING INFORMATION SOURCES:	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 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects **– Would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Response:

The City is located in the southerly portion of the Los Angeles basin. The City is fully developed, and there are no unique geologic features found in the Project Area. The San Gabriel Mountains and Montebello Hills are located to the north, The Puente Hills are located to the northeast, the Los Angeles River is located to the west, and the Rio Hondo River is located to the south. All three Project sites are relatively flat, currently developed with buildings, and are surrounded by urban development as described below.

Site 1A – Harbor (5550 Harbor Street) The development proposes the construction of 37 single-family attached residences in three five-story buildings, with private garages, private drive aisles, sidewalks, guest parking areas, and common landscaped areas. The architectural style of the building is proposed as Agrarian with Composition Shingle roofs and stucco walls. Accent features include siding and board and batten at select locations, horizontal wood-like railing, vertical metal railing, wood post, trellis, and coach lights.

Site 1B – Jillson 1 (5625 Jillson Street) The development proposes the construction of 31 single-family attached residences in four three-story buildings, with private garages, private drive aisles, sidewalks, guest parking areas, and common landscaped areas. The architectural style of the building is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights.

Site 2 – Transportation Center (5555 Jillson Street) The development proposes the construction of 65 single-family attached residences in eight three-story buildings, with private garages, private drive aisles, sidewalks, guest parking areas, and common and private landscaped areas. The architectural style of the building is proposed as Progressive Spanish with S-Tile roofs and stucco walls. Accent features will include bay windows at select locations, shaped stucco soffits, decorative corbels, vertical metal railing, and coach lights.

The Site 1A – Harbor site is bounded by the Brenda Villa Aquatic Center to the East, Hampton Forge. LTD to the South, Gilbert Properties Warehouse to the West, and Single Family Residential to the North. The Site 1B – Jillson 1 and 2 sites are bounded by the City of Commerce City Hall and amenities to the East, a parking lot across Jillson Street to the South, Signature Flexible Packaging to the West, and Hampton Forge Ltd to the North.

Several General Plan policies address the visual and aesthetic impacts of future development. In particular, Housing Policies 4.3 and 4.5.

Housing Policy 4.3 The City of Commerce will encourage quality construction in new residential development and require all properties to be maintained to the greatest extent possible.

Housing Policy 4.5 The City of Commerce will ensure that all new housing will have the same standards for design, construction, and maintenance found in housing that is more expensive.

The City has evaluated the Project against General Plan policies City standards. The Project has been found, as conditioned, to meet these policies and all standards of the City. Therefore, the Project will have a **less than significant impact,** directly, indirectly, or cumulatively to scenic vistas.

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

Response:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

There are no designated scenic highways or corridors are located in the City per the *City of Commerce General Plan Update Final Environmental Impact Report (FEIR)*. In addition, a review of the CalTrans Scenic Highways Program, it was determined that no state scenic highways exist in the City of Commerce.

City staff will ensure that the Project is designed consistent with the City's requirements and the surrounding area. Therefore, the Project will have a **less than significant impact,** directly, indirectly, or cumulatively, to scenic resources within a state or City designated scenic highway/corridor.

c) In non-urbanized 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?	☐	☐	☒	☐

Response:

The Project is located in an urbanized area and has been designed to meet all applicable zoning, General Plan requirements, and other City regulations governing scenic quality. Therefore, the Project will have a **less than significant impact,** directly, indirectly, or cumulatively, on the existing visual character.

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

Response:

Sources of light and glare in the City include street and parking area lighting, signage, building lighting, and vehicle headlights with a significant source of lighting in the City found in the rail yards that have security lighting.

Per the City's General Plan Update FEIR, lighting utilized for parking areas, security lighting, and lights within the structures, are the predominant source of light and glare in the City. It is noted in the FEIR that the degree of light and glare from new development, while likely to be comparable to current levels requiring evaluation on a project-by-project basis with the Sheriff's Department and the City possibly requiring approval of a detailed lighting plan for larger developments.

The Project's lighting will comply with Section 19.19.130 – Light and Glare of the City's Zoning Ordinance.

The property is adjacent to residential uses on the north. As such, light spillage could have an impact on these residential uses. Therefore, Mitigation Measure **MM AES-1** shall be applied to ensure light spillage does not impact the residential properties.

The proposed buildings are designed using a compatible color palette with the surrounding area, and the site will include landscaping. Therefore, glare from the buildings should be minimal. Mitigation Measure, **MM AES-2,** will ensure that glare is not a potential issue.

As designed, conditioned, and mitigated the impacts of lighting and glare will be **less than significant with mitigation,** directly, indirectly, and cumulatively.

MM AES-1: Prior to building permit issuance, the developer shall submit a photometric plan to meet the following requirements. The plan shall be submitted to the City for approval and shall be designed in compliance with Section 19.19.130 of the City's Zoning Ordinance and shall include the following:

- Outdoor lighting shall maintain a minimum of **one**-foot candle illumination for all parking and pedestrian areas. The plan must include details such as beam spreads and/or photometric calculations, location, and type of fixtures, and arrangement of

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

exterior lighting that does not create glare or hazardous interference to adjacent streets or properties.

MM AES-2: Prior to building permit issuance, the developer shall ensure that the design of the buildings shall reduce the number of reflective surfaces used in the construction to minimize new sources of glare. Exterior building materials shall use earth tone colors with a low-reflectance. Any bare metallic surfaces found on infrastructures such as pipes and poles shall be painted to minimize reflectance and glare.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
   - 19.19.130 – Light and Glare
4. CalTrans Scenic Highways -- https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

II. AGRICULTURE AND FOREST 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?	☐	☐	☐	☒

Response:

The subject site is "*not mapped*" on the Farmland Mapping and Monitoring Program. The "*not mapped*" designation means an area that falls outside of the California Department of Conservation soil survey.

The adjacent properties on all four sides are developed, making agricultural uses on the subject sites problematic. Development, particularly residential development, can make farming more difficult or costly due to conflicts between non-agricultural and agricultural activities. For example, residents may complain about noise, dust, odors, and low-flying aircraft used to dust or spray crops. Increased restrictions on agriculture processes and other aspects of encroachment on agricultural areas can lower productivity, increase costs, and otherwise impair agricultural operations. These sites are currently developed with buildings. It is noted that the site was used for light agriculture in 1923, which appears to have remained until approximately to the late 1940s and early 1950s. Therefore, the Project will have **no impact,** directly, indirectly, or cumulatively to farmland.

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

Response:

No agricultural activities are located within the City, nor does the City of Commerce General Plan provide for any agricultural land use designation. In addition, there are no soils in the City designated as Prime Farmland, Unique Farmland, or Statewide Importance. The proposed Project will not result in the conversion of any existing farmland to urban uses. In addition, there are no parcels within the City zoned for agricultural uses or under a Williamson Act contract. As a result, no impacts on farmland soils, agricultural zoning, or existing or future Williamson Act contracts. Therefore, the Project will have **no impact,** directly, indirectly or cumulatively, on zoning for agricultural use or on a Williamson Act contract.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?	☐	☐	☐	☒

Response:

In Southern California, including the City of Commerce, climate and topography limit the types and locations of forest lands and their potential for commercial or industrial timber utilization. Accordingly, there is no existing or currently proposed zoning of forest land, timberland, or Timberland Production Zones within the City. Therefore, the Project would not conflict with the existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, and the Project will have **no impact,** directly, indirectly or cumulatively.

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

Response:

There is no commercial forestry or timber production industry within the City. Therefore, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use, and the Project will have **no impact,** directly, indirectly or cumulatively.

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

Response:

As previously indicated, the Project site has not been used for agricultural purposes since the late 1940s or early 1950s. Due to the adjacent residential and manufacturing developments, agricultural uses on this site would be problematic. Therefore, the Project would not result in the conversion of farmland to non-agricultural use. It will have **no significant impact,** directly, indirectly, or cumulatively, to farmland or the non-agricultural use or conversion of forest land.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. California Department of Conservation Important Farmland Finder, accessed September 12, 2019

III. 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?	☐	☐	☒	☐

Response:

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed Project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the

proposed Project is are inconsistent, the lead agency may consider Project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land-use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

(2) Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

A. Criterion 1 - Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in this Air Analysis, neither short-term construction impacts nor long-term operations will result in significant impacts based on the SCAQMD regional and local thresholds of significance.

Therefore, the proposed Project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

B. Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed Project are based on the same forecasts as the AQMP. The 2016-2040 Regional Transportation/Sustainable Communities Strategy, prepared by SCAG, 2016, includes chapters on the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For the Project, the City of Commerce Land Use Plan defines the assumptions that are represented in the AQMP.

The proposed Project site is classified as Housing Opportunity in the City of Site 2 – Transportation Center 020 General Plan. The City of Commerce 2020 General Plan identifies the Housing Opportunity Area as permitting "…manufacturing uses to recycle to residential development should the property owner desire to do so. At such time the property owner determines industrial uses are no longer economically viable, the property must transition to residential uses. The permitted residential development densities range from 0 to 27 units per acre, yielding a population density of approximately 103 persons per acre." The Project includes the development of 145 total multi-family residential dwelling units on approximately 5.74 net acres (approximately 25.26 dwelling units per acre). If you look at each Project site individually, Site 1A – Harbor (5550 Harbor Street) Site is approximately 1.98 net acres with 37 dwelling units (approximately 18.69 dwelling units per acre), Site 1B – Jillson 1 (the Jillson Street) Site is approximately 1.33 net acres with 31 dwelling units (approximately 23.3 dwelling units per acre), and Site 2 – Transportation Center (5555 Jillson Street) Site is approximately 2.43 acres with 65 dwelling units (approximately 26.74 dwelling units per acre). Therefore, the proposed development would be consistent with the General Plan land use designation and would not result in an inconsistency with the land use designation in the City's General Plan. Therefore, the proposed Project is not anticipated to exceed the AQMP assumptions for the Project sites, and the Project is found to be consistent with the AQMP for the second criterion.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Based on the above, the Project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a **less than significant impact** will occur on the SCAQMD AQMP directly, indirectly, or cumulatively.				
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?	☐	☐	☒	☐

Response:

Cumulative projects include local development as well as overall growth within the project area. However, as with most development, the most significant source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects, and when wind patterns are considered, it will cover an even larger area. Accordingly, the cumulative analysis for the Project's air quality must be generic by nature.

The Project area is out of attainment for both ozone and PM10 particulate matter. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the South Coast Air Basin. The most significant cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. The air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact.

The Project (all three sites), as well as each Project site separately, when combined, do not exceed any of the thresholds of significance and therefore are considered **less than significant**.

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Response:

Regional Construction Emissions

As shown in Tables below, the construction emissions for each of the proposed Project sites separately would not exceed the SCAQMD's daily emission thresholds at the regional level. Further, when the emissions for all three projects, Site 1A – Harbor, Site 1B – Jillson 1, and Site 2 – Transportation Center, are combined, the proposed Project still does not exceed the SCAQMD's daily emission thresholds. Therefore, impacts are considered **less than significant.**

Site 1A – Harbor (5550 Harbor Street) Site - Regional Significance - Construction Emissions (lbs/day)[1]

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO_2	PM10	PM2.5
Demolition						
On-Site[2]	2.13	20.95	14.66	0.02	1.31	1.10
Off-Site[3]	0.08	0.59	0.69	0.00	0.18	0.05
Total	**2.21**	**21.54**	**15.35**	**0.03**	**1.49**	**1.15**
Site Preparation						
On-Site[2]	0.69	8.43	4.09	0.01	0.41	0.32
Off-Site[3]	0.72	22.77	5.49	0.06	1.50	0.46
Total	**1.41**	**31.20**	**9.59**	**0.07**	**1.91**	**0.78**
Grading						
On-Site[2]	1.35	15.09	6.45	0.01	2.60	1.61
Off-Site[3]	0.04	0.03	0.35	0.00	0.09	0.02
Total	**1.39**	**15.11**	**6.80**	**0.02**	**2.69**	**1.64**
Building Construction						
On-Site[2]	1.81	13.64	12.90	0.02	0.68	0.66
Off-Site[3]	0.25	1.21	2.09	0.01	0.58	0.16

Total	**2.06**	**14.85**	**14.99**	**0.03**	**1.26**	**0.82**
Paving						
On-Site[2]	0.68	6.24	8.80	0.01	0.31	0.28
Off-Site[3]	0.05	0.03	0.44	0.00	0.15	0.04
Total	**0.73**	**6.27**	**9.25**	**0.01**	**0.45**	**0.32**
Architectural Coating						
On-Site[2]	10.60	1.30	1.81	0.00	0.07	0.07
Off-Site[3]	0.04	0.02	0.31	0.00	0.10	0.03
Total	**10.64**	**1.33**	**2.12**	**0.00**	**0.17**	**0.10**
Total of overlapping phases[4]	**13.44**	**22.45**	**26.36**	**0.05**	**1.89**	**1.24**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[1] Source: CalEEMod Version 2016.3.2
[2] On-site emissions from equipment operated on-site that is not operated on public roads.
[3] Off-site emissions from equipment operated on public roads.
[4] Construction, architectural coatings, and paving phases may overlap.

Site 1B – Jillson 1 (5625 Jillson Street) Site - Regional Significance - Construction Emissions (lbs/day)[1]

Activity	Pollutant Emissions (pounds/day)					
	VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Demolition						
On-Site[2]	2.13	20.95	14.66	0.02	1.31	1.10
Off-Site[3]	0.08	0.59	0.69	0.00	0.18	0.05
Total	**2.21**	**21.54**	**15.35**	**0.03**	**1.49**	**1.15**
Site Preparation						
On-Site[2]	0.69	8.43	4.09	0.01	0.40	0.32
Off-Site[3]	0.74	22.78	5.61	0.06	1.53	0.47
Total	**1.43**	**31.21**	**9.71**	**0.07**	**1.93**	**0.79**
Grading						
On-Site[2]	1.35	15.09	6.45	0.01	2.60	1.61
Off-Site[3]	0.04	0.03	0.35	0.00	0.09	0.02
Total	**1.39**	**15.11**	**6.80**	**0.02**	**2.69**	**1.64**
Building Construction						
On-Site[2]	1.81	13.64	12.90	0.02	0.68	0.66
Off-Site[3]	0.17	0.68	1.40	0.01	0.39	0.11
Total	**1.98**	**14.32**	**14.30**	**0.03**	**1.07**	**0.77**
Paving						
On-Site[2]	0.67	6.24	8.80	0.01	0.31	0.28
Off-Site[3]	0.05	0.03	0.44	0.00	0.15	0.04
Total	**0.72**	**6.27**	**9.25**	**0.01**	**0.45**	**0.32**
Architectural Coating						
On-Site[2]	6.92	1.30	1.81	0.00	0.07	0.07
Off-Site[3]	0.03	0.02	0.21	0.00	0.07	0.02
Total	**6.95**	**1.32**	**2.02**	**0.00**	**0.14**	**0.09**
Total of overlapping phases[4]	**9.65**	**21.91**	**25.56**	**0.05**	**1.67**	**1.18**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[1] Source: CalEEMod Version 2016.3.2
[2] On-site emissions from equipment operated on-site that is not operated on public roads.
[3] Off-site emissions from equipment operated on public roads.
[4] Construction, architectural coatings, and paving phases may overlap.

Site 2 – Transportation Center (5555 Jillson Street) Site - Regional Significance - Construction Emissions (lbs/day)[1]

	Pollutant Emissions (pounds/day)

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Activity	VOC	NOx	CO	SO_2	PM10	PM2.5
Demolition						
On-Site[2]	2.13	20.95	14.66	0.02	1.49	1.13
Off-Site[3]	0.10	1.22	0.83	0.00	0.22	0.06
Total	**2.23**	**22.16**	**15.48**	**0.03**	**1.71**	**1.19**
Site Preparation						
On-Site[2]	0.18	1.84	1.99	0.00	0.19	0.12
Off-Site[3]	0.74	22.78	5.61	0.06	1.53	0.47
Total	**0.92**	**24.63**	**7.61**	**0.07**	**1.72**	**0.59**
Grading						
On-Site[2]	1.92	21.34	9.94	0.02	3.55	2.22
Off-Site[3]	0.05	0.04	0.44	0.00	0.11	0.03
Total	**1.97**	**21.38**	**10.37**	**0.02**	**3.66**	**2.25**
Building Construction						
On-Site[2]	2.05	16.03	14.56	0.03	0.82	0.78
Off-Site[3]	0.33	1.26	2.74	0.01	0.76	0.21
Total	**2.37**	**17.29**	**17.30**	**0.03**	**1.58**	**0.99**
Paving						
On-Site[2]	0.92	8.61	11.68	0.02	0.43	0.40
Off-Site[3]	0.06	0.04	0.51	0.00	0.17	0.05
Total	**0.98**	**8.65**	**12.20**	**0.02**	**0.60**	**0.45**
Architectural Coating						
On-Site[2]	13.61	1.30	1.81	0.00	0.07	0.07
Off-Site[3]	0.05	0.03	0.41	0.00	0.14	0.04
Total	**13.66**	**1.34**	**2.22**	**0.00**	**0.21**	**0.11**
Total of overlapping phases[4]	**17.02**	**27.28**	**31.72**	**0.06**	**2.39**	**1.54**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[1] Source: CalEEMod Version 2016.3.2
[2] On-site emissions from equipment operated on-site that is not operated on public roads.
[3] Off-site emissions from equipment operated on public roads.
[4] Construction, architectural coatings, and paving phases may overlap.

Site 1A – Harbor, Site 1B – Jillson 1, and Site 2 – Transportation Center Sites Combined - Regional Significance - Construction Emissions (lbs/day)[1]

	Pollutant Emissions (pounds/day)					
Activity	VOC	NOx	CO	SO_2	PM10	PM2.5
Demolition						
On-Site[2]	6.38	62.84	43.97	0.07	4.11	3.33
Off-Site[3]	0.27	2.40	2.20	0.01	0.58	0.16
Total	**6.65**	**65.24**	**46.17**	**0.08**	**4.69**	**3.49**
Site Preparation						
On-Site[2]	1.55	18.70	10.18	0.02	1.01	0.75
Off-Site[3]	2.20	68.34	16.71	0.19	4.55	1.40
Total	**3.76**	**87.04**	**26.90**	**0.21**	**5.56**	**2.15**
Grading						
On-Site[2]	4.62	51.51	22.84	0.05	8.75	5.45
Off-Site[3]	0.13	0.09	1.14	0.00	0.29	0.08
Total	**4.75**	**51.61**	**23.98**	**0.05**	**9.04**	**5.53**
Building Construction						
On-Site[2]	5.67	43.30	40.36	0.07	2.19	2.10
Off-Site[3]	0.74	3.16	6.23	0.02	1.73	0.47
Total	**6.41**	**46.46**	**46.59**	**0.09**	**3.91**	**2.58**

Paving						
On-Site[2]	2.26	21.08	29.29	0.05	1.05	0.97
Off-Site[3]	0.17	0.11	1.40	0.00	0.46	0.12
Total	**2.43**	**21.19**	**30.69**	**0.05**	**1.51**	**1.09**
Architectural Coating						
On-Site[2]	31.14	3.91	5.43	0.01	0.21	0.21
Off-Site[3]	0.11	0.07	0.92	0.00	0.30	0.08
Total	**31.26**	**3.98**	**6.36**	**0.01**	**0.52**	**0.29**
Total of overlapping phases[4]	**40.10**	**71.63**	**83.64**	**0.15**	**5.94**	**3.97**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[1] Source: CalEEMod Version 2016.3.2
[2] On-site emissions from equipment operated on-site that is not operated on public roads.
[3] Off-site emissions from equipment operated on public roads.
[4] Construction, architectural coatings, and paving phases may overlap.

Localized Construction Emissions

The data provided in the table below shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors to each of the proposed Project sites. In addition, as the Site 1B – Jillson 1 and Site 2 – Transportation Center sites are located adjacent to one another, their local construction emissions have been combined. As shown in the table, the combined emissions from the Site 1A – Harbor and Site 2 – Transportation Center sites would also not exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a **less than significant** local air quality impact would occur from the construction of the proposed Project.

Localized Significance - Construction[1]

Phase	On-Site Pollutant Emissions (pounds/day)[1]			
	NOx	**CO**	**PM10**	**PM2.5**
Site 1A – Harbor (5550 Harbor Street) Site				
Demolition	20.95	14.66	1.31	1.10
Site Preparation	8.43	4.09	0.41	0.32
Grading	15.09	6.45	2.60	1.61
Building Construction	13.64	12.90	0.68	0.66
Paving	6.24	8.80	0.31	0.28
Architectural Coating	1.30	1.81	0.07	0.07
Total of overlapping phases	**21.17**	**23.51**	**1.06**	**1.02**
SCAQMD Threshold for 25 meters (82 feet) or less[2]	**114**	**861**	**7**	**4**
Exceeds Threshold?	**No**	**No**	**No**	**No**
Site 1B – Jillson 1 (5625 Jillson Street) Site				
Demolition	20.95	14.66	1.31	1.10
Site Preparation	8.43	4.09	0.40	0.32
Grading	15.09	6.45	2.60	1.61
Building Construction	13.64	12.90	0.68	0.66
Paving	6.24	8.80	0.31	0.28
Architectural Coating	1.30	1.81	0.07	0.07
Total of overlapping phases	**21.17**	**23.51**	**1.06**	**1.02**
SCAQMD Threshold for 100 meters[3]	**121**	**1,496**	**39**	**10**
Exceeds Threshold?	**No**	**No**	**No**	**No**
Site 2 – Transportation Center (5555 Jillson Street) Site				
Demolition	20.95	14.66	1.49	1.13
Site Preparation	1.84	1.99	0.19	0.12

Grading	21.34	9.94	3.55	2.22
Building Construction	16.03	14.56	0.82	0.78
Paving	8.61	11.68	0.43	0.40
Architectural Coating	1.30	1.81	0.07	0.07
Total of overlapping phases	**25.94**	**28.06**	**1.32**	**1.25**
SCAQMD Threshold for 200 meters[4]	**145**	**2,625**	**74**	**22**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Site 1A – Harbor and Site 1B – Jillson 1 Sites Combined[5]				
Demolition	41.89	29.31	2.80	2.23
Site Preparation	10.27	6.09	0.59	0.43
Grading	36.43	16.39	6.15	3.84
Building Construction	29.66	27.46	1.50	1.44
Paving	14.85	20.49	0.74	0.68
Architectural Coating	2.61	3.62	0.14	0.14
Total of overlapping phases	**47.12**	**51.57**	**2.39**	**2.27**
SCAQMD Threshold for 100 meters[4]	**121**	**1,496**	**39**	**10**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Notes:
1 Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in Southeast LA County Source Receptor Area (SRA 5). Each of the project sites will disturb a maximum of 2 acres per day (see Table 7).
2 The nearest sensitive receptors to the Site 1A – Harbor Site are the residential land uses and Rosewood Park Elementary School located approximately 80 feet (~24 meters) to the north and northeast, respectively; however, according to LST methodology, any receptor located closer than 25 meters should be based on the 25-meter threshold.
3 The nearest sensitive receptors to the Site 1B – Jillson 1 Site are the residential uses located approximately 530 feet (~162 meters) east; therefore, to be conservative, the 100-meter threshold has been used.
4 The nearest sensitive receptors to the Site 2 – Transportation Center Site are the residential uses located approximately 775 feet (~236 meters) east; therefore, to be conservative, the 200-meter threshold has been used.
5 Site 1B – Jillson 1 and Site 2 – Transportation Center Sites are adjacent to one another; therefore, their local emissions have been combined and compared to the more stringent SCAQMD thresholds of the Site 1B – Jillson 1 Site (2 acres per day at a distance of 100 meters).

The Project includes the demolitions of all structures and parking areas on all three sites. As required by SCAQMD Rule 1403, the applicant will notify the SCAQMD ten days prior to beginning the demolition on each site.

Regional Operational Emissions

The operations-related criteria air quality impacts created by the proposed Project has been analyzed through the use of the CalEEMod model. The operating emissions were based on the year 2023 for all three of the proposed Project sites. The summer and winter emissions created by the long-term operations of each of the proposed Project sites were calculated, and the highest emissions from either summer or winter are summarized in the table below. The table also shows the combined operating emissions of all three developed Project sites.

Regional Significance - Unmitigated Operational Emissions (lbs/day)

	Pollutant Emissions (pounds/day)[1]					
Activity	**VOC**	**NOx**	**CO**	**SO2**	**PM10**	**PM2.5**
Site 1A – Harbor (5550 Harbor Street) Site						
Area Sources[2]	1.35	0.59	3.29	0.00	0.06	0.06
Energy Usage[3]	0.02	0.15	0.07	0.00	0.01	0.01
Mobile Sources[4]	0.33	1.41	4.59	0.02	1.48	0.40
Total Emissions	**1.70**	**2.15**	**7.94**	**0.02**	**1.55**	**0.48**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Site 1B – Jillson 1 (5625 Jillson Street) Site						
Area Sources[2]	0.93	0.57	3.20	0.00	0.06	0.06
Energy Usage[3]	0.02	0.15	0.06	0.00	0.01	0.01

Mobile Sources[4]	0.32	1.37	4.46	0.02	1.44	0.39
Total Emissions	**1.27**	**2.09**	**7.72**	**0.02**	**1.51**	**0.46**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Jillson 2 Site						
Area Sources[2]	1.86	1.14	6.40	0.01	0.12	0.12
Energy Usage[3]	0.03	0.30	0.13	0.00	0.02	0.02
Mobile Sources[4]	0.65	2.74	8.92	0.03	2.87	0.78
Total Emissions	**2.54**	**4.19**	**15.45**	**0.04**	**3.01**	**0.93**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Total Emissions Site 1A – Harbor, Site 1B – Jillson 1 and Site 2 – Transportation Center Sites Combined	**5.52**	**8.43**	**31.11**	**0.09**	**6.07**	**1.87**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[1] Source: CalEEMod Version 2016.3.2
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from on-site natural gas usage.
[4] Mobile sources consist of emissions from vehicles and road dust.

The table above provides the unmitigated operational emissions for each of the proposed Project sites separately as well as the combined total emissions for all three Project sites, Site 1A – Harbor, Site 1B – Jillson 1, and Site 2 – Transportation Center Sites. The table also shows that the Project sites developed separately, as well as when combined do not exceed the SCAQMD daily emission thresholds, and regional operational emissions are considered to be **less than significant.**

Localized Operational Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the vicinity of the proposed Project, all three sites, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin

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According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site, such as industrial warehouse/transfer facilities. The proposed Project is a residential project and does not include such uses. Therefore, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spot Emissions

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing the future without and with project CO levels to the State and Federal CO standards, which are presented in Section 5.0 of the Air Quality and Greenhouse Gas Study prepared for the Project.

To determine if the proposed Project could cause emission levels in excess of the CO standards discussed in Section 5.0, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

Micro-scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. The SCAQMD has demonstrated in the CO attainment re-designation request to EPA that there are no "hot spots" anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in Los Angeles County. If the worst-case intersections in the air basin have no "hot spot" potential, any local impacts will be below thresholds.

The Trip Generation Study showed that when all three Project site development were combined, they would generate only 789 total vehicle trips per day. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection that has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic for all three Project sites would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore, no CO "hot spot" modeling was performed, and **no significant long-term air quality impact** is anticipated to local air quality with the on-going use of the proposed Project.

Health Impacts

The California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS) standards were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. Primary state and federal standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health. The Project is below the CAAQS and the NAAQS, as found in Air Quality and Greenhouse Gas Impact Study. Therefore, the Project will have a **less than significant impact** on public health.

Standard Conditions

The City also requires the following standard conditions to prevent further the exposure of sensitive receptors to substantial pollutant concentrations.

- Equipment used for construction activities shall be properly tuned to reduce exhaust emissions.
- Construction activities shall be stopped during first and second stage smog alerts.
- During construction, trucks, and equipment that are not in use shall shut off their engines instead of idling.
- Construction equipment shall be kept in proper tune, and mufflers shall be used on all construction equipment to reduce equipment noise.
- Roads adjacent to the Project site shall be swept as needed to reduce fugitive dust from the proposed Project site.
- All grading operations will be suspended when wind speeds (as instantaneous gusts) exceed 35 miles per hour.
- The applicant and the contractors involved in demolition and/or construction activities must comply with all pertinent South Coast Air Quality Management District (SCAQMD) regulations and requirements governing Particulate Matter (PM10) generation (Rule 401, 403, etc.). PM10 pollution consists of very small liquid and solid particles floating in the air. These particles are less than 10 microns in diameter – about $1/7^{th}$ the thickness of the human – and are known as PM10.
- The Applicant or General Contractor shall keep the construction area sufficiently damped to control dust caused by construction and hauling, and at all times, provide reasonable control of dust caused by wind.

- All materials transported off-site shall either be sufficiently watered or securely covered to prevent excessive amounts of dust and spillage.

- The Applicant shall ensure that the contractors adhere to all pertinent SCAQMD protocols regarding grading, site preparation, and construction activities.

- The Applicant shall ensure that the grading and building contractors must adhere to all pertinent provisions of Rule 403 pertaining to the generation of fugitive dust during grading and/or the use of equipment on unpaved surfaces. The contractors will be responsible for being familiar with and implementing any pertinent best available control measures.

- All required permits by all permitting agencies shall be obtained for the operation of said use and any construction associated with the subject request.

Based on the information provided in the Section, impacts relating to the exposure of sensitive receptors to substantial pollutant concentrations will be **less than significant** directly, indirectly, and cumulatively.

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

Response:

Odors

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature, and the odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Diesel exhaust and VOCs would be emitted during the construction of the proposed Project, which is objectionable to some; however, emissions would disperse rapidly from the Project sites and, therefore, should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor-producing materials being utilized, **no significant impact** related to odors would occur during the construction of the proposed Project.

The SCAQMD recommends that odor impacts be addressed qualitatively. Such analysis shall determine whether the Project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Potential sources that may emit odors during the on-going operations of the proposed Project would include odor emissions from trash storage areas. Due to the distance of the nearest receptors from the Project sites and through compliance with SCAQMD's Rule 402, **no significant impact** related to odors would occur during the on-going operations of the proposed Project.

Construction-Related Toxic Air Contaminant Impact

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed Project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015, to describe the algorithms, recommended exposure variates, cancer, and noncancer health values. The air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. Hazard identification includes identifying all substances that are evaluated for cancer risk and/or non-cancer acute, 8-hour, and chronic health impacts and identifying any multi-pathway substances that present a cancer risk or chronic non-cancer hazard via non-inhalation routes of exposure.

Given the relatively limited number of heavy-duty construction equipment and construction schedule, the proposed Project would not result in a substantial long-term source of toxic air containment emissions and corresponding individual cancer risk. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
with the application of the standard City condition noted in (c) above, **no significant short-term toxic air contaminant impacts** would occur during the construction of the proposed Project.				
Sources: 1. City of Commerce 2020 General Plan, adopted January 2008 2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008 3. Title 19 – Zoning of the Commerce Municipal Code ➢ 19.19.110 – Air Quality ➢ 19.19.170 – Odor ➢ 19.19.180 - Vibration 4. Jillson Sites and Harbor Site Residential Development Air Quality and Greenhouse Gas Impact Study – prepared by MD Acoustics LLC, December 20, 2019				
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
Response: The Project sites are developed with buildings and parking areas and are located in an urbanized setting. As such, the site does not support habitat for any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. No natural, undeveloped open space areas are located within proximity of the Project sites. In addition, the Project sites are not located in a habitat conservation plan or designated by the County of Los Angeles as a Significant Ecological Areas (SEAs). As a result, no impacts to habitat conservation plans or natural community conservation plans will occur with the development of the Project sites. The Project will have **no impact** on habitat for any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations.				
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
Response: The Project sites are developed with buildings and parking areas and are located in an urbanized setting As such, the sites do not have any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service and therefore, will have **no impact** on these resources.				
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?	☐	☐	☐	☒
Response: The Project sites are developed with buildings and parking areas and are located in an urbanized setting. As such, the sites do not have any state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) resources and, therefore, will have **no impact** on these resources.				
d) Interfere substantially with the movement of any native resident or migratory fish or	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
Response: As noted above, the Project sites do not support habitat or species and therefore, will have **no impact** on established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
Response: As noted above, the Project sites do not support habitat or species, is not located in a habitat conservation plan or SEA, and The City does not have a tree preservation ordinance. Therefore, the Project will have **no impact** on established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
Response: The Project sites are an urbanized setting and are currently developed with buildings and parking areas proposed for demolition. No natural, undeveloped open space areas are located within proximity of the Project sites. In addition, the Project sites are not located in a habitat conservation plan or designated by the County of Los Angeles as a Significant Ecological Areas (SEAs). As a result, no impacts to habitat conservation plans or natural community conservation plans will occur with the development of the Project sites. As noted above, the Project site does not support habitat or species and, therefore, will have **no impact** on an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan.				
Sources: 1. City of Commerce 2020 General Plan, adopted January 2008 2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008 3. Title 19 – Zoning of the Commerce Municipal Code 4. Los Angeles County General Plan 2008 ➢ Figure 6.3 - Significant Ecological Areas(SEAs)				
V. **CULTURAL RESOURCES** – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
Response: Historical and archaeological resources include the following: (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4850 et seq.). (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852)

A Phase 1 Cultural Resources Assessment was prepared for all three sites, including the following processes: 1) a Cultural Resource Literature and Records Search; 2) Native American Communication; 3) a Cultural Resource Survey; and 4) a Significance Evaluation. The Project area is covered with structures and hardscape, including existing parking lots and sidewalks. The built-environment survey confirmed that no native soils were visible in the Project area, and no prehistoric or historic-period archaeological resources were encountered. However, Applied EarthWorks fieldwork did identify and document two built-environment resources within the Project area over fifty years of age. An evaluation of the significance of these buildings found that neither of the two resources Site 1A – Harbor (5550 Harbor Street) Site 1B – Jillson 1 (5625 Jillson Street) meet the criteria for listing on the California Register of Historical Resources (CRHR). Therefore, no further management of these two built-environment resources is recommended at this time, and the impact on historical resources is **less than significant**, directly, indirectly, and cumulatively.

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

Response:

While no archaeological resources were identified within the Project area, two soils series were identified in the Project area that are highly stratified and have the potential to contain undisturbed archaeological deposits. Although the exact depths of the prior disturbance are unknown, previous construction likely disturbed at least the upper three-feet of sediment in specific areas of the Project area and possibly up to fifteen-feet where underground tanks were installed. It is unlikely that archaeological deposits remained intact as a result of the various episodes' of previous disturbance; however, construction activity below three-feet (in areas that were not previously disturbed to fifteen-feet for water and fuel tanks) has the potential to encounter intact archaeological deposits during Project construction.

Therefore, the Project will have a **less than significant impact with mitigation** on the significance of archeological resources.

MM CR-1: During all demolition, grading, and ground-disturbing activities, a qualified archaeological monitor shall be present. If potentially significant archaeological materials are encountered during any future construction activities, all work must be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance and integrity of the find. If intact and significant archaeological remains are encountered, the impacts of the Project must be mitigated appropriately. Any such discoveries, and subsequent evaluation and treatment, should be documented in a cultural resource report, which should be submitted to the South Central Coastal Information Center (SCCIC) for archival purposes.

MM CR-2: If the Project area is expanded to include areas not covered by this survey or other recent cultural resource studies, additional cultural resource studies may be required.

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

Response:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

No cemeteries or human remains are known to occur on-site, and it is unlikely that human remains will be uncovered during Project development. Pursuant to CEQA Guidelines 15064.5 (e) in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

(1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

(A) The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and

(B) If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission within 24 hours.
2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98, or

(2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

(A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.

(B) The descendant identified fails to make a recommendation; or

(C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Following the requirements of CEQA Guidelines, 15064.5 (e) will ensure that if human remains are discovered, they will be handled appropriately. Therefore, the Project will have a **less than significant impact** on human remains.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Los Angeles County General Plan 2008
   - Figure 6.8 - Historical and Cultural Resource Sites
5. National Register of Historic Places Geographic Information System
6. California Office of Historic Preservation Website
7. Phase 1 Cultural Resource Assessment for the Rosewood Village Residential Project – prepared by Applied EarthWorks, Inc., prepared June 2020
8. Commerce A Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., February 11, 2019
9. Commerce B Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., February 5, 2019

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
10. Commerce 2 Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., April 1, 2019 11. Phase II Environmental Site Assessment Commerce A – prepared by Stantec Consulting Services, Inc., July 12, 2019 12. Phase II Environmental Site Assessment Commerce A – prepared by Stantec Consulting Services, Inc., July 12, 2019 13. Phase II Environmental Site Assessment Commerce 2 – prepared by Stantec Consulting Services, Inc., July 12, 2019				
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?	☐	☐	☒	☐

Response:

It is noted that while this section has been added to Appendix G of the CEQA Guidelines, the section of CEQA Guidelines, it references 15126.2 – Consideration and Discussion of Significant Environmental Impacts, by definition, would be applied only to Environmental Impact Reports (EIRs). Nevertheless, a general review of energy savings has been prepared below.

Construction of the 133 single-family residential attached homes would require the typical use of energy resources. Energy would be consumed during site clearing, excavation, grading, and construction. The construction process would be typical. No site conditions or Project features would require an inefficient or unnecessary consumption of energy. The Project has been designed in compliance with California's Energy Efficiency Standards and 2019 CALGreen Standards. Measures to be employed by this Project will include the following.

- Homes will include Solar and will be all-electric, no natural gas
- Stormwater drainage and retention during construction
- Water Conservation
- Compliance with the City's Landscape & Irrigation Ordinance
- Construction Site Maintenance and Trash Containment
- Stormwater/Urban Runoff Management and Discharge Control
- Air Pollution Reduction
- Solid Waste Management
- All other mandatory CalGreen requirements for residential development

The operation of the proposed residential units would involve the use of energy for heating, cooling, and equipment operation. These facilities would comply with all applicable California Energy Efficiency Standards and 2019 CALGreen Standards.

Lastly, the City also requires the following in the standard conditions of this type of development:

- The Project will be required to comply with all programs adopted by the City for the reduction of solid waste.

- Where feasible, the applicant shall use recycled materials during construction and recycle construction waste. A report shall be provided to the City of Commerce.

- Ultra-low flow water fixtures must be installed to reduce the volume of sewage to the system.

- The Project applicant shall install energy-efficient electrical appliances and equipment in accordance with the State of California's Energy Efficiency Standards (Title 24).

- The Project shall comply with the City's Low Impact Development Standards and Green Street Policy.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Neither the construction nor operation of the Project would result in wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources. Therefore, impacts related to wasteful energy use would be **less than significant**, directly, indirectly, or cumulatively.				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Response:

The Project has been designed in compliance with California's Energy Efficiency Standards and 2019 CALGreen Standards, as noted above. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts would be **less than significant**, directly, indirectly, or cumulatively.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 15 – Building and Construction of the Commerce Municipal Code
   - 15.06 – Water Conservation in Landscaping
4. Title 19 – Zoning of the Commerce Municipal Code
   - 19.23 – Landscaping Standards
   - 19.24 – Water-Efficient Landscaping Regulations
   - 19.33 – Low Impact Development
5. 2019 California Green Building Standards Code (CALGreen), Title 24, Part 11
6. County of Los Angeles Building Standards Code – Building, Residential, Green Building Standards, and Electrical Codes as amended by Title 15 – Building and Construction of the Commerce Municipal Code

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.	☐	☐	☒	☐

Response:

A geotechnical investigation of the properties was performed by Alta California Geotechnical Inc.(Alta) to examine the existing on-site geotechnical conditions and assess the impacts that the geotechnical conditions may have on the proposed development.

Tectonic Framework

Jennings and Bryant (1985) defined eight structural provinces within California that have been classified by predominant regional fault trends and similar fold structure. These provinces are, in turn, divided into blocks and sub-blocks that are defined by "major Quaternary faults." These blocks and sub-blocks exhibit similar structural features. Within this framework, the Project sites are located within Structural Province I, which is controlled by the dominant northwest trend of the San Andreas Fault and is divided into two blocks, the Coast Range Block and the Peninsular Range Block. The Peninsular Range Block, on which the sites are located, is characterized by a series of parallel, northwest-trending faults that exhibit right lateral dip-slip movement. These faults are terminated by the Transverse Ranges block to the north and extend southward to the Baja Peninsula. These northwest-trending faults divide the Peninsular Range block into eight sub-blocks. The Project sites are located on the Santa Ana sub-block, which is bound on the east by the Elsinore-Whittier fault zone and on the west by Newport-Inglewood fault zone.

Regionally Mapped Active Faults

Several large, active fault systems, including the Elsinore-Whittier, the Newport-Inglewood, and the San Andreas, occur in the region surrounding the Project sites. These fault systems have been studied extensively and, in large part, control the geologic structure of southern California.

Geologic Structure

Based upon Alta's site investigation and literature review, the onsite sediments are of Quaternary age and are not fractured, folded, or faulted.

Earthquake Hazards

The Project sites are located in southern California, which is a tectonically active area. The type and magnitude of seismic hazards affecting a site are dependent on the distance to the causative fault and the intensity and magnitude of the seismic event. The seismic hazard may be primary, such as surface rupture and/or ground shaking, or secondary, such as liquefaction and/or ground lurching.

Local and Regional Faulting

The Project sites are located on the northern portion of the Santa Ana sub-block, approximately 2.5 miles west of the Puente Hills fault zone, 4.2 miles south of the Elysian Park fault zone, 6.2 miles west of the Elsinore fault zone, 8.8 miles south of the Raymond fault zone, and 9.4 miles east of the Newport-Inglewood fault zone.

Seismicity

Ground shaking hazards caused by earthquakes along other active regional faults do exist. The 2019 California Building Code requires use-modified spectral accelerations and velocities for most structural designs. Seismic design parameters using soil profile types identified in the 2019 California Building Code are presented in Section 7.3 of the Geotechnical Investigation.

Surface Rupture

Active faults are not known to exist within the Project area, and a review of Special Publication 42 indicates the Project sites are not within a California State designated Alquist-Priolo earthquake fault zone. Accordingly, the potential for fault surface rupture on the Project sites is very low.

To further ensure the Project is designed to meet all requirements for geologic safety, the City employs the following standard conditions.

- The contractor, under the observation of the soil engineer, shall conduct all clearing, site preparation, or earthwork performed on the project.
- The soils engineer shall provide inspection for site clearing and grading in order to certify that the grading was done in accordance with approved plans and grading specifications.

Based on this analysis, compliance with an approved Geotechnical Investigation, the California Building Code, the City of Commerce Municipal Code, and the Project Standard Conditions will ensure that risks associated with primary surface ground rupture should be considered "low." Therefore, the potential hazards associated with fault rupture are considered **less than significant,** directly, indirectly, and cumulatively.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response:

Ground shaking hazards caused by earthquakes along other active regional faults do exist. The 2019 California Building Code requires use-modified spectral accelerations and velocities for most structural designs.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The site has been identified as a "D" site class in accordance with section 1613.3.2 of the CBC 2019. Utilizing this information, the computer program ATC Hazards by Location and ASCE 7-16 criterion, the spectral response accelerations that can be utilized for the Project are presented in Figure 2 of the Geotechnical Investigation. These parameters should be verified by the structural engineer. Additional parameters should be determined by the structural engineer based on the Occupancy Category of the proposed structures.

Based on this analysis, compliance with an approved Geotechnical Investigation, California Building Code, City of Commerce Municipal Code, and Project Standard Conditions will ensure that risks associated with ground shaking are considered **less than significant,** directly, indirectly, and cumulatively.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Response:

Seismic agitation of relatively loose saturated sands, silty sands, and some silts can result in a buildup of pore pressure. If the pore pressure exceeds the overburden stresses, a temporary quick condition known as liquefaction can occur. Liquefaction effects can manifest in several ways, including 1) loss of bearing; 2) lateral spread; 3) dynamic settlement; and 4) flow failure. Lateral spreading has typically been the most damaging mode of failure.

In general, the more recent that sediment has been deposited, the more likely it will be susceptible to liquefaction. Other factors that must be considered are groundwater, confining stresses, relative density, and the intensity and duration of seismically-induced ground shaking.

Groundwater was encountered during Alta's Investigation at a depth of approximately 47-feet below the ground surface. The regional groundwater map indicates that the historic high groundwater level is between 30- and 40-feet below the ground surface (CDMG, 1998). The Project sites are located in a liquefaction zone per the seismic hazard maps (CDMG, 2017).

Alta performed a liquefaction analysis utilizing SPT data from Borings B-1 through B-3 and laboratory test results. A description of Alta's analysis and calculations are presented in Appendix D of the Geotechnical Investigation. A groundwater level of 35-feet below the existing ground surface was assumed.

In summary, the analysis showed that the potential for onsite liquefaction (including loss of bearing, lateral spreading, dynamic settlement, and flow failure) on all three sites is very low to negligible. This is primarily due to the fines content and density of the underlying young alluvial fan deposits.

<u>Dry Sand Settlement</u>

The dry sand settlement is the process of settlement of the ground surface during a seismic event in sand layers. Based on the remedial grading recommendations, the density, and fines content of the underlying young alluvial fan deposits, the dry sand settlement is not anticipated to be a significant constraint.

<u>Expansion Potential</u>

Expansion index testing was performed on samples taken during Alta's subsurface investigation. Based on the results, it is anticipated that the majority of materials onsite are "low" to "medium" in expansion potential, when tested per ASTM D: 4829.

Implementation of existing state and local laws and regulations concerning soil liquefaction and ground failure is required of all projects in the City. Therefore, impacts related to liquefaction and ground failure would be **less than significant,** directly, indirectly, and cumulatively**.**

iv) Landslides?	☐	☐	☒	☐

Response:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
The site is situated on relatively level ground and is not immediately adjacent to any slopes or hillsides that could be potentially susceptible to slope instability. No signs of slope instability in the form of landslides, rockfalls, earth flows, or slumps were observed at or near the subject site during Alta's investigation. As such, risks associated with slope instability should be considered "negligible." Therefore, impacts related to landsliding and slope failure would be **less than significant,** directly, indirectly, and cumulatively**.**				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
Response: Erosion is a large-scale impact caused by human activity and disturbance of surface soil, wind, and water. Erosion cannot be eliminated, although existing regulations such as the CBC (which includes erosion control measures and best management practices) and NPDES permit requirements can reduce the potential impacts of erosion. No signs of erosion were observed during Alta's field investigation. Risks associated with flooding and erosion should be evaluated and mitigated by the project design Civil Engineer. Although the three properties are relatively flat, the Project will export approximately 235 cubic yards of dirt in approximately 17 truckloads for Site 1B – Jillson 1 (5625 Jillson Street) and 355 cubic yards of dirt in approximately 25 truckloads for Site 2 – Transportation Center (5555 Jillson Street). Site 1A – Harbor (5550 Harbor Street) will balance the dirt on site. Adherence to state and local regulations will reduce impacts related to erosion to **less than significant,** directly, indirectly, and cumulatively.				
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?	☐	☐	☒	☐
Response: See Responses VII a iii and iv above, and d below for additional information. Adherence to the recommendations of the geotechnical investigation will ensure that the Project will have a **less than significan**t impact on on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse either directly, indirectly or cumulatively.				
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?	☐	☐	☒	☐
Response: Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semi-arid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture. The California Building Code (CBC) 2019, Volume 2, Chapter 18, Division 1 Section 1803.2 mandates that special foundation design consideration is employed if the soil expansion Index is 20, or greater in accordance with Table 18-1-B. The methodology and scope for a geotechnical investigation are described in UBC Section 1803 and require an assessment of a variety of factors, such as slope stability, soil strength, adequacy of load-bearing soils, the presence of compressible or expansive soils, and the potential for liquefaction. The required content of the Geotechnical Investigation includes recommendations for foundation type and design criteria. These recommendations can include foundation design provisions that are intended to mitigate the effects of expansive soils, liquefaction, and differential settlement. In general, mitigation can be accomplished through a combination of ground modification techniques (i.e., stone columns, reinforcing nail and anchors, deep soil mixing, etc.), selection of an appropriate foundation type and configuration, and use of appropriate building/structural foundation systems.				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Section 1804.5 Excavation, Grading, and Fill require the preparation of a Geotechnical Investigation where a building will be constructed on compacted fill.

The International Building Code (IBC) replaced earlier regional building codes (including the Uniform Building Code) in 2000 and established consistent construction guidelines for the nation. In 2006, the IBC was incorporated into the California Building Code (CBC), and currently applies to all structures being constructed in California. The national model codes are therefore incorporated by reference into the building codes of local municipalities. The CBC includes building design and construction criteria that take into consideration the State's seismic conditions.

Through adherence to state and local seismic and structural regulations (i.e., California Seismic Hazards Mapping Act, California Building Code, Commerce Municipal Code, Project Standard Conditions, and the NPDES Permit Requirements)**,** the impacts of expansive soils will be **less than significant**, directly, indirectly, or cumulatively.

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

Response:

The Project will be served by the Los Angeles County Sanitation District (LACSD) sewer infrastructure. On December 2, 2019, the LACSD provided "will serve" letters for the Site 1A – Harbor and Site 1B – Jillson 1 sites. On December 4, 2019, they provided a "will serve" letter for the Site 2 – Transportation Center site. The "will serve" letters indicate that the LACSD has adequate capacity and infrastructure to serve the Project sites.

Therefore, the Project will have **no impact,** directly, indirectly or cumulatively in regard to septic systems, and the existing sewer system has adequate capacity for the proposed development.

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

Response:

Applied EarthWorks used the Society of Vertebrate Paleontology's (SVP) guidelines (2010) for sensitivity criteria to determine the paleontological resource potential of the Project area. According to these criteria, Applied EarthWorks considers the Holocene-age alluvial deposits covering the entire ground surface of the Project area (Qa) to have Low Potential for paleontological resources. However, the thickness of the surficial deposits is likely quite shallow, as indicated by Pleistocene material exposed at the ground surface approximately two miles from the Project area and Pleistocene-age fossils recovered from depths as shallow as eleven-feet below ground surface (bgs) within a few blocks of the Project area. Therefore, Applied EarthWorks suggests the Project area likely overlies portions of Pleistocene-age alluvial deposits and/or the Miocene-age Monterey Formation, both of which have High Potential for paleontological resources because of their well-documented prolific fossils.

Despite the Low Potential of the surficial alluvial deposits, Project-related excavations likely will encounter the High Potential older alluvial deposits and/or the Monterey Formation at unknown depths that may be quite shallow (e.g., eleven-feet bgs). In particular, Project plans potentially will impact these older deposits during localized excavations of fifteen-feet bgs for the water storage portions. However, the applied mitigation measures will ensure impacts to paleontological resources will be **less than significant with mitigation**.

MM PALEO-1: Prior to demolition, grading, or ground-disturbing activities, a paleontological resource impact mitigation program (PRIMP) shall be prepared in accordance with industry-wide best practices (Murphey et al., 2019) and SVP (2010) guidelines. A qualified professional paleontologist (Project Paleontologist, Principal Investigator) shall prepare the PRIMP prior to issuance of City demolition and grading permits for the Project. The PRIMP will specify the steps to be taken to mitigate impacts to paleontological resources. For instance, Worker's Environmental Awareness Program (WEAP) training should be

presented in-person to all field personnel prior to the start of Project-related earth-moving activities to describe the types of fossils that may be found and the procedures to follow if any are encountered. A PRIMP also will specify whether construction monitoring is required and, if so, the frequency of required monitoring (i.e., full-time, spot-checks, etc.). A PRIMP also provides details about fossil collection, analysis, and preparation for permanent curation at an approved repository. Lastly, the PRIMP describes the different reporting standards to be used—monitoring with negative findings versus monitoring resulting in fossil discoveries.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 15 – Building and Construction of the Commerce Municipal Code
4. Title 19 – Zoning of the Commerce Municipal Code
5. Preliminary Geotechnical Investigation 5550 Harbor Street, 5625 Jillson Street and 5555 Jillson Street, Commerce 1A, 1B and 2 – prepared by Alta California Geotechnical Inc., October 21, 2019
6. Paleontological Technical Memorandum for the Rosewood Village Residential Project – prepared by Applied EarthWorks, Inc., April 13, 2020

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?	☐	☐	☒	☐

Response:

Construction Greenhouse Gas Emissions Impact

The greenhouse gas emissions from Project construction equipment and worker vehicles from each of the three proposed Project sites are shown in the table below. The emissions are from all phases of construction for each of the Project sites. The total construction emissions amortized over a period of 30 years are estimated at 33.88 metric tons of CO_2e per year ($MTCO_2e$) for the Site 1A – Harbor (5550 Harbor Street) Site, 30.96 $MTCO_2e$ per year for the Site 1B – Jillson 1 (5625 Jillson Street) Site, 39.06 $MTCO_2e$ per year for the Site 2 – Transportation Center (5555 Jillson Street) Site, and 103.9 $MTCO_2e$ per year when all three Project sites are combined. Annual CalEEMod output calculations are provided in Appendix B of the Air Quality/Greenhouse Gas Study.

Construction Greenhouse Gas Emissions

Activity	Emissions ($MTCO_2e$)[1]		
	Onsite	Offsite	Total
Site 1A – Harbor (5550 Harbor Street) Site			
Demolition	72.1	9.4	81.5
Site Preparation	3.5	24.3	27.8
Grading	10.6	0.7	11.3
Building Construction	627.3	240.4	867.8
Paving	20.2	2.0	22.2
Coating	4.3	1.4	5.8
Total	738.0	278.3	1,016.3
Averaged over 30 years[2]	25	9	33.88
Site 1B – Jillson 1 (5625 Jillson Street) Site			
Demolition	72.9	9.4	82.3
Site Preparation	3.5	24.5	27.9
Grading	10.6	0.7	11.3
Building Construction	627.3	152.4	779.7
Paving	20.2	2.0	22.2

Coating	4.3	0.9	5.3
Total	738.8	189.9	928.8
Averaged over 30 years[2]	25	6	30.96
Site 2 – Transportation Center (5555 Jillson Street) Site			
Demolition	72.9	15.1	88.0
Site Preparation	1.0	24.5	25.4
Grading	15.5	0.8	16.4
Building Construction	717.9	293.1	1,011.0
Paving	26.6	2.3	28.9
Coating	1.5	0.7	2.2
Total	835.3	336.5	1,171.9
Averaged over 30 years[2]	28	11	39.06
Total Site 1A – Harbor, B, and 2 Sites Combined	2312.2	804.7	3,116.9
Averaged over 30 years[2]	77	27	103.90

Notes:
[1.] $MTCO_2e$=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, and nitrous oxide).

[2.] The emissions are averaged over 30 years because the average is added to the operational emissions, pursuant to SCAQMD.

* CalEEMod output (Appendix B of the Aire Quality/Greenhouse Gas Study)

Operational Greenhouse Gas Emissions Impact

Operational emissions occur over the life of the Project sites. As shown in the table below, the unmitigated operational emissions for the proposed Project sites are 435.03 metric tons of CO_2e ($MTCO_2e$) per year for the Site 1A – Harbor (5550 Harbor Street) Site, 421.27 $MTCO_2e$ per year for the Site 1B – Jillson 1 (5625 Jillson Street) Site, and 819.68 $MTCO_2e$ per year for the Site 2 – Transportation Center (5555 Jillson Street) Site. Furthermore, as shown in the table below, when all three Project sites are combined, the total emissions are 1,675.98 $MTCO_2e$ per year. Therefore, the GHG emissions of each of the Project sites' emissions individually as well as when all three of the Project sites' emissions are combined do not exceed the SCAQMD draft threshold of 3,000 metric tons CO2e per year for all land uses. Therefore, the Project's GHG emissions are considered to be **less than significant.**

Opening Year Unmitigated Project-Related Greenhouse Gas Emissions

	Greenhouse Gas Emissions (Metric Tons/Year)[1]					
Category	**Bio-CO2**	**NonBio-CO_2**	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
Site 1A – Harbor (5550 Harbor Street) Site						
Area Sources[2]	0.00	8.62	8.62	0.00	0.00	8.68
Energy Usage[3]	0.00	82.25	82.25	0.00	0.00	82.62
Mobile Sources[4]	0.00	282.23	282.23	0.01	0.00	282.57
Solid Waste[5]	3.45	0.00	3.45	0.20	0.00	8.56
Water[6]	0.76	15.38	16.15	0.08	0.00	18.72
Construction[7]	0.00	33.75	33.75	0.01	0.00	33.88
Total Emissions	4.22	422.23	426.45	0.31	0.00	**435.03**
SCAQMD Draft Screening Threshold						**3,000**
Exceeds Threshold?						**No**
Site 1B – Jillson 1 (5625 Jillson Street) Site						
Area Sources[2]	0.00	8.39	8.39	0.00	0.00	8.45
Energy Usage[3]	0.00	80.03	80.03	0.00	0.00	80.39
Mobile Sources[4]	0.00	274.60	274.60	0.01	0.00	274.93
Solid Waste[5]	3.36	0.00	3.36	0.20	0.00	8.33
Water[6]	0.74	14.97	15.71	0.08	0.00	18.21
Construction[7]	0.00	30.81	30.81	0.00	0.00	30.96
Total Emissions	4.11	408.79	412.89	0.30	0.00	**421.27**
SCAQMD Draft Screening Threshold						**3,000**
Exceeds Threshold?						**No**
Site 2 – Transportation Center (5555 Jillson Street) Site						
Area Sources[2]	0.00	16.77	16.77	0.00	0.00	16.90

ISSUES & SUPPORTING INFORMATION SOURCES:			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated		Less Than Significant Impact	No Impact
Energy Usage[3]	0.00	160.06	160.06	0.01	0.00	160.78	
Mobile Sources[4]	0.00	549.19	549.19	0.03	0.00	549.87	
Solid Waste[5]	6.72	0.00	6.72	0.40	0.00	16.66	
Water[6]	1.49	29.93	31.42	0.15	0.00	36.42	
Construction[7]	0.00	38.88	38.88	0.01	0.00	39.06	
Total Emissions	8.21	794.84	803.05	0.59	0.01	**819.68**	
SCAQMD Draft Screening Threshold							**3,000**
Exceeds Threshold?							**No**
Total Emissions Harbor Site, Jillson 1 Site, & Jillson 2 Site Combined							**1,675.98**
SCAQMD Draft Screening Threshold							**3,000**
Exceeds Threshold?							**No**

Notes:
[1] Source: CalEEMod Version 2016.3.2
[2] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
[3] Energy usage consists of GHG emissions from electricity and natural gas usage.
[4] Mobile sources consist of GHG emissions from vehicles.
[5] Solid waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
[6] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[7] Construction GHG emissions based on a 30-year amortization rate.

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

Response:

The proposed Project sites would have the potential to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The City of Commerce does not currently have a Climate Action Plan; therefore, the Project sites have been compared to the goals of the CARB Scoping Plan.

Scoping Plan

Emission reductions in California alone would not be able to stabilize the concentration of greenhouse gases in the earth's atmosphere. However, California's actions set an example and drive progress toward a reduction in greenhouse gases elsewhere. If other states and countries were to follow California's emission reduction targets, this could avoid medium or higher ranges of global temperature increases. Thus, severe consequences of climate change could also be avoided.

The ARB Board approved a Climate Change Scoping Plan in December 2008. The Scoping Plan outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. The Scoping Plan "proposes a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (California Air Resources Board 2008). The measures in the Scoping Plan have been in place since 2012.

This Scoping Plan calls for an "ambitious but achievable" reduction in California's greenhouse gas emissions, cutting approximately 30 percent from business-as-usual emission levels projected for 2020, or about 10 percent from today's levels. On a per-capita basis, that means reducing annual emissions of 14 tons of carbon dioxide for every man, woman, and child in California down to about 10 tons per person by 2020.

In May 2014, CARB released its *First Update to the Climate Change Scoping Plan* (CARB 2014). This *Update* identifies the next steps for California's leadership on climate change. While California continues on its path to meet the near-term 2020 greenhouse gas limit, it must also set a clear path toward long-term, deep GHG emission reductions. This report highlights California's success to date in reducing its GHG emissions and lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.

In November 2017, CARB released the 2017 Scoping Plan. This Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts and identifies new policies and actions to accomplish the State's climate goals, and includes a description of a suite of specific actions to meet the

State's 2030 GHG limit. In addition, Chapter 4 provides a broader description of the many actions and proposals being explored across the sectors, including the natural resources sector, to achieve the State's mid and long-term climate goals.

Guided by legislative direction, the actions identified in the 2017 Scoping Plan reduce overall GHG emissions in California and deliver policy signals that will continue to drive investment and certainty in a low carbon economy. The 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources.

As the latest, 2017 Scoping Plan builds upon previous versions, Project consistency with applicable strategies of both the 2008 and 2017 Plan are assessed in the table below. As shown in the table, the Project sites are consistent with the applicable strategies and would result in a **less than significant impact**.

Therefore, the Project sites would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Furthermore, the Project sites will also comply with applicable Green Building Standards and City of Commerce's policies regarding sustainability (as dictated by the City's General Plan).

Project Consistency with CARB Scoping Plan Policies and Measures[1]

2008 Scoping Plan Measures to Reduce Greenhouse Gas Emissions	Project Compliance with Measure
California Light-Duty Vehicle Greenhouse Gas Standards – Implement adopted standards and planned the second phase of the program. Align zero-emission vehicles, alternative and renewable fuel, and vehicle technology programs with long-term climate change goals.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.
Energy Efficiency – Maximize energy efficiency building and appliance standards; pursue additional efficiency, including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent.** The Project will be compliant with the current Title 24 standards.
Low Carbon Fuel Standard – Develop and adopt the Low Carbon Fuel Standard.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.
Vehicle Efficiency Measures – Implement light-duty vehicle efficiency measures.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.
Medium/Heavy-Duty Vehicles – Adopt medium and heavy-duty vehicle efficiency measures.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.
Green Building Strategy – Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards that are mandatory in the 2016 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	The Project will be subject to these mandatory standards.			
High Global Warming Potential Gases – Adopt measures to reduce high global warming potential gases.	**Consistent.** CARB identified five (5) measures that reduce HFC emissions from vehicular and commercial refrigeration systems; vehicles that access the Project are required to comply with the measures that will comply with the strategy.			
Recycling and Waste – Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The state is currently developing a regulation to reduce methane emissions from municipal solid waste landfills. The Project will be required to comply with City programs, such as City's recycling and waste reduction program, which comply, with the 75 percent reduction required by 2020 per AB 341.			
Water – Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The Project will comply with all applicable City ordinances and CAL Green requirements.			
2017 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	**Project Compliance with Recommended Action**			
Implement Mobile Source Strategy: Further, increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Car regulations.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.			
Implement Mobile Source Strategy: At least 1.5 million zero-emission and plug-in hybrid light-duty electric vehicles by 2025 and at least 4.2 million zero-emission and plug-in hybrid light-duty electric vehicles by 2030.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.			
Implement Mobile Source Strategy: Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero-emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.			
Implement Mobile Source Strategy: Last-Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last-mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	**Consistent.** These are CARB enforced standards; vehicles that access the Project are required to comply with the standards that will comply with the strategy.			
Implement SB 350 by 2030: Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Consistent.** The Project will be compliant with the current Title 24 standards.			
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Consistent.** The Project will be required to comply with City programs, such as City's recycling and waste reduction program, which comply, with the 75 percent reduction required by 2020 per AB 341.			
Notes: 1. Source: CARB Scoping Plan (2008 and 2017)				

Sources:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Jillson Site and Harbor Site Residential Development Air Quality and Greenhouse Gas Impact Study – prepared by MD Acoustics LLC, December 20, 2019

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?	☐	☐	☒	☐

Response:

Hazardous materials are highly regulated in California, including the methods in which they are transported, used, and stored. The development of a residential project will not result in the transport, use, or storage of massive quantities of hazardous materials. The City relies on the assistance of the Fire Department and the County's Department of Environmental Health in the regulation of hazardous materials.

The residents of the Project will store and use various chemicals for routine housekeeping and landscaping purposes. Comparable products will be required for the common recreation areas and general Project maintenance. However, none of these chemicals will be used in sufficient quantities to pose a threat to humans or the environment. Project-related impacts associated with the hazardous materials will be **less than significant,** directly, indirectly, or cumulatively.

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?	☐	☒	☐	☐

Response:

Site 1A – Harbor (5550 Harbor Street)

Site Demolition and Clearance

The Site is approximately 1.98 acres (including the parking area for the Brenda Villa Aquatic Center) in size. It flat and currently developed with one and one-half story, 27,376-square-foot, light industrial, warehouse, and attached office building built in 1956 and an asphalt parking lot associated with the Aquatic Center. Prior to the mid-1940s, the project area was used for agricultural orchards. A former railroad spur was located adjacent to the southerly property line and is now an alley. The site is bounded to the north by Harbor Street, to the west by a commercial warehouse structure, to the east by the Brenda Villa Aquatic Center, and to the south by an alley. There are power poles on the western boundary.

The existing building and asphalt parking area are proposed for demolition. Prior to any demolition, compliance with **MM HAZ**-1 and **MM HAZ-2** shall be required.

Possible Site Contaminants

An 8,000-gallon leaded gasoline underground storage tank (UST) was located off of the Property and along the southwestern perimeter of the asphalt parking lot. It was removed on September 9, 1996, under the oversight of the Los Angeles County Fire Department (LACFD). Prior testing indicated no soil impacts above cleanup levels. Therefore, this issue is considered a Historical REC. In light of the pending change in the use of the Property for residential purposes and the lack of any soil vapor data as part of the prior testing, Stantec Consulting Services, Inc. prepared both a Phase 1 and a Phase II Environmental Site Assessment on the property and recommended collecting soil vapor samples in the vicinity of the former UST area to verify no impact exists above risk-based screening levels. Stantec also recommended collecting additional soil vapor data at the Property and performing a vapor intrusion human health risk assessment (VIHHRA) for the Property to evaluate potential risks to future residential

receptors better. Based on the results of additional assessment and VIHHRA, a determination can be made if further actions – such as human health risk mitigation measures in the form of vapor barriers and passive venting – are necessary to address potential vapor intrusion for the planned residential development. As well, Stantec recommended engaging the California Department of Toxic Substances Control (DTSC) to provide regulatory oversight of the completed investigations and the proposed human health risk assessment (HHRA). The intent is to obtain from the DTSC a no further action (NFA) letter at the completion of any additional Site investigation/potential mitigation activities.

Based on information available at DTSC and City Ventures Homebuilders, LLC (City Ventures), the Project site is or may be contaminated with hazardous substances, including volatile organic compounds and metals, Therefore, on December 17, 2019, City Ventures entered into a Standard Voluntary Agreement with DTSC pursuant to the Health and Safety Code section 25201.9, which authorizes the DTSC to provide assistance to a person complying with Health and Safety Code Chapter 6.8 and its implementing regulations.

Under the agreement, City Ventures will investigate, remediate, and/or evaluate all releases, threatened release, and potential releases of any hazardous substance at or from the site under the oversight of DTSC, including the above-noted needed recommendations of Stantec. The investigation, remediation, and/or evaluation of all releases will be conducted in accordance with **MM HAZ-3**.

<u>Site 1B – Jillson 1 (5625 Jillson Street)</u>

Site Demolition and Clearance

The site is 1.33- acres in size. The site is flat and currently developed with a one and one-half story, 19,629-square-foot, light industrial, warehouse and attached office building constructed in 1949 and associated asphalt parking area, which is also used as a transitional storage area for miscellaneous household debris. A review of aerial photos indicates that the property was vacant with a railroad right-of-way associated with the Atchison Topeka Railroad heading onto the southern portion of the property from Jillson Street. The railroad right-of away was built around 1936. Then in 1949, the current building was built. The site is bounded to the north and east by railroad tracks, to the west by Site 2 – Transportation Center, and to the south by Jillson Street.

The existing building, an asphalt parking area, are proposed for demolition. Prior to any demolition, compliance with **MM HAZ**-1 and **MM HAZ-2** shall be required.

Possible Site Contaminants

The adjacent Transportation Center at 5555 Jillson Street was listed in various Underground Storage Tank (UST) environmental databases. The facility received closure from the Los Angeles Regional Water Quality Control Board (LARWQCB) on March 26, 2014. Reports reviewed by Stantec indicate the soil surrounding the former USTs was impacted with xylene, diesel, methyl tert-butyl ether, tert-butyl alcohol (TBA), and other fuel oxygenates. According to the underground storage tank low-risk case review form, one 10,000-gallon gasoline fuel underground storage tank (UST) and two 10,000-gallon diesel fuel USTs were removed in June 2010. Residual concentrations of total petroleum hydrocarbons as diesel (TPHd) at 1,610 milligrams per kilogram (mg/kg), xylenes at 0.051 mg/kg, and MTBE at 0.0068 mg/kg were left in place. Given the proposed change in development to residential and the lack of any soil vapor data, Stantec recommends collecting soil vapor samples along the western perimeter to verify no impact exists above risk-based screening levels.

Based on information available at DTSC and City Ventures Homebuilders, LLC (City Ventures), the Project site is or may be contaminated with hazardous substances, including volatile organic compounds and metals, Therefore, on December 17, 2019, City Ventures entered into a Standard Voluntary Agreement with DTSC pursuant to the Health and Safety Code section 25201.9, which authorizes the DTSC to provide assistance to a person complying with Health and Safety Code Chapter 6.8 and its implementing regulations.

Under the agreement, City Ventures will investigate, remediate, and/or evaluate all releases, threatened releases, and potential releases of any hazardous substance at or from the site under the oversight of

DTSC, including the above-noted needed recommendations of Stantec. The investigation, remediation, and/or evaluation of all releases will be conducted in accordance with **MM HAZ-3**.

Site 2 – Transportation Center (5555 Jillson Street)

Site Demolition and Clearance

The site is 2.43- acres in size. The site is developed with the City of Commerce Transportation Center office building and a two-story parking structure with a ramp. The first floor of the parking structure is used for bus parking and maintenance, which includes a dump station for sewage in the northeastern corner, and a bus wash in the southeastern corner. The northern portion of the on-site building is used for automobile service. It includes two in-ground hydraulic lifts, an alignment pit, four-post aboveground lifts, two aboveground scissor lifts, and an in-ground wash clarifier in the western portion of the building, which is connected to a smaller in-ground clarifier located in the eastern portion of the building. A three-stage clarifier was observed in the southeastern driveway, which is connected to the bus wash located in the northeastern portion of the Property. A review of aerial photos indicates that the property was vacant until around 1936 when a railroad right-of-way associated with the Atchison Topeka Railroad was built heading onto the northern portion of the property from Jillson Street. Then in 1952/1953, a structure and parking area were built. Lastly, by 2003 the 1952 structure was demolished, and the existing building and parking structure were added.

Former underground storage tanks (USTs) were located between the service bay area and the two-story parking structure in the northern portion of the Property. Given the absence of detected soil impacts above cleanup levels and the closure of the USTs by the government agencies, this UST is considered a controlled REC (CREC) to the Property. In addition, the building located in the northern portion of the Property is used for automobile service with two in-ground hydraulic lifts, an alignment pit, four-post aboveground lifts, two aboveground scissor lifts, and two in-ground clarifiers. A hydraulic lift pump is located adjacent to the easternmost lift. As well, there is one 500-gallon waste oil aboveground storage tank (AST) in the eastern service bay with a small (<5 feet) spill beneath the AST. Eight 250-gallon ASTs containing new oil are located in the southern portion of the auto service area. Six 60-gallon metal containers containing new anti-freeze, automatic transmission fluid, and gear oil are located on the first floor of the parking structure in the southeastern corner. Lastly, a three-stage clarifier is located in the concrete driveway in the southeastern corner of the Property. The clarifier receives wastewater from the car wash and is pumped out approximately every six months. Due to the proposed redevelopment plan for the property to residential use, and the lack of any soil vapor data in relation to the former USTs, Stantec recommended collecting soil vapor samples to verify no vapor impact exist above risk-based screening levels.

Based on information available at DTSC and City Ventures Homebuilders, LLC (City Ventures), the Project site is or may be contaminated with hazardous substances, including volatile organic compounds and metals, Therefore, on December 17, 2019, City Ventures entered into a California Land Reuse and Revitalization Act Program Agreement with DTSC pursuant to the California Land Reuse and Revitalization Act of 2004 (CLRRA).

Under the agreement, City Ventures will implement CLRRA for the assessment and remediation of the site, including the above-noted needed recommendations of Stantec. The assessment and remediation will be conducted in accordance with **MM HAZ-4**.

Construction and Operational Hazards

The Project will not create hazards to the public through upset or accident during the construction process; any hazardous materials will be handled, stored, and used in compliance with all Federal, State, and City regulations. The Project will create single-family attached residences that, when occupied, may have the storage and use of various chemicals for routine housekeeping and landscaping purposes. Comparable products will be required for the common recreation areas and general Project maintenance. However, none of these chemicals will be used in sufficient quantities to pose a threat to humans or the environment.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Project-related impacts associated with the hazardous materials will be **less than significant with mitigation,** directly, indirectly, or cumulatively.

MM HAZ-1: Prior to the renovation, refurbishing, or demolition activities of any structures or parking areas all Asbestos Containing Materials (ACM) and Asbestos Containing Construction Materials (ACCM) shall be removed by a licensed abatement contractor in accordance with all applicable laws, including guidelines of the Occupational Safety and Health Administration ("OSHA"). If the entire area of asbestos-containing material is not affected by the renovation, refurbishing, or demolition activities, spot abatement of the material could be completed, provided it complies with applicable laws and regulations. These requirements entail only abating the affected areas. If the identified ACM is going to be managed in-place, then written notification to employees, tenants, contractors, or purchasers of the Property in regard to the presence and location of ACMs and ACCMs is required pursuant to the California Health and Safety Code 25915.

Historically, certain concealed materials may be present within wall cavities (e.g., electrical wire wrapping, insulation materials, vapor barrier paper, gypsum board, joint compound, etc.) that contain asbestos, and some underground utility piping has been known to contain asbestos (e.g., Transite pipe). If demolition of the Property includes removal of on-site portions of underground utilities (storm drains, sewer, domestic water laterals, etc.), evaluation of the asbestos content of these components must be performed prior to the removal process. Suspect materials identified in these locations are assumed positive for asbestos until sampling and analysis indicate otherwise. If, during the course of a renovation/demolition project, suspect ACMs are discovered that are not included within any Pre-Demolition Asbestos and Lead-Based Paint Survey, those materials are to be assumed positive for asbestos unless additional sampling, analysis and/or assessment indicates otherwise.

MM HAZ-2: Prior to renovation, refurbishing, or demolition activities, it is recommended that any lead-containing paint be stabilized. The paint stabilization work should be performed by a State of California, Licensed Contractor, who maintains the California Department of Public Health (CDPH) trained and certified lead workers. Additionally, the work shall be performed in accordance with the Occupational Safety and Health Administration (OSHA) requirements OSHA 29 CFR 1926.62 (Lead – Safety and Health Regulations for Construction) and the Division of Occupational Safety and Health (DOSH) requirements DOSH 8 CCR Section 1532.1 (Lead in Construction Standard).

MM HAZ-3: Prior to and in conjunction with the demolition permit issuance, City Ventures will complete the investigation, remediation, and/or evaluation of all releases on the site in accordance with the Standard Voluntary Agreement with the DTSC and approved Scope of Work.

MM HAZ-4: Prior to and in conjunction with the demolition permit issuance, City Ventures will implement CLRRA for assessment and remediation of the site in accordance with the California Land Reuse and Revitalization Act Program Agreement with the DTSC and approved Scope of Work.

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

Response:

The Rosewood Park Elementary School (2353 South Commerce Way) is located approximately 79-feet from the closest point of Site 1A – Harbor (5550 Harbor Street) and the closest property line of the school site or .06 of a mile. The closest point of Site 2 – Transportation Center (5555 Jillson Street), the furthest site, and the closest property line of the school site is 897-feet or .72 of a mile.

Demolition and Site Clearance Processes

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

As noted in b) above, the site may need to be remediated for hazardous materials on the three sites. This remediation will be conducted in compliance with California Health and Safety Code, federal, state, and local laws in addition to all requirements of the DTSC.

Construction and Operational Processes

Through the construction process, any hazardous materials will be handled, stored, and used in compliance with all Federal, State, and City regulations. As noted above, the Project will create single-family residences that will store and use various chemicals for routine housekeeping and landscaping purposes. Comparable products will be required for the common recreation areas and general Project maintenance. However, none of these chemicals will be used in sufficient quantities to pose a threat to humans or the environment.

Compliance with all requirements for demolition and clearance activities of the subject sites in accordance with the DTSC, the California Health and Safety Code, federal, state, and local laws and the implementation of **MM HAZ-1 – MM HAZ-3** will ensure that the school and the occupants of the school property will be protected. The Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste to cause danger to surrounding schools. Therefore, **impacts are less than significant with mitigation,** directly, indirectly, or cumulatively to schools will 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?	☐	☒	☐	☐

Response:

See response b) above.

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?	☐	☐	☐	☒

Response:

The Project is not located within a Los Angeles County Airport Land Use Commission (ALUC) area. The City is not located within two miles of an operational public airport. The nearest airport is El Monte Airport, located approximately seven miles to the southwest. The nearest major airport is located in Long Beach, approximately eighteen miles to the southeast. Los Angeles International Airport (LAX) is located approximately 28 miles to the northwest.

Given the above information, the Project will have **no impact** on creating a safety hazard for people residing or working in the Project area from airport operations, directly, indirectly, and cumulatively.

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

Response:

Los Angeles County adopted the All-Hazards Mitigation Plan (AHMP), providing a framework for emergency response. As well, the City maintains an Emergency Operations Plan (EOP) that documents City policies for responding to major emergencies that threaten life, safety, and property. The plan establishes a chain of command and outlines the responsibilities of various City departments in the event of an emergency.

The City's General Plan Exhibit 7-1—Safety Plan shows the location of the City's Emergency Evacuation Routes. Neither Jillson Street nor Harbor Street are planned evacuation routes.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Site 1A – Harbor (5550 Harbor Street) will take access from an existing driveway off Harbor Street. Site 1B – Jillson 1 (5625 Jillson Street) will take access from a single driveway off Jillson Street, which will serve both this site and the Site 2 – Transportation Center (5555 Jillson Street) site. The Project will not alter the existing circulation pattern in the Project area. Emergency access and evacuation routes will be unaffected by the Project.

The Project provides adequate access for emergency vehicles, including adequate street widths and vertical clearance on new streets. Implementation of federal, state, and local laws and regulations in the construction of this Project would result in **less than significant impact.**

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

Response:

The Project site is not within a fire hazard zone, as defined by the Los Angeles County AHMP, Figure 7-1 – Los Angeles County Very High Fire Hazard Severity Zones. Fire protection is provided by the Los Angeles County Fire Department. The placement of the buildings has been configured for fire access in case of an emergency. The Project will not expose people or structures to significant risks associated with wildfires and, therefore, **no impact**, directly, indirectly or cumulatively will occur.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
   - Exhibit 7-1 – Safety Plan
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Section 19.19.120 – Hazardous Material and Waste
5. Montebello Unified School District website – accessed March 21, 2020
6. Commerce A Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., February 11, 2019
7. Commerce B Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., February 5, 2019
8. Commerce 2 Phase I Environmental Site Assessment – prepared by Stantec Consulting Services, Inc., April 1, 2019
9. Phase II Environmental Site Assessment Commerce A – prepared by Stantec Consulting Services, Inc., July 12, 2019
10. Phase II Environmental Site Assessment Commerce A – prepared by Stantec Consulting Services, Inc., July 12, 2019
11. Phase II Environmental Site Assessment Commerce 2 – prepared by Stantec Consulting Services, Inc., July 12, 2019
12. Los Angeles County Airport Land Use Commission website and GIS mapping – accessed March 20, 2020
13. Los Angeles County Local All-Hazards Mitigation Plan – adopted 2014
    - Figure 7-1 – Los Angeles County Very High Fire Hazard Severity Zones
14. Toxics Release Inventory (TRI) Program – https://www.epa.gov/toxics-release-inventory-tri-program/learn-about-toxics-release-inventory
15. DTSC – ENVIROSTOR – https://www.envirostor.dtsc.ca.gov/public/

X. HYDROLOGY AND WATER QUALITY – Would the project:

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

Response:

See responses in Section XVX below for further information on water and wastewater.

Water – All Three Project Sites

Senate Bill (SB) 610 (Chapter 643, Statutes of 2001; Water Code Sections 10910–10915) made changes to the Urban Water Management Planning Act to require additional information in UWMPs if groundwater is identified as a source available to the supplier. The information required includes a copy of any groundwater management plan adopted by the supplier, a copy of the adjudication order or decree for adjudicated basins, and if non-adjudicated, whether the basin has been identified as being over-drafted or projected to be over-drafted in the most current DWR publication on that basin. If the basin is in overdraft, that plan must include current efforts to eliminate any long-term overdraft. A key provision in SB 610 requires that large development projects supplied with water from a public water system and subject to CEQA be provided a specified water supply assessment, except as specified in the law. Large development projects include those with 500 or more residential units, 500,000 square feet of retail, commercial space, or 250,000 square feet of commercial office space. These assessments, prepared by "public water systems" responsible for service, address whether there are adequate existing or projected water supplies available to serve proposed projects, in addition to urban and agricultural demands and other anticipated development in the service area in which the project is located.

SB 221 (Chapter 642, Statutes of 2001; Government Code Section 66473.7) prohibits approval of subdivisions consisting of more than 500 dwelling units unless there is verification of sufficient water supplies for the project from the applicable water supplier(s). This requirement also applies to approvals that would increase the number of service connections by 10% or more for public water systems with less than 500 service connections. The law defines criteria for determining "sufficient water supply," such as using normal, single-dry, and multiple-dry year hydrology and identifying the amount of water that the supplier can rely on to meet existing and future planned uses. Rights to extract additional groundwater, if used for the project, must be substantiated.

The Project proposes 133 single-family attached residential units that will be served by California Water Service Company East Los Angeles District (Cal Water). Since the Project proposes less than 500 dwelling units, a water supply assessment (WSA) was not required.

Cal Water will provide water to the three Project sites and has provided "will serve" letters for all three sites on January 12, 2020. Cal Water has operated the City of Commerce's water system since 1985. They receive their water supplies from two sources: the Metropolitan Water District and underground wells. A total of twelve wells pump water from the underlying Los Angeles Basin. Well depths throughout the City range from 270 to 659-feet, but most wells extend about 300-feet below the ground surface.

Groundwater – All Three Project Sites

Groundwater aquifers are recharged frequently in an effort to maintain the natural level of the Los Angeles Basin. Water supplies are also maintained above ground in reservoir tanks. Cal Water owns four tanks. Two have a capacity of 500,000 gallons, one has a capacity of one million gallons, and one has a capacity of 2.5-million gallons. In general, the City's water quality is good. The State Department of Health monitors the water quality, and according to Health Department engineers, Commerce has had relatively few problems with well contamination. On a few occasions, manganese levels have exceeded the safety standards set forth by the Safe Water Drinking Act, but corrective measures have effectively mitigated these problems.

Groundwater was encountered during Alta's Investigation at a depth of approximately 47-feet below the ground surface. The regional groundwater map indicates that the historic high groundwater level is between 30- and 40-feet below the ground surface (CDMG, 1998). Grading for the Project will not extend to depths where groundwater can be encountered. As noted above, construction on the Project sites will comply with the requirements of Chapter 6.17 -- Stormwater and Runoff Pollution Control of the Municipal Code. As such a Preliminary Low Impact Development (LID) Plan has been prepared consistent with the Los Angeles County Department of Public Works LID Manual and the intent of the NPDES stormwater requirements (State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002, dated July 1, 2010) and Los Angeles County Municipal Stormwater/NPDES Permit Order R4-2012-0175. In addition, the applicant will be required to prepare a Stormwater Pollution Preventions Program (SQPPP) pursuant to the General Construction Activity NPDES regulations.

Water supply in the City is derived from local groundwater wells operated and maintained by the California Water Service Company and imported water from the Metropolitan Water District (MWD).

Sewer Wastewater – All Three Project Sites

The Project will be served by the Los Angeles County Sanitation District (LACSD) sewer infrastructure. The LACSD maintains and operates the sewer system in the City of Commerce. The Project area is served by the Los Angeles County Sanitation District No. 2. After the sewage is collected locally and delivered to the regional trunk lines, wastewater will flow south toward the Los Coyotes Water Reclamation Plant of LACSD in the City of Cerritos or the Joint Water Pollution Control Plant located in the City of Carson. The Los Coyotes WRP has a design capacity of 37.5 million gallons per day (mgd) and currently processes an average flow of 21.1 mgd. The Joint Water Pollution Control Plant has a design capacity of 400 mgd and currently processes an average flow of 20.4 mgd. The Los Coyotes Water Reclamation Plant currently produces an average recycled water flow of 20.5 million gallons a day (mgd), and the Joint Water Pollution Control Plant currently produces an average recycled water flow of 256.4 mgd.

On December 2, 2019, the LACSD provided "will serve" letters for the Site 1A – Harbor and Site 1B – Jillson 1 sites. On December 4, 2019, they provided a "will serve" letter for the Site 2 – Transportation Center site. The "will serve" letters indicate that the LACSD has adequate capacity and infrastructure to serve the Project sites.

In addition, a Sewer Area Study was prepared for Site 1A – Harbor (5550 Harbor Street), indicating that the existing sewer system analyzed in the area study has a design capacity above the calculated cumulative flow with the Project. The peak discharge at the downstream end of the sewer system 8" pipe entering the County Sanitation District No. 2 existing 33" sewer trunk main is calculated to be a rate of 0.2399 cfs with a flow depth of 2.89 inches. Therefore, the existing sewer system has adequate capacity for the proposed development.

Another Sewer Area Study was prepared for Site 1B – Jillson 1 (5625 Jillson Street) and Site 2 – Transportation Center (5555 Jillson Street), indicating the existing sewer system analyzed in the area study has a design capacity above the calculated cumulative flow for the Project. The peak discharge at the downstream end of the sewer system 8" pipe entering the County Sanitation District No. 2 existing 33" sewer trunk main is calculated to be a rate of 0.20 cfs with a flow depth of 2.97 inches. Therefore, the existing sewer system has adequate capacity for the proposed development.

Storm Drain Wastewater – Site 1A – Harbor (5550 Harbor Street)

Elevations onsite range between approximately 146-feet to 143-feet above mean sea level (msl) with a relatively low point toward the south. The site generally surface flows southeasterly with no signs of existing storm drain inlets on the site. There is an existing 66" Reinforced Concrete Pipe (RCP) Los Angeles County Flood Control District (LACFCD) storm drain located 8-feet north of the centerline of Harbor Street, flowing easterly. It joins an existing 12' wide by 7'-6" deep reinforced box culvert (RCB), flowing southeasterly in a 20' easement along the easterly property line. Both drains are shallow, with only a few feet of cover.

Proposed site drainage will be conveyed as surface flow to the proposed private drive aisles, as well as to a series of area drains connecting to storm drain treatment facilities. Surface flow to the proposed private drive aisles will be captured by two (2) proposed curb-inlet catch basins. Low flows will be directed to the proposed Modular Wetlands System (MWS) Biofiltration vaults for water quality treatment. The treated runoff will then be conveyed to a proposed underground detention system prior to discharging to the existing LACFCD facility. During larger storm events, stormwater runoff will be conveyed to a proposed underground detention system equipped with an orifice to mitigate the peak discharge rate to the allowable peak flowrate (Allowable Q) provided Los Angeles County Department of Public Works (LACDPW). For emergency overflow, the runoff will bubble out of the lowest proposed catch basin located at the southeast corner of the Project site and outlet onto the open space toward Jillson Street.

Although the results of the Hydrology Study demonstrate that the proposed condition of the site will generate a lower peak runoff flowrate than the existing condition of the site, the allowable Q that LA

County provided in comparison to the Q that the proposed condition of the site results in the need for an on-site detention system. The proposed 130 linear feet of 60" pipe for the Project provides storage of 2,553 cubic feet for the detention system, which is greater than the required storage that is calculated to be 2,529 cubic feet. The proposed 6" diameter orifice for the Project site mitigates the peak discharge rate of 1.590 cfs, which complies with the LA County's allowable peak flowrate of 1.766 cfs.

The proposed development will be graded to allow for multiple low points throughout the site equipped with curb inlet catch basins to capture and convey stormwater to the proposed storm drain system. The proposed storm drain system will convey flows to a proposed on-site stormwater pump station. Low flows will be diverted to proposed MWS Biofiltration Vaults prior to entering the proposed storm drain system. In the event the storm drain system becomes clogged, the proposed grading will facilitate emergency overflow out of the lowest proposed catch basin located at the southeast corner of the Project site and outlet onto the open space toward Jillson Street.

Storm Drain Wastewater – Site 1B – Jillson 1 (5625 Jillson Street)

The site generally sheet flows southerly toward Jillson Street. There is an existing Los Angeles County Flood Control District (LACFCD) 12' wide by 7'-6" deep reinforced box culvert (RCB) flowing southeasterly in a 20' easement offsite, along the easterly line of the existing abandoned railroad spur and extending northwesterly along the existing City parking lot. The RCB turns and extends easterly in Jillson Street. The RCB is shallow, with only a few feet of cover. There is an existing catch basin located on the northerly curb line of Jillson Street near the eastern boundary of the site. This catch basin connects to the existing RCB, as described.

Proposed site drainage will be conveyed as surface flow to proposed private drive aisles, as well as to a series of area drains connecting to storm drain treatment facilities. Surface flow to the proposed private drive aisles will be captured by proposed curb-inlet catch basins. Low flows will be directed to the proposed MWS Biofiltration vaults for water quality treatment. The treated runoff will then be conveyed to a proposed underground detention system prior to a pump station, where runoff gets discharge to a parkway drain toward the existing LACFCD facility catch basin on Jillson Street. During larger storm events, stormwater runoff will be conveyed to a proposed underground detention system equipped with an orifice to mitigate the peak discharge rate to the allowable peak flowrate (Allowable Q) provided Los Angeles County Department of Public Works (LACDPW). For emergency overflow, the runoff will bubble out of the lowest proposed catch basin located at the southwest corner of the Project site and outlet onto Jillson Street.

The results of the Hydrology Study demonstrate that the proposed condition of the site will generate a higher peak runoff flowrate than the existing condition of the site. Also, the allowable Q that LA County provided in comparison to the Q that the proposed condition of the site results in the need for an on-site detention system. The proposed 140 linear feet of 60" pipe for the Project provides storage of 2,749 cubic feet for the detention system, which is greater than the required storage that is calculated to be 2,672 cubic feet. The proposed 4" diameter orifice for the Project site mitigates the peak discharge rate of 1.590 cfs, which complies with the LA County's allowable peak flowrate of 1.6224 cfs.

The proposed development will be graded to a single low point of the site equipped with curb inlet catch basins to capture and convey stormwater to the proposed storm drain system. The proposed storm drain system will convey flows to a proposed on-site detention system then to a pump station that pumps out to a parkway drain. Low flows will be diverted to proposed MWS Biofiltration Vaults prior to entering the proposed storm drain system. In the event the storm drain system becomes clogged, the proposed grading will facilitate emergency overflow by draining the Project site out of the proposed catch basin located at the southwesterly corner of the Project site and outlet to a parkway drain on Jillson Street.

Storm Drain Wastewater – Site 2 – Transportation Center (5555 Jillson Street)

The site generally sheet flows southerly toward Jillson Street. There is an existing Los Angeles County Flood Control District (LACFCD) 12' wide by 7'-6" deep reinforced box culvert (RCB) flowing southeasterly offsite, along the easterly line of the existing abandoned railroad spur and extending northwesterly along the existing City parking lot. The RCB turns and extends easterly in Jillson Street. The RCB is shallow, with only a few feet of cover. There is an existing catch basin located on the northerly curb line

of Jillson Street near the eastern boundary of the site. This catch basin connects to the existing RCB, as described.

Proposed site drainage will be conveyed as surface flow to the proposed private drive aisles, as well as to a series of area drains connecting to storm drain treatment facilities. Surface flow to the proposed private drive aisles will be captured by proposed curb-inlet catch basins, and three (3) proposed drop-inlet catch basins. Low flows will be directed to proposed MWS Biofiltration vaults for water quality treatment. The treated runoff will then be conveyed to a proposed underground detention system prior to a pump station, where runoff gets discharge to a parkway drain toward the existing LACFCD facility catch basin on Jillson Street. During larger storm events, stormwater runoff will be conveyed to a proposed underground detention system equipped with an orifice to mitigate the peak discharge rate to the allowable peak flowrate (Allowable Q) provided Los Angeles County Department of Public Works (LACDPW). For emergency overflow, the runoff will bubble out of the proposed catch basin located at the southeast corner of the Project site and outlet onto Jillson Street.

Although the results of the Hydrology Study demonstrate that the proposed condition of the site will generate a lower peak runoff flowrate than the existing condition of the site, the allowable Q that LA County provided in comparison to the Q that the proposed condition of the site results in the need for an on-site detention system. The proposed 150 linear feet of 60" pipe for the Project provides storage of 2,945 cubic feet for the detention system, which is greater than the required storage that is calculated to be 2,916 cubic feet. The proposed 6" diameter orifice for the Project site mitigates the peak discharge rate of 1.924 cfs, which complies with the LA County's allowable peak flowrate of 1.9872 cfs.

The proposed development will be graded to a single low point, the site equipped with curb inlet catch basins to capture and convey stormwater to the proposed storm drain system. The proposed storm drain system will convey flows to a proposed on-site detention system then to a pump station that pumps out to a parkway drain. Low flows will be diverted to proposed MWS Biofiltration Vaults prior to entering the proposed storm drain system. In the event the storm drain system becomes clogged, the proposed grading will facilitate emergency overflow by draining the Project site out of the proposed catch basin located at the southeasterly corner of the Project site and outlet onto Jillson Street.

The Project will comply with the requirements of Chapter 6.17 -- Stormwater and Runoff Pollution Control of the Municipal Code. As such a Preliminary Low Impact Development (LID) Plan has been prepared consistent with the Los Angeles County Department of Public Works LID Manual and the intent of the NPDES stormwater requirements (State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002, dated July 1, 2010) and Los Angeles County Municipal Stormwater/NPDES Permit Order R4-2012-0175. In addition, the applicant will be required to prepare a Stormwater Pollution Preventions Program (SQPPP) pursuant to the General Construction Activity NPDES regulations.

The Project design and compliance with existing federal, state, and local water quality laws and regulations related to water quality and waste discharge standards will ensure a **less than significant impact,** directly, indirectly, and cumulatively to water quality and discharge.

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

Response:

Grading for the Project will not extend to depths where groundwater can be encountered. As noted above, construction on the Project sites will comply with the requirements of Chapter 6.17 -- Stormwater and Runoff Pollution Control of the Municipal Code. As such a Preliminary Low Impact Development (LID) Plan has been prepared consistent with the Los Angeles County Department of Public Works LID Manual and the intent of the NPDES stormwater requirements (State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002, dated July 1, 2010) and Los Angeles County Municipal Stormwater/NPDES

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Permit Order R4-2012-0175. In addition, the applicant will be required to prepare a Stormwater Pollution Preventions Program (SQPPP) pursuant to the General Construction Activity NPDES regulations.

The Project will be served by Cal Water through existing water lines and will not impact groundwater. The Project will be required to comply with City's water-efficiency requirements, including the use of drought-tolerant planting materials and limited landscaping irrigation, as well as all water restrictions imposed by the Los Angeles County Department of Public Works (LACDPW) at the time the Project is constructed. Implementation of these and other applicable requirements, including those noted in Response X a) above, will assure that water-related impacts to groundwater recharge are reduced to **less than significant**, directly, indirectly, and cumulatively.

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 substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

Response:

There are no natural drainages on the Project sites, and therefore the Project will not alter any existing drainage patterns that would lead to on- or off-site siltation or erosion. Project construction will be limited to the three Project sites. The closest body of water to the Project sites is the Los Angeles River located over a mile to the southwest of the Project site.

The Project, once built, will change the site's drainage patterns. Currently, the three sites are developed with buildings. The Project proposes the demolition of these structures and the construction of new buildings and parking areas. Following the development, the majority of the site, except for the landscaped areas, will be covered over in impervious surfaces.

The Project will comply with the requirements of Chapter 6.17 -- Stormwater and Runoff Pollution Control of the Municipal Code. As such a Preliminary Low Impact Development (LID) Plan has been prepared consistent with the Los Angeles County Department of Public Works LID Manual and the intent of the NPDES stormwater requirements (State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002, dated July 1, 2010) and Los Angeles County Municipal Stormwater/NPDES Permit Order R4-2012-0175.

The property owner shall have primary responsibility and significant authority for the implementation, maintenance, and inspection of the property BMPs. Duties of the Owner include but are not limited to:

- Implementing all elements of the LID, including but not limited to:
  - Implementation of prompt and effective erosion and sediment control measures
  - Implementing all non-stormwater management, and materials and waste management activities, such as monitoring, discharges, general site clean-up; vehicle and equipment cleaning, spill control; good construction housekeeping to ensure that no materials other than stormwater are discharged which may have an adverse effect on receiving waters or storm drain systems, etc.
- Pre-storm inspections
- Storm event inspections
- Post-storm inspections
- Routine inspections as described in the LID
- Ensuring elimination of all unauthorized discharges
- The Owner shall be assigned authority to mobilize crews in order to make immediate repairs to the control measures.
- Coordinate all of the necessary corrections/repairs are made immediately, and that the project complies with the LID at all times.
- Managing and report any Illicit Connections or Illegal Discharges.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
The implementation of Best Management Practices (BMPs) required by the City and implemented through the Project's Low Impact Development (LID) Plan will mitigate potential erosion impacts to **less than significant,** directly, indirectly, and cumulatively.				
ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite?	☐	☐	☒	☐
Response: In addition to Response X a) & b) above, the design and implementation of the basins will be reviewed and approved by the City Engineer as well as the Los Angeles County Department of Public Works (LACDPW) to assure compliance with all applicable local, state, and Federal standards. Implementation of these and other applicable requirements will assure that drainage and stormwater will not create or contribute water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the Project will have a **less than significant impact**, directly, indirectly, or cumulatively to the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.				
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
Response: See Response X a) & b) above.				
iv) Impede or redirect flood flows?	☐	☐	☒	☐
Response: No signs of flooding were observed when Alta did their field investigation for the Geotechnical Investigation. Proposed site drainage will be conveyed as described in Response X a) above. su As described throughout this section X, the Project will be required to comply with all applicable water quality standards. To further minimize potential water quality degradation, the Project will be connected to the sewer system and on-site/off-site stormwater conveyance system. Project-related water quality degradation impacts will be **less than significant**, directly, indirectly, and cumulatively.				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
Response: A seiche and tsunami are defined below. Since the Project site is not located near a body of water or the ocean, the Project is not subject to these hazards. <u>A seiche</u> is a temporary disturbance or oscillation in the water level of a lake or partially enclosed body of water, especially one caused by changes in atmospheric pressure. <u>Tsunami</u> is a long high sea wave caused by an earthquake, submarine landslide, or other disturbance. The Project site is not located within a 100-year mapped flood zone (FEMA Flood Insurance Rate Map No. 06037C1815F (September 26, 2008). The Project would redirect on-site drainage patterns; however, it would not impede or redirect flood flows. As referenced, all drainage would be managed to ensure pre-construction flows off-site are maintained. The Project would not expose people or structures to flood hazards from severe storm events. Compliance with existing Federal, State, and local flood hazard laws and regulations as they pertain to the design of the Project will result in a **less than significant** flood hazard impact, directly, indirectly, and cumulatively.				

ISSUES & SUPPORTING INFORMATION SOURCES:	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?	☐	☐	☒	☐

Response:

As noted throughout this Section, the Project will comply with all City, County, State, and Federal requirements for water quality and sustainable groundwater. Compliance with existing Federal, State, and local flood hazard laws and regulations as they pertain to the design of the Project will result in a **less than significant** flood hazard impact, directly, indirectly, and cumulatively.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. https://library.municode.com/ca/commerce/codes/code_of_ordinances?nodeId=TIT6HESA_CH6.18FLMARE Chapter 6.18 – Floodplain Management Requirements
5. Chapter 13.04 – Sewers
6. FEMA Flood Map Service Center: Search By Address website, accessed March 22, 2020
7. Los Angeles County Department of Public Works LID Manual
8. State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002 dated July 1, 2010
9. Los Angeles County Municipal Stormwater/NPDES Permit Order R4-2012-0175
10. Preliminary Geotechnical Investigation 5550 Harbor Street, 5625 Jillson Street and 5555 Jillson Street, Commerce 1A, 1B and 2 – prepared by Alta California Geotechnical Inc., October 21, 2019
11. Preliminary Hydrology Study TTM 82890 5550 Harbor Street – prepared by C&V Consulting, Inc., November 2019
12. Preliminary Hydrology Study TTM 82891 5625 Jillson Street – prepared by C&V Consulting, Inc., December 2019
13. Preliminary Hydrology Study TTM 82892 5555 Jillson Street – prepared by C&V Consulting, Inc., December 2019
14. Preliminary Low Impact Development (LID) Plan 5550 Harbor Street – prepared by C&V Consulting, Inc., December 2019
15. Preliminary Low Impact Development (LID) Plan 5625 Jillson Street – prepared by C&V Consulting, Inc., December 2019
16. Preliminary Low Impact Development (LID) Plan 5555 Jillson Street – prepared by C&V Consulting, Inc., December 2019
17. Sewer Area Study TTM No. 82890 PC 3067 SMD Index 1915, 1916 – prepared by C&V Consulting, Inc., April 2020
18. Sewer Area Study TTM No. 82891 PC 87-1 SMD Index 1916 – prepared by C&V Consulting, Inc., April 2020

XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐

Response:

The three Project sites are currently developed with warehouse/office buildings and the City's Transportation Center. The sites are generally surrounded by single-family residential and a school to the north, the Aquatic Center, and City Hall to the east, commercial and parking areas to the south, and warehouse with manufacturing to the west.

The Project sites are General Plan designated for the Housing Opportunity land use designation and located within the Rosewood Planning Area. This land use designation permits the existing manufacturing uses to recycle to residential development. At such time the property owner determines industrial

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

uses are no longer economically viable, the property must transition to residential uses. The permitted residential development densities range from 0 to 27 units per acre, yielding a population density of approximately 103 persons per acre.

The development of additional single-family attached residences will not divide an existing community, but rather will expand an existing community by redeveloping an area of underutilized office/warehouse and manufacturing uses and providing much-needed housing opportunities.

Pursuant to the City's General Plan, the land use designation of Housing Opportunity is consistent with the proposed M-2 -- Heavy Industrial and HOO – Housing Opportunity Overlay Zoning category; therefore, a **less than significant impact** either directly, indirectly or cumulatively will occur to an established community.

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?	☐	☐	☒	☐

Response:

The Project will be a single-family attached residential development, consistent with the existing land use designation, supporting the General Plan's goals and policies relating to a variety of housing types and intensities. The Project will not result in a change to plans, policies, or regulations established in the General Plan or Zoning Ordinance; therefore, **less than significant impact,** directly, indirectly or cumulatively to any land use plans or zoning will occur.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code

XII. MINERAL RESOURCES – Would the project:

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

Response:

The City is not located within a Significant Mineral Aggregate Resource Area, nor is it located in an area with active mineral extraction activities. As well, the Project sites are not used for mineral, oil, or energy extraction. The Surface Mining and Reclamation Act (SMARA) Mineral Land Classification system, designates the City as being located in the San Gabriel Production-Consumption Region identified as the Portland cement concrete-grade aggregate. However, as indicated in the San Gabriel Valley P-C region MRZ-2 map, the Project site is not located in an area where there are significant aggregate resources present. In addition, the Project sites are not located in an area with active mineral extraction activities.

Since the Project site occurs in an urban setting and is not suitable for mineral resource land uses, the Project will have a **less than significant impact**, directly, indirectly, and cumulatively to mineral resources.

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?	☐	☐	☐	☒

Response:

The Project site is not delineated on a local general plan, specific plan, or other land-use plan. It will, therefore, have **no impact**, directly, indirectly, and cumulatively to the availability of important mineral resources.

Sources:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. California Department of Conservation California Geologic Survey CGS Information Warehouse: Mineral Land Classification, GIS, accessed March 22, 2020
5. Preliminary Geotechnical Investigation 5550 Harbor Street, 5625 Jillson Street and 5555 Jillson Street, Commerce 1A, 1B and 2 – prepared by Alta California Geotechnical Inc., October 21, 2019

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?	☐	☒	☐	☐

Response:

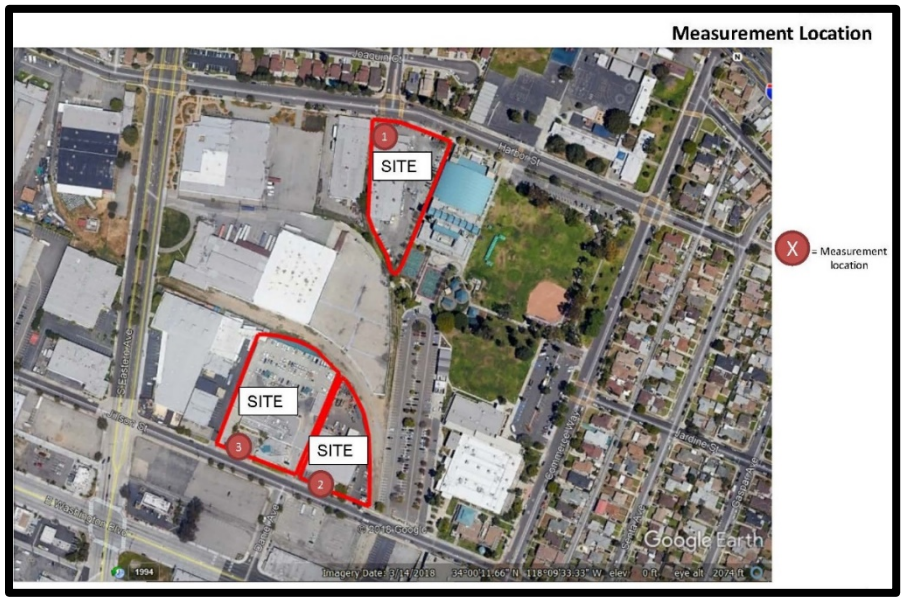
A Noise Impact Study was prepared for the Project by MD Acoustics. The results follow below.

Existing Noise Environment

Three (3) 24-hour ambient noise measurements were conducted at the Project sites. Noise measurements were taken to determine the existing ambient noise levels. Noise data indicates that traffic along Harbor Street and Jillson Street are the primary sources of noise impacting the sites and the surrounding area.

Long-Term Noise Measurement Results

The noise data ranges from 59.5 to 68.4 dBA CNEL. Noise data indicates the ambient noise levels range between 58.8 to 64.7 dBA Leq. The measured noise levels and field notes indicate that traffic noise is the main source of noise impacting the Project sites



Future Noise Environment Impacts and Mitigation

This assessment analyzes future noise impacts on the Project and compares the results to the City's Noise Standards. The analysis details the estimated exterior noise levels associated with traffic from adjacent roadway sources.

Off-site Traffic Noise Impact

The potential off-site noise impacts caused by the increase in vehicular traffic as a result of the Project were calculated at a distance of 50 feet. The distance to the 55, 60, 65, and 70 dBA CNEL noise contours are also provided for reference. The noise level at 50 feet is representative of approximate distances to existing homes along the subject roadway. The noise contours were calculated for the following scenarios and conditions:

- Existing Condition: This scenario refers to the existing year traffic noise condition and is demonstrated in the table below.
- Existing + Project Condition: This scenario refers to the existing year plus project traffic noise condition and is demonstrated in the table below.

Existing + Project Scenario Comparison

The table below provides the Existing and Existing + Project noise conditions and shows the change in noise level as a result of the proposed Project. As shown in the table, the increase in traffic noise for the Existing and Existing + Project scenario would have a slight increase of 0.2 dBA at Site 1A – Harbor (5550 Harbor Street), 0.5 dBA at Site 1B – Jillson 1 (5625 Jillson Street), and 0.3 dBA at Site 2 – Transportation Center (5555 Jillson Street) at 50 feet from the centerline of the subject roadway. Since nearby roads like S Eastern Ave and I-5 have a significant impact on the sites, this increase will likely be imperceptible at all sites.

Existing Scenario – Noise Levels Along Roadways (dBA, CNEL)

Roadway	Site	CNEL at 50 Ft (dBA)	Distance to Contour (Ft)			
			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
Harbor St	Site 1A – Harbor (5550 Harbor Street)	59.5	4	14	45	142
Jillson St	Site 1B – Jillson 1 (5625 Jillson Street)	60.0	5	16	50	157
Jillson St	Site 2 – Transportation Center (5555 Jillson Street)	60.0	5	16	50	157

Existing With Project Exterior Noise Levels

Roadway	Site	CNEL at 50 Ft (dBA)	Distance to Contour (Ft)			
			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
Harbor St	Site 1A – Harbor (5550 Harbor Street)	59.7	5	15	46	147
Jillson St	Site 1B – Jillson 1 (5625 Jillson Street)	60.3	5	17	53	168
Jillson St	Site 2 – Transportation Center (5555 Jillson Street)	60.5	6	18	50	159

Change in Existing Noise Levels as a Result of Project

Roadway[1]	Site	CNEL at 50 Feet dBA[2]			
		Existing Without Project	Existing With Project	Change in Noise Level	Potential Significant Impact
Harbor St	Site 1A – Harbor (5550 Harbor Street)	59.5	59.7	0.2	NO
Jillson St	Site 1B – Jillson 1 (5625 Jillson Street)	60.0	60.3	0.3	NO

Jillson St	Site 2 – Transportation Center (5555 Jillson Street)	60.0	60.5	0.5	NO

Notes:
[1] Exterior noise levels calculated at 5 feet above ground level.
[2] Noise levels calculated from the centerline of the subject roadway.

On-site Traffic Noise Impact

The onsite traffic noise impact on the Project sites will range between 60 to 65 dBA CNEL, which is consistent with the City's General Plan Noise Element for residential uses. No additional mitigation is required for exterior areas (e.g., patios).

Interior Noise Levels

The future interior noise level was calculated for the sensitive receptor locations using a typical "windows open" and "windows closed" condition. A "windows open" condition assumes 12 dBA of noise attenuation from the exterior noise level. A "windows closed" condition" assumes 20 dBA of noise attenuation from the exterior noise level. The table below reflects the first and second-floor interior noise levels for the Project sites.

Future Interior Noise Levels (dBA CNEL)

Location	Roadway Noise Source	Noise Level at Building Facade[1]	Interior Noise Reduction Required to Meet Interior Noise Standard of 45 dBA CNEL	Interior Noise Level w/ Typical Residential Windows (STC≥ 25)		STC Rating for Windows Facing Subject Roadway[4]
				Window Open[2]	Windows Closed[3]	
1st Row Units Along Harbor Site Property Line	Harbor St	60.0	13.8	46.8	38.8	28
1st Row Units Along Jillson Site 1 Property Line	Jillson St	64.7	19.7	52.7	44.7	28
1st Row Units Along Jillson Site 2 Property Line	Jillson St	65.0	20.0	53.0	45.0	28

Notes:
[1.] Noise level projected based on traffic noise projections from Table 2, see Appendix A.
[2.] A minimum of 12 dBA noise reduction is assumed with a "windows open" condition.
[3.] A minimum of 20 dBA noise reduction is assumed with a "windows closed" condition.
[4.] Indicates the required STC rating to meet the interior noise standard.

As shown in the table, the interior noise level will range from 46.8 to 53.0 dBA CNEL with the windows open and 38.8 to 45.0 dBA CNEL with the windows closed.

To meet the City's interior 45 dBA CNEL standard, a "windows closed" condition is required. The windows and sliding glass doors directly facing Jillson Street or Harbor Street will require a minimum STC rating of 28 (**MM NOI-1**). A "windows closed" condition simply means that in order to achieve a 45 dBA CNEL interior noise level, the windows must be closed and does not mean the windows must be fixed.

Therefore, the Project will have a **less than significant impact with mitigation** on interior noise.

MM NOI-1: The Project will require a minimum of windows with an STC rating of 28 or higher to meet the City's 45 dBA CNEL requirement.

Construction Noise Impact

The degree of construction noise may vary for different areas of the Project sites and also vary depending on the construction activities. Noise levels associated with the construction will vary with the different

phases of construction. The construction noise and vibration level projections are provided in the sections below.

Construction Noise

The Environmental Protection Agency (EPA) has compiled data regarding the noise generated characteristics of typical construction activities. The data is presented in the table below.

Typical Construction Noise Levels[1]

Equipment Powered by Internal Combustion Engines

Type	Noise Levels (dBA) at 50 Feet
Earth Moving	
Compactors (Rollers)	73 - 76
Front Loaders	73 - 84
Backhoes	73 - 92
Tractors	75 - 95
Scrapers, Graders	78 - 92
Pavers	85 - 87
Trucks	81 - 94
Materials Handling	
Concrete Mixers	72 - 87
Concrete Pumps	81 - 83
Cranes (Movable)	72 - 86
Cranes (Derrick)	85 - 87
Stationary	
Pumps	68 - 71
Generators	71 - 83
Compressors	75 - 86

Impact Equipment

Type	Noise Levels (dBA) at 50 Feet
Saws	71 - 82
Vibrators	68 - 82

Notes:
[1] Referenced Noise Levels from the Environmental Protection Agency (EPA)

Construction is anticipated to occur during the permissible hours, according to the City's Municipal Code. Construction noise is considered a short-term impact and would be considered significant if construction activities are taken outside the allowable times, as described in the County's Municipal Code (12.08.440). Construction noise will have a temporary or periodic increase in the ambient noise level above the existing within the project vicinity. Furthermore, noise reduction measures are provided to reduce construction noise further. Construction noise level projections are provided in the table below.

Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during the grading phase at 80.5 dBA at the nearest sensitive receptor. Site 1 is 100 feet to the nearest sensitive receptor, site 2 is 118 feet to the nearest sensitive receptor, and site 3 is 400 feet from the nearest sensitive receptor.

Construction Noise Levels

Site 1A – Harbor (5550 Harbor Street)

Phase	Construction Noise Level[1]	Ambient Leq(h)	Reduction with Mufflers	Mitigated Noise Level	Increase from Ambient	Exceeds Standard with Reduction Measures?
Demo	80.5	58.8	-15	66.3	7.5	NO
Site Preparation	78.6	58.8	-15	64.8	6.0	NO
Grading	78.6	58.8	-15	64.8	6.0	NO

Building Construction	74.8	58.8	-15	62.3	3.5	NO
Paving	79.9	58.8	-15	65.9	7.1	NO
Architectural Coating	70.0	58.8	-15	60.3	1.5	NO

Site 1B – Jillson 1 (5625 Jillson Street)

Phase	Construction Noise Level[1]	Ambient Leq(h)	Reduction with Mufflers	Mitigated Noise Level	Increase from Ambient	Exceeds Standard with Reduction Measures?
Demo	79.0	58.8	-15	65.1	6.3	NO
Site Preparation	77.2	58.8	-15	63.8	5.0	NO
Grading	77.2	58.8	-15	63.8	5.0	NO
Building Construction	73.3	58.8	-15	61.6	2.8	NO
Paving	78.4	58.8	-15	64.7	5.9	NO
Architectural Coating	68.6	58.8	-15	59.9	1.1	NO

Site 2 – Transportation Center (5555 Jillson Street)

Phase	Construction Noise Level[1]	Ambient Leq(h)	Reduction with Mufflers	Mitigated Noise Level	Increase from Ambient	Exceeds Standard with Reduction Measures?
Demo	68.4	58.8	-15	59.9	1.1	NO
Site Preparation	66.6	58.8	-15	59.6	0.8	NO
Grading	66.6	58.8	-15	59.6	0.8	NO
Building Construction	62.7	58.8	-15	59.1	0.3	NO
Paving	67.8	58.8	-15	59.8	1.0	NO
Architectural Coating	58.0	58.8	-15	58.9	0.1	NO

Notes:
1. Distance projected from edge of site to nearest sensitive receptor.
2. Calculations using the FTA noise and vibration manual.

To ensure that construction activities do not disrupt the adjacent land uses, mitigation measures for noise reduction **MM NOI-2** through **MM NOI-6** shall be required.

These requirements will reduce the grading level to 66.3 dBA, 65.1 dBA, and 59.9 dBA at the nearest sensitive receptor for each site, respectively. The requirements will temporarily increase the ambient level at the nearby neighborhoods across Harbor Street 7.5 dBA as a worst-case scenario. These requirements are within the LA County Code for mobile equipment given in section 12.08.440 of not exceeding 75 dBA.

The Project will have a **less than significant with mitigation impact** of the generation of temporary or permanent increases in ambient noise levels in the vicinity of the Project.

MM NOI-2: Construction shall occur during the hours of 7:00 AM to 7:00 PM.

MM NOI-3: Stationary construction noise sources such as generators or pumps should be located as far as feasibly possible from any existing adjacent residential or sensitive units, as feasible.

MM NOI-4: Construction staging areas should be located as far as feasibly possible from any adjacent sensitive land uses, as feasible.

MM NOI-5: During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices and mufflers, which reduce the operational noise 15 dB.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MM NOI-6: Equipment shall be maintained so that vehicles and their loads are secured from rattling and banging.				
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Response:

Construction activities can produce a vibration that may be felt by adjacent land uses. The construction of the proposed project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet, which is perceptible but below any risk to architectural damage.

The fundamental equation used to calculate vibration propagation through average soil conditions and distance is as follows:

$$PPV_{equipment} = PPV_{ref} (100/D_{rec})^{n}$$

Where: PPV_{ref} = reference PPV at 100ft.
D_{rec} = distance from equipment to receiver in ft.
n = 1.1 (the value related to the attenuation rate through ground)

The thresholds from the Caltrans Transportation and Construction Induced Vibration Guidance Manual in the table below provides general thresholds and guidelines as to the vibration damage potential from vibratory impacts.

Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Table 19, Transportation and Construction Vibration Guidance Manual, Caltrans, Sept. 2013.
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

The table below gives approximate vibration levels for particular construction activities. This data provides a reasonable estimate for a wide range of soil conditions.

Vibration Source Levels for Construction Equipment[1]

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

[1] Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006.

At a distance of 100 feet, a large bulldozer would yield a worst-case 0.019 PPV (in/sec), which slightly perceptible, but sustainably below any risk of damage (0.5 in/sec PPV is the threshold of residential structures). The impact is less than significant, and no mitigation is required. As the library is further from the other sites than the residences are from Harbor, all sites are below any risk of damage to nearby receptors. The impact is **less than significant**, and no mitigation is required.

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?	☐	☐	☐	☒

Response:

The Project is not located within a Los Angeles County Airport Land Use Commission (ALUC) area. The City is not located within two miles of an operational public airport. The nearest airport is El Monte Airport, located approximately seven miles to the southwest. The nearest major airport is located in Long Beach, approximately eighteen miles to the southeast. Los Angeles International Airport (LAX) is located approximately 28 miles to the northwest.

Given the above information, the Project will have **no impact** on exposing people to excessive airport noise levels.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Section 19.19.160 – Noise of the Commerce Municipal Code
5. Los Angeles County Airport Land Use Commission website and GIS mapping – accessed March 22, 2020
6. Jillson and Harbor Sites Residential Development Noise Impact Study – prepared by MD Acoustics LLC, December 20, 2019

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 road or other infrastructure)?	☐	☐	☒	☐

Response:

The Project will not induce growth as it is consistent with the City's General Plan land use designation of Housing Opportunity. The City's General Plan establishes the development potential of the City to accommodate the City's growth. The Project, as proposed, will help to accommodate that growth, but will not induce it.

The development of the site will result in medium-density housing, which is consistent with the City of General Plan. The Project site is located on existing streets, and utilities and public facilities are all available in the immediate area. No new road or utility infrastructure is required. Project-related impacts are expected to be **less than significant.**

b) Displace substantial numbers of existing people or housing, necessitating the	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
construction of replacement housing elsewhere?				

Response:

The Project site is currently developed with the City's Transportation Center and office/warehouse buildings. The Project will not displace any persons, or require the construction of replacement housing. Therefore, there is **no impact** on housing.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code

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:

i)	Fire protection?	☐	☐	☒	☐

Response:

The City of Commerce contracts with the Los Angeles County Fire Department for fire protection and prevention services in the City. The existing contract between the City and the county calls for the staffing of the three fire stations within the boundaries of the City.

The Project is located approximately 1.7 miles from both Fire Station #22 located at 928 South Gerhart Street and Fire Station #17, located at 6031 Rickenbacker Road. The average response time is five (5) minutes consistent with the Health & Safety Policy 2.1, which read as follows: The City of Commerce will strive to respond to all in-City emergency incidents within a five-minute or less response time. In addition, the Fire Department will approve the Project site plan to ensure it meets applicable fire standards and regulations.

The Fire Department will review the Project for compliance with all Fire Codes. Through the implementation of all regulations and City policies for development projects, the Project will have a **less than significant** impact on fire services, directly, indirectly, and cumulatively.

ii)	Police protection?	☐	☒	☐	☐

Response:

Law enforcement services in the City of Commerce are provided under contract by the Los Angeles County Sheriff's Department. The Sheriff's Department currently operates out of a facility located at 5019 East Third Street in unincorporated East Los Angeles. The current contract calls for 26 law enforcement personnel to be assigned to the City. Included in the contract are one team leader, 10 general law enforcement officers, two traffic enforcement personnel, and one detective. Remaining personnel may be assigned as the City requires.

The Sheriff's Department will review the Project for compliance with all Safety Codes. The proposed Project could place additional demands on law enforcement services due to the nature of the Project; therefore, mitigation is required (**MM PS-1** and **MM PS-2**).

Through the implementation of all regulations and City policies for development projects, the Project will have a **less than significant impact with mitigation** on police services, directly, indirectly, and cumulatively.

MM PS-1: Prior to building permit issuance, the final site plan, elevations, building floor plans, and site circulation shall be reviewed by the Los Angeles County Sheriff's Department to ensure it conforms to their operational requirements.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

MM PS-2: Prior to occupancy, the developer will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.

iii) Schools?	☐	☐	☒	☐

Response:

The Project is located within the service area boundary of the Montebello Unified School District. The Rosewood Park Elementary School (2353 South Commerce Way) is located approximately 79-feet from the closest point of Site 1A – Harbor (5550 Harbor Street) and the closest property line of the school site or .06 of a mile. The closest point of Site 2 – Transportation Center (5555 Jillson Street), the furthest site, and the closest property line of the school site is 897-feet or .72 of a mile.

The Project is required to pay the state-mandated school fees in place at the time that development occurs. These fees are designed to mitigate impacts to schools by providing funds for the construction of new facilities. Through the implementation of all regulations and City and School District policies for development projects, the Project will have a **less than significant** impact on schools, directly, indirectly, and cumulatively.

iv) Parks?	☐	☐	☒	☐

Response:

The City of Commerce Park and Recreation Department maintains and operates five parks at present: Rosewood Park, Bandini Park, Bristow Park, Veteran's Memorial Park, and Pacific Mini-Park. The combined land area of the five parks total approximately 36 acres, and the parks include a wide range of recreational facilities. A large indoor swimming facility is located adjacent to the Civic Center in Rosewood Park. Community meeting rooms are also available at the four community parks. A large sports center and a marksmanship range are located at Veteran's Memorial Park.

The Project will provide private open space for the residents. Through the implementation of all regulations and City policies for development projects, the Project will have a **less than significant** impact on parks, directly, indirectly, and cumulatively.

v) Other public facilities?	☐	☐	☒	☐

Response:

The Project will result in a minor increase in demand for City services and facilities, including recreational trails and library services. This increase is consistent with the General Plan projections for these facilities and will be offset by the increased property and sales tax generated by the build-out of the Project. Therefore, impacts to other public facilities are **less than significant**, directly, indirectly, and cumulatively.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code

XVI. RECREATION – Would the project:

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?	☐	☐	☒	☐

Response:

The City of Commerce Park and Recreation Department maintains and operates five parks at present: Rosewood Park, Bandini Park, Bristow Park, Veteran's Memorial Park, and Pacific Mini-Park. The combined land area of the five parks total approximately 36 acres, and the parks include a wide range of recreational facilities. A large indoor swimming facility is located adjacent to the Civic Center in Rosewood Park. Community meeting rooms are also available at the four community parks. A large sports

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
center and a marksmanship range are located at Veteran's Memorial Park. In particular, Rosewood Park is located just across Harbor Street to the north from the Project site. The Project will provide private open space for the residents. Through the implementation of all regulations and City policies for development projects, the Project will have a **less than significant** impact on parks, directly, indirectly, and cumulatively.				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that have an adverse physical effect on the environment?	☐	☐	☐	☒
Response: The Project does provide some open space areas. It will not require the construction or expansion of recreational facilities as the site was planned for residential development under the General Plan Vision 2010. Therefore, the Project will have **no impact** on recreational facilities, causing the adverse effect of the environment.				
Sources: 1. City of Commerce 2020 General Plan, adopted January 2008 2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008 3. Title 19 – Zoning of the Commerce Municipal Code				
XVII. TRANSPORTATION – Would the project:				
a) Conflict with program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
Response: **STREET/HIGHWAY FACILITIES** The Project sites are located off of Harbor Street and Jillson Street. The General Plan defines Harbor Street as a Collector Street and Jillson Street as a Local Street. The street designations are defined as noted below. ➢ Collector Streets. Collector Street provides circulation in a defined geographic area of the City and connects this area to secondary streets, arterials, and freeways. Most traffic uses collector streets to move to roadways carrying intra-City or through-traffic. The City of Commerce contains two types of collector streets: *commercial/ industrial* and *residential. Commercial/industrial* collectors contain 44 feet of paving within a 60-foot right-of-way; curb parking is permitted on both sides of the street. Collector streets serving residential neighborhoods have 40 feet of paving within the same 60-foot right-of-way. Residents may park along the curb. Collector streets in Commerce include Goodrich Boulevard, Simmons Avenue, Ferguson Drive, **Harbor Street**, and Commerce Way. ➢ Local Streets. Local streets are subordinate to the basic circulation network, yet constitute the majority of the City's streets. These streets provide access to individual parcels and only provide circulation within a neighborhood block. Local streets in Commerce are generally 40 to 50 feet wide, with a pavement width of between 24 to 30 feet. Most streets have been improved with curbs, gutters, and sidewalks. The City standard for local streets is 60 feet (with a curb-to-curb pavement width of 36 feet, two lanes, and on-street parking on both sides). This standard has not been achieved for a number of local streets in the City and may not be achieved for all local streets, considering the developed character of the City. **Jillson Street** is a Local Street. Harbor Street currently is 83-feet in width with a curb-to-curb width of 56-feet providing one traffic lane in each direction. Jillson Street currently has 60-feet of right-ow-way with a curb-to-curb dimension of 40-feet providing one traffic lane in each direction. Therefore, additional right-of-way is not required for the Project.				

TRIP GENERATION AND DISTRIBUTION

The Project will be built in phases with an initial opening year in 2020 and completion in 2022. The Project consists of three (3) multi-family townhome sites consisting of 133 total dwelling units:

- Site 1A – Harbor (5550 Harbor Street) - 37 dwelling units (2-3 phases)
- Site 1B – Jillson 1 (5625 Jillson Street) - 31 dwelling units (2 phases)
- Site 2 – Transportation Center (5555 Jillson Street) - 65 dwelling units (3-4 phases)

Project Trip Generation

Projected trip generation for the proposed Project was based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition). Based on the proposed Project's intended use, the projected trip generation was determined using the Multifamily Housing (Mid-Rise) Land Use Code 221.

PROJECTED TRIP GENERATION

Proposed Land Use	Qty	Unit	Daily Trips (ADTs)		AM Peak Hour					PM Peak Hour				
			Rate	Volume	Rate	In:Out Split	Volume			Rate	In:Out Split	Volume		
							In	Out	Total			In	Out	Total
Multi-Family Housing (221)	37.0	DU	5.44	201	0.36	26:74	4	10	14	0.44	61:39	10	7	17
Multi-Family Housing (221)	36.0	DU	5.44	196	0.36	26:74	3	10	13	0.44	61:39	10	6	16
Multi-Family Housing (221)	72.0	DU	5.44	392	0.36	26:74	7	19	26	0.44	61:39	20	12	32
Total				**789**			**14**	**39**	**53**			**40**	**25**	**65**

Notes: Rates from ITE Trip Generation (10th Edition, 2017); DU – Dwelling Unit

As shown in the table above, the proposed project is projected to generate a total of 53 AM peak hour trips, 65 PM peak hour trips, and 789 daily trips.

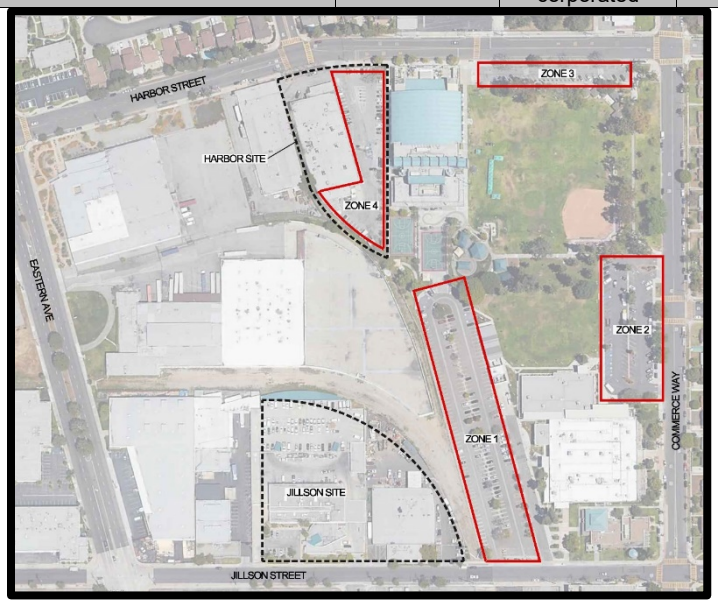
Project Trip Distribution

Project trip distribution involves the process of identifying probable destinations and traffic routes that would be utilized by the proposed Project's traffic. The potential interaction between the proposed land use and surrounding regional access routes are considered to identify the probable routes onto which project traffic would distribute. The projected trip distribution for the proposed Project is based on anticipated travel patterns to and from the Project sites.

Transtech Engineering reviewed the trip generation and distribution for the Project. It determined that a full traffic analysis with a level of service analysis at major intersections was not warranted because the proposed Project will have a **less than significant impact** directly, indirectly, and cumulatively on the City roadway systems.

ON-SITE AND OFF-SITE PARKING

As the Project will share parking with the Brenda Villa Aquatic Center, a parking survey was conducted in the area neighboring the Project sites from 7:00 AM to 7:00 PM on Saturday, November 16th, 2019, and on Tuesday, November 19th, 2019. For analysis purposes, the neighboring parking areas were separated into distinct parking zones found in the Focused Traffic Study. The zones consist of the four parking lots that serve Rosewood Park, Commerce Civic Center Area, and the Brenda Villa Aquatic Center as well as street parking found along Harbor Street and Jillson Street. In total, all neighboring parking areas provide a total of 524 parking spaces.



To identify peak parking demand, the survey was conducted in one-hour intervals. The weekday peak parking demand in the study area occurred at 6:00 PM when a total of 266 spaces were occupied (51% occupancy). The highest occupancy among the different parking zones occurred at 6:00 PM when a total of 55 spaces were occupied (92% occupancy) within Parking Zone 4.

The Site 1A – Harbor (5550 Harbor Street) will replace Parking Zone 4, resulting in a loss of 60 parking spaces. However, the remaining parking zones are projected to accommodate the loss of 60 spaces, as a total of 258 spaces remained unoccupied during the peak weekday parking demand. All parking zones and parking lots provide easy pedestrian accessibility to Rosewood Park, Commerce Civic Center Area, and the Brenda Villa Aquatic Center.

The weekend peak parking demand in the study area occurred at 2:00 PM when a total of 155 spaces were occupied (30% occupancy). The highest occupancy among the different parking zones occurred at 3:00 PM when a total of 35 spaces were occupied (76% occupancy) within Parking Zone 3.

As mentioned earlier, Site 1A – Harbor (5550 Harbor Street) will replace Parking Zone 4, resulting in a loss of 60 parking spaces. However, the remaining parking zones are projected to accommodate the loss of 60 spaces, as a total of 369 spaces remained unoccupied during the peak weekend parking demand. All parking zones and parking lots provide easy pedestrian accessibility to Rosewood Park, Commerce Civic Center Area, and the Brenda Villa Aquatic Center.

On-Site Parking

Section 19.21.040 – Number of Parking Space Required of the Commerce Municipal Code outlines the City's minimum parking requirements for various land use classifications. The table below summarizes the minimum on-site parking requirements for the proposed Project.

MUNICIPAL CODE ON-SITE PARKING REQUIREMENTS

Project Site	Type of Parking	Land Use	Units	Required Parking Spaces/Unit	Total Spaces Required	Total Spaces Provided
Site 1A – Harbor (5550 Harbor Street)	Garage	Multifamily	37	2.0	74	74
	Guest			0.5	18.5	11
Site 1B – Jillson 1 (5625 Jillson Street)	Garage	Multifamily	31	2.0	62	62
	Guest			0.5	15.5	7

Site 2 – Transportation Center (5555 Jillson Street)	Garage	Multifamily	65	2.0	130	130
	Guest			0.5	32.5	25
Site 1B – Jillson 1 (5625 Jillson Street) & Site 2 – Transportation Center (5555 Jillson Street)	Garage	Multifamily	96	2.0	192	192
	Guest			0.5	48	23

As shown in the table above, the total required spaces for the Site 1A – Harbor (5550 Harbor Street) is 74 garage spaces and 18.5 guest spaces. The total required spaces for the Site 1B – Jillson 1 (5625 Jillson Street) is 192 garage spaces and 48 guest spaces. Guest parking can be accommodated off-site as the existing parking survey showed Harbor Street and Jillson Street to have max occupancy rates of 43% and 63%, respectively. These occupancy rates amount to a total of 36 unoccupied spaces on Harbor Street and 22 unoccupied spaces on Jillson Street. Guest parking could also be accommodated in the surrounding parking lots; it should be noted, a shared parking agreement will be developed for these surrounding parking lots.

With the proposed mitigation **MM TRAF-1** to ensure shared parking, the Project will have a **less than significant with mitigation impact** directly, indirectly, and cumulatively on parking.

MM TRAF-1: Prior to occupancy of the first building, the developer and City shall enter into a shared parking agreement that covers all three Project sites and the four parking zones notes.

ALTERNATIVE MODES OF TRANSPORTATION

Pedestrian and Bicycles

The City is currently working on a Bicycle and Pedestrian Master Plan, but it has not yet been adopted. At this time, bicycle lanes are not proposed on either Harbor Street or Jillson Street.

Sidewalks and curb ramps are present on Harbor and Jillson Streets. The Project will complete and/or maintain the sidewalks adjacent to the Project site for use by pedestrians. Therefore, the Project will have a **less than significant impact** on on-site roadway and site access improvements.

Public Transit Services

The City of Commerce is served by Los Angeles Metro, which provides bus service throughout Los Angeles County. In addition, The Transportation Department provides safe, reliable, convenient, and cost-effective transit services, with a skilled team of employees who are dedicated to meeting the needs of the community.

TEMPORARY TRAFFIC IMPACTS FROM CONSTRUCTION

Although the three properties are relatively flat, the Project will export approximately 235 cubic yards of dirt in approximately 17 truckloads for Site 1B – Jillson 1 (5625 Jillson Street) and 355 cubic yards of dirt in approximately 25 truckloads for Site 2 – Transportation Center (5555 Jillson Street). Site 1A – Harbor (5550 Harbor Street) will balance the dirt on site. The Project will follow the requirements of the City's Municipal Code.

To ensure that construction trips will not significantly impact the area mitigation measure, **MM TRAF-2** is proposed. Implementing **MM TRAF-2** will ensure that construction trips will be **less than significant with mitigation** and will not significantly impact the roadway system.

MM TRAF-2: Prior to any lane closure or detour, the developer shall submit a Construction Traffic Management Plan per the California M.U.T.C.D., for review and approval by the City Engineer. The plan shall include, but not be limited to, signing, truck routes per the City of Commerce Approved Truck Route Map, and construction hours per Section 19.19.160 – Noise of the Municipal Code.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

CITY CAPITAL IMPROVEMENT PROGRAM (CIP)

There are no CIP projects proposed for Jillson or Harbor Street. Adherence to all Engineering requirements for the adjacent streets will ensure that there is **no impact** to the City's CIP, directly, indirectly, and cumulatively.

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY CMP

The Los Angeles County Metropolitan Transportation Authority Congestion Management Program (CMP) designates certain roadways as CMP facilities. Harbor and Jillson Streets are not covered by the CMP.

Consistent with state statute, all local jurisdictions within Los Angeles County, including the County of Los Angeles, adopted and are currently implementing the Land Use Analysis Program. Generally, jurisdictions adopted resolutions or ordinances that are based on the model Land Use Analysis Program resolution contained in Appendix D of the CMP. Future modifications to the jurisdiction's adopted Land Use Analysis Program must be submitted to MTA prior to local adoption. These documents will be kept on file as evidence of local CMP implementation.

Techniques that jurisdictions have found useful in implementing and coordinating Land Use Analysis Program requirements include:

- Incorporating CMP Land Use Analysis Program requirements and related information into project/permit applications and guidance packages provided to project applicants.
- Incorporating a CMP reference into Initial Study checklists.
- Adding CMP related requirements and information into standard Requests for Proposals and contracts for EIR consultants.
- Adding MTA and other area transit operators to standard mailing lists used for CEQA related notices.

Since this Project does not include any CMP designated roadways or there would be **no impact** under the CMP's guidelines, directly, indirectly, or cumulatively.

SUMMARY

Therefore, the Project as designed, conditioned, and mitigated will have a **less than significant impact with mitigation**, directly, indirectly, and cumulatively on any program plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?[1]	☐	☒	☐	☐

Response:

See Response XVII a) above as the City has not yet implemented analysis using vehicle miles traveled (VMT). See footnote 1.

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

Response:

A sight distance analysis for the proposed Project driveways has been prepared based on "corner sight distance" requirements determined by Index 405.1 of the Caltrans Highway Design Manual (HDM), latest

[1] CEQA Guidelines section 15064.3(c) provides that a lead agency "may elect to be governed by the provisions" of the section immediately; otherwise, the section's provisions apply July 1, 2020. Here, the City has not elected to be governed by Section 15064.3. Accordingly, an analysis of vehicles miles traveled (VMT) is not necessary to determine whether a proposed project will have a significant transportation impact.

edition. As a conservative approach, minimum corner sight distance requirements for rural driveways were used for this analysis. For rural driveways, the minimum corner sight distance should be equal to the stopping sight distance shown in the table below. The minimum stopping sight distances are based on the design speed, as displayed in Table 201.1 of the HDM.

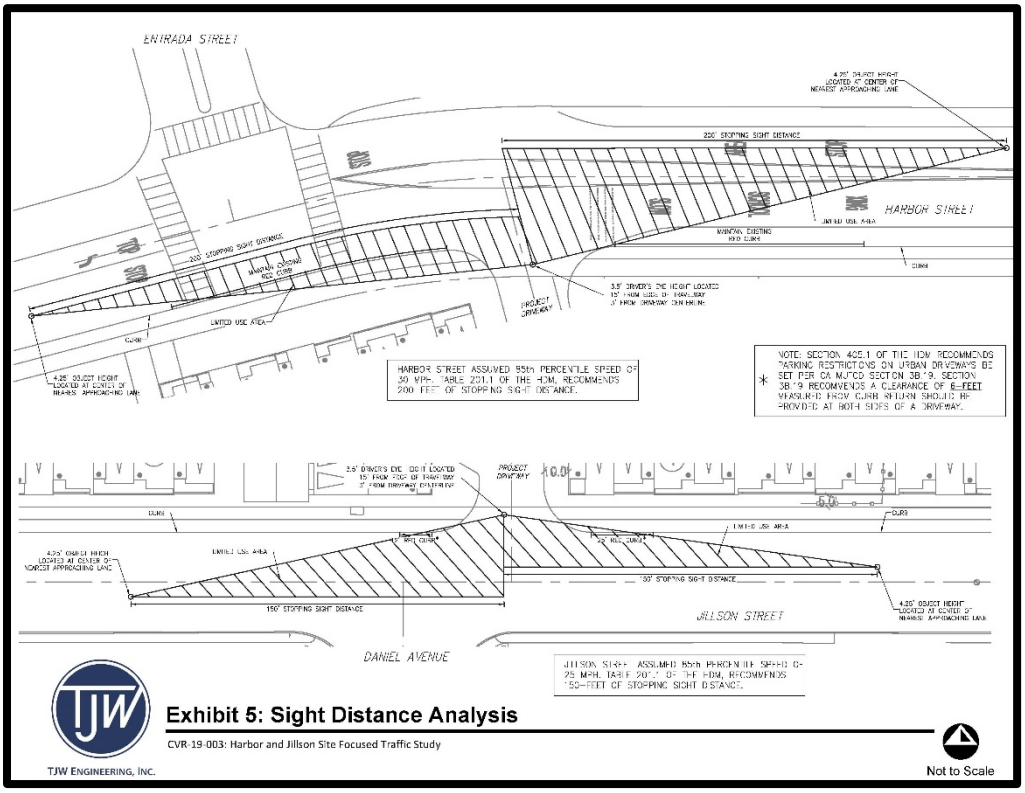
Stopping Sight Distance

Design Speed (mph)	Stopping Sight Distance (ft)
25	**150**
30	**200**
35	250
40	300
45	360
50	430

Source: Table 201.1, Highway Design Manual (July 2, 2018) Note: mph = miles per hour; ft = feet

In this analysis, the movements being analyzed at the Project driveway intersections are movements from exiting vehicles onto Harbor Street and Jillson Street. Posted speed limits on Harbor Street and Jillson Street are 30 miles per hour and 25 miles per hour, respectively.

The exhibit below displays the sight distance conditions at the Project driveway in relation to the existing sidewalk, striping, and parking on Harbor Street and Jillson Street. The exhibit shows the required 15-foot setback from the edge of the travel way, accounting for curbside parking. A stopping sight distance of 200-feet is required at the Harbor Street driveway and a stopping sight distance of 150-feet at the Jillson Street.



As shown in the exhibit, the stopping sight distance requirements would be impaired by street parking along Harbor Street and Jillson Street. To meet sight distance standards along Harbor Street, existing red curb east and west of the proposed driveway should remain. In the case of the proposed driveway at Jillson Street, approximately 37 feet of red-curb should be painted along Jillson Street.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

However, as noted in Index 405.1 of the Highway Design Manual, for urban driveways corner sight distance requirements as described previously, do not apply. Parking should be prohibited per California Manual on Uniform Traffic Control Devices (CA MUTCD) Section 3B.19. Section 3B.19 recommends a clearance of 6-feet measured from the curb return should be provided at both sides of a driveway. It is recommended that, at a minimum, CA MUTCD guidance be followed.

Project Access

Site access points should be constructed per City standards or as directed by the City Engineer. Project access for the Site 1A – Harbor (5550 Harbor Street) is planned via one full access driveway along Harbor Street. The driveway will not be gated and will provide pedestrian access via sidewalks located next to the driveway that will connect directly to Harbor Street.

Project access for the Site 1B – Jillson 1 (5625 Jillson Street) and Site 2 – Transportation Center (5555 Jillson Street) site is planned via one full access driveway along Jillson Street. The driveway will not be gated and will provide pedestrian access via sidewalks located next to the driveway that will connect directly to Jillson Street.

Therefore, with the implementation of mitigation measure, **MM TRAF-3,** the Project will have a **less than significant impact with mitigation** on sight distance and access.

MM TRAF-3: Approximately 376 feet of red-curb shall be painted along Jillson Street as the access point to the Project, and Section 3B.19 of the Section 405.1 of the Highway Design Manual standards shall be applied.

d) Result in inadequate emergency access?	☐	☐	☐	☒

Response:

The Project is providing adequate access on-site for emergency vehicles (i.e., police and ambulance services), and the placement of the buildings has been configured for fire access in case of an emergency. The Project has been reviewed by the City Engineer and the City Fire Department and, as designed, will have **no impact** on emergency access.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Los Angeles County Public Works Traffic Impact Analysis Report Guidelines (January 1, 1997)
5. Los Angeles County Metropolitan Transportation Authority Congestion Management Program (CMP)
6. FY 2018-2019 CIP List
7. FY 9-19/5-Year CIP Program
8. Harbor and Jillson Site Focused Traffic Study – prepared by TJW Engineering, Inc., January 15, 2020

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

a) 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	☐	☒	☐	☐

Response:

A Phase 1 Cultural Resources Assessment was prepared for all three sites, including the following processes: 1) a Cultural Resource Literature and Records Search; 2) Native American Communication; 3)

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

a Cultural Resource Survey; and 4) a Significance Evaluation. The Project area is covered with structures and hardscape, including existing parking lots and sidewalks. The built-environment survey confirmed that no native soils were visible in the Project area, and no prehistoric or historic-period archaeological resources were encountered. However, Applied EarthWorks fieldwork did identify and document two built-environment resources within the Project area over fifty years of age. An evaluation of the significance of these buildings found that neither of the two resources Site 1A – Harbor (5550 Harbor Street) Site 1B – Jillson 1 (5625 Jillson Street) meet the criteria for listing on the California Register of Historical Resources (CRHR).

Therefore, no further management of these two built-environment resources is recommended at this time, and the impact on historical resources is **less than significant**, directly, indirectly, and cumulatively.

No archaeological resources were identified within the Project area; two soils series were identified in the Project area that are highly stratified and have the potential to contain undisturbed archaeological deposits. Although the exact depths of the prior disturbance are unknown, previous construction likely disturbed at least the upper three-feet of sediment in specific areas of the Project area and possibly up to fifteen-feet where underground tanks were installed. It is unlikely that archaeological deposits remained intact as a result of the various episodes' of previous disturbance; however, construction activity below three-feet (in areas that were not previously disturbed to fifteen-feet for water and fuel tanks) has the potential to encounter intact archaeological deposits during Project construction.

As well, as part of the Phase 1 Study, Applied EarthWorks sent out Project Scoping Letters via e-mail to five Native American Tribes as recommended by the Native American Heritage Commission. Only one Tribe responded requesting contact information for the lead CEQA agency, which was provided.

Therefore, the Project will have a **less than significant impact with mitigation** on the significance of historical or archeological resources.

MM CR-1: During all demolition, grading, and ground-disturbing activities, a qualified archaeological monitor shall be present. If potentially significant archaeological materials are encountered during any future construction activities, all work must be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance and integrity of the find. If intact and significant archaeological remains are encountered, the impacts of the Project must be mitigated appropriately. Any such discoveries, and subsequent evaluation and treatment, should be documented in a cultural resource report, which should be submitted to the South Central Coastal Information Center (SCCIC) for archival purposes.

MM CR-2: If the Project area is expanded to include areas not covered by this survey or other recent cultural resource studies, additional cultural resource studies may be required.

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

Response:

In addition to the above, notification of AB 52 consultation on the Project commenced on April 29, 2020, with the two tribes that have requested consultation with the City, the Gabrieleño Band of Mission Indians – Kizh Nation and the Soboba Band of Luiseño Indians. Due to the COVID-19 pandemic, Governor Newsom enacted Executive Order N-54-20 on April 22, 2020, suspending tribal consultation timelines from 30-days to 60-days until June 22, 2020. Therefore, the tribal consultation timeline for this Project

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

ends on June 22, 2020, unless the Governor extends the order. At this time, neither tribe has requested consultation on this Project.

With the implementation of **MM CR-**1 and **MM CR-2,** the Project will have a **less than significant impact with mitigation** on the significance of archeological resources and resources considered significant to a California Native American Tribe.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Los Angeles County General Plan 2008
5. Figure 6.8 - Historical and Cultural Resource Sites
6. National Register of Historic Places Geographic Information System, accessed September 13, 2019
7. California Office of Historic Preservation Website, accessed September 13, 2019
8. Phase 1 Cultural Resource Assessment for the Rosewood Village Residential Project – prepared by Applied Earthworks, Inc., June 2020

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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Response:

Water

See also responses Section X above and XIX b) below for additional information.

Cal Water will provide water to the three Project sites and has provided "will serve" letters for all three sites on January 12, 2020. Cal Water has operated the City of Commerce's water system since 1985. They receive their water supplies from two sources: the Metropolitan Water District and underground wells. None of the existing water lines or other water infrastructure will be removed or relocated. The Project will connect to Cal Water lines, as noted below.

Site 1A – Harbor (5550 Harbor Street)

An existing domestic water line exists in Harbor Street, an eight-inch line that increases in size to a 12-inch line. The Project proposes to install four-inch water lines in the drive aisles between the buildings on-site, connecting to a proposed eight-inch water line in the main driveway of the site. The proposed eight-inch line will connect to the existing 12-inch water line in Jillson Street at a point of connection located on the west side of the driveway. No new lines are proposed within Harbor Street.

Site 1B – Jillson 1 (5625 Jillson Street)

An eight-inch domestic water line exists in Jillson Street. The Project proposes to install four-inch water lines in the drive aisles between the buildings on-site, connecting to a six-inch water line in the main driveway of the site. The six-inch line will connect to the existing eight-inch water line in Jillson Street at a point of connection located to the east of the Project driveway. No new lines are proposed within Jillson Street.

Site 2 – Transportation Center (5555 Jillson Street)

An eight-inch domestic water line exists in Jillson Street. The Project proposes to install four-inch water lines in the drive aisles between the buildings on-site, connecting to a six-inch water line in the main

driveway of the site. The six-inch line will connect to the existing eight-inch water line in Jillson Street at a point of connection located to the east of Building 11. No new lines are proposed within Jillson Street.

Cal Water can serve water to the City in compliance with the City's General Plan, and this Project is consistent with the General Plan. The addition of the proposed Project will not significantly impact Cal Water's capacity, and impacts associated with water will be **less than significant**, directly, indirectly, and cumulatively.

Wastewater Treatment

See also response Section X above and XIX c) below for additional information.

The Project will be served by the Los Angeles County Sanitation District (LACSD) sewer infrastructure. On December 2, 2019, the LACSD provided "will serve" letters for the Site 1A – Harbor and Site 1B – Jillson 1 sites. On December 4, 2019, they provided a "will serve" letter for the Site 2 – Transportation Center site. The "will serve" letters indicate that the LACSD has adequate capacity and infrastructure to serve the Project sites.

Site 1A – Harbor (5550 Harbor Street)

An existing eight-inch sewer line is located in Harbor Street. The Project proposes to install eight-inch sewer lines on-site connecting to a proposed eight-inch sewer line in the main driveway of the site. A new eight-inch sewer line will be installed in Harbor Street connecting to the existing eight-inch sewer line at the manhole located to the westerly end of the Project site in Harbor Street.

Site 1B – Jillson 1 (5625 Jillson Street)

An existing eight-inch sewer line is located in Jillson Street. The Project proposes to install eight-inch sewer lines on-site connecting to the existing eight-inch sewer line at the manhole located in Jillson Street at the end of the Project driveway.

Site 2 – Transportation Center (5555 Jillson Street)

An existing eight-inch sewer line is located in Jillson Street. The Project proposes to install eight-inch sewer lines on-site connecting to the existing eight-inch sewer line at the manhole located in Jillson Street just easterly of Building 11. Building 5 will connect to a sewer stub provided by Site 1B – Jillson 1 (5625 Jillson Street) at the northerly end of the site.

LACSD can process the wastewater planned under the City's General Plan, and this Project is consistent with the General Plan. The addition of the proposed Project will not significantly impact LACSD's capacity, and impacts associated with wastewater treatment will be **less than significant**, directly, indirectly, and cumulatively.

Stormwater Drainage

See also response Section X above for additional information.

The Project will not generate any excessive runoff to the stormwater system other than from the runoff from building roofs, parking areas, and other impervious surfaces. The City's master-planned drainage facilities are designed to accommodate this additional flow. In addition, the Project will not contribute any significant incremental increases in the quantity of pesticides, fertilizers, and detergents into the storm drain system.

The Project will comply with the requirements of Chapter 6.17 -- Stormwater and Runoff Pollution Control of the Municipal Code. As such a Preliminary Low Impact Development (LID) Plan has been prepared consistent with the Los Angeles County Department of Public Works LID Manual and the intent of the NPDES stormwater requirements (State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002,

dated July 1, 2010) and Los Angeles County Municipal Stormwater/NPDES Permit Order R4-2012-0175. In addition, the applicant will be required to prepare a Stormwater Pollution Preventions Program (SQPPP) pursuant to the General Construction Activity NPDES regulations.

The Project design and compliance with existing federal, state, and local water quality laws and regulations related to water quality and waste discharge standards will ensure a **less than significant impact,** directly, indirectly, and cumulatively to water quality and discharge.

Electric Power

Electric power is provided to the site by Southern California Edison (SCE). The Project will utilize a 200 amp service for each home connected to existing 12kV 120/240 distribution lines in Harbor Street and Jillson Street (depending on the site). SCE has committed to providing service to the planned uses of the General Plan, and this Project is consistent with the City's General Plan. The Project will not require the construction of new or expanded electric power. However, Site 1A – Harbor (5550 Harbor Street) does have two existing utility poles adjacent to the site that may be protected in place, relocated, or undergrounded depending on further study. Any changes to these poles will be to the City's and SCE's specifications to continue existing service. Therefore, the Project will have a **less than significant** effect on electric power expansion.

Natural Gas

The Project will not utilize natural gas. Southern California Gas Company has natural gas lines in Jillson Street (four-inch) and in Harbor Street (three-inch). The Project will have a minor relocation of the existing gas line for Site 1A – Harbor (5550 Harbor Street) to keep the Aquatic Center up and operational after the construction of this site. Site 1B – Jillson 1 (5625 Jillson Street) and Site 2 – Transportation Center (5555 Jillson Street) will not require any relocation of gas facilities. Therefore, the Project will have a **less than significant** effect on natural gas facility expansion.

Telecommunications Facilities

Both Charter and AT&T have existing lines overhead on both Harbor & Jillson Streets. As well, the City has an existing radio tower on Site 1A – Harbor (5550 Harbor Street) that will be removed as it is no longer in use. The data vault beneath the tower will be relocated to the parkway in Harbor Street, adjacent to the Aquatic Center. The Charter line on Site 1A – Harbor (5550 Harbor Street) will have a minor relocation order to continue service to the Aquatic Center. Site 1B – Jillson 1 (5625 Jillson Street) and Site 2 – Transportation Center (5555 Jillson Street) will not require relocation of the AT&T or Charter lines. These lines are to be protected in place. Therefore, the Project will have a **less than significant** effect on telecommunication facility expansion.

Summary

As noted Section X and XIX b) above of this document, the Project will be **less than significant** directly, indirectly, or cumulatively, on the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

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

Response:

See response X a) above.

Cal Water will provide water to the three Project sites and has provided "will serve" letters for all three sites on January 12, 2020. Cal Water has operated the City of Commerce's water system since 1985. They receive their water supplies from two sources: the Metropolitan Water District and underground wells. A total of twelve wells pump water from the underlying Los Angeles Basin. Well depths throughout the City range from 270 to 659-feet, but most wells extend about 300-feet below the ground surface.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
As the Project is consistent with the General Plan Vision 2010 upon which Cal Water has made its assumptions for planned water availability and with compliance with all State and local regulations, impacts to water supplies will be **less than significant**, directly, indirectly, and cumulatively.				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
Response: See also response Section X and XIX a) above for additional information. The Project will be served by the Los Angeles County Sanitation District (LACSD) sewer infrastructure. On December 2, 2019, the LACSD provided "will serve" letters for the Site 1A – Harbor and Site 1B – Jillson 1 sites. On December 4, 2019, they provided a "will serve" letter for the Site 2 – Transportation Center site. The "will serve" letters indicate that the LACSD has adequate capacity and infrastructure to serve the Project sites. Impacts would be **less than significant**, directly, indirectly, or cumulatively.				
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?	☐	☐	☒	☐
Response: LACSD operates a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. The LACSD has selected the Mesquite Regional Landfill in Imperial County as the new target destination for the County's waste (as an alternative to the closed Puente Hills landfill). The Mesquite Regional Landfill in Imperial County has a 100-year capacity at 8,000 tons per day. Residential refuse collection services are contracted by the City of Commerce with CalMet Services Inc. There is no charge to residents of the City for residential trash collection service. The City's Environmental Services Division is responsible for implementing the City's Source Reduction and Recycling Element and Household Hazardous Waste Element. Before a demolition permit or grading permit can be issued, the City requires the developer to provide a Construction and Debris Waste Management Plan and Program. At least 65% of the total construction and demolition debris generated by the Project are required to be recycled or reused. During the demolition, grading, and building time frames, the developer must report to the City monthly on completion of the Waste Management Plan's objectives and goals. In addition, the City provides a Residential Curbside Recycling Program, which is the most effective method to recover recyclables from the waste stream such as aluminum, plastic, glass, paper, and green waste. Compliance with source reduction and recycling programs of the City will further reduce the potential adverse impacts on landfill capacity. With the implementation of the City's and CalMet's recycling programs, the City continues to divert waste from the landfill. Therefore, landfill capacity is available to accommodate this Project, and the Project will have a **less than significant impact**, directly, indirectly, and cumulatively to landfills.				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒
Response: Also, see Response d) above. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to assure adequate landfill capacity through mandatory reductions in solid waste quantities (for example, through recycling and composting of green waste) and the safe and efficient transportation of solid waste. The Project will comply with all regulatory requirements regarding solid waste, including AB 939 and AB 341. AB 939, which is administered by the California Department of				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Resources Recycling and Recovery, required local governments to achieve a landfill diversion rate of at least 50 percent by January 1, 2000, through source reduction, recycling, and composting activities. Moreover, AB 341 increases the minimum solid waste diversion rate to 75 percent by 2020. Such regulations will apply to this Project, and compliance is mandatory. Further, mandates set forth by the CALGreen Code aim to reduce solid waste generation and promote recycling and diversion design and activities, to which this Project is required to comply. There will be **no impacts,** directly, indirectly or cumulatively regarding compliance with Federal, State, and local statutes and regulations related to solid waste.

Sources:

1. City of Commerce 2020 General Plan, adopted January 2008
2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008
3. Title 19 – Zoning of the Commerce Municipal Code
4. Chapter 6.17 -- Stormwater and Runoff Pollution Control
5. Chapter 13.04 – Sewers
6. Los Angeles County Department of Public Works LID Manual
7. State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002 dated July 1, 2010
8. Los Angeles County Municipal Stormwater/NPDES Permit Order R4-2012-0175
9. Preliminary Geotechnical Investigation 5550 Harbor Street, 5625 Jillson Street and 5555 Jillson Street, Commerce 1A, 1B and 2 – prepared by Alta California Geotechnical Inc., October 21, 2019
10. Preliminary Hydrology Study TTM 82890 5550 Harbor Street – prepared by C&V Consulting, Inc., November 2019
11. Preliminary Hydrology Study TTM 82891 5625 Jillson Street – prepared by C&V Consulting, Inc., December 2019
12. Preliminary Hydrology Study TTM 82892 5555 Jillson Street – prepared by C&V Consulting, Inc., December 2019
13. Preliminary Low Impact Development (LID) Plan 5550 Harbor Street – prepared by C&V Consulting, Inc., December 2019
14. Preliminary Low Impact Development (LID) Plan 5625 Jillson Street – prepared by C&V Consulting, Inc., December 2019
15. Preliminary Low Impact Development (LID) Plan 5555 Jillson Street – prepared by C&V Consulting, Inc., December 2019

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?	☐	☒	☐	☐

Response:

Los Angeles County adopted the All-Hazards Mitigation Plan (AHMP), providing a framework for emergency response. As well, the City maintains an Emergency Operations Plan (EOP) that documents City policies for responding to major emergencies that threaten life, safety, and property. The plan establishes a chain of command and outlines the responsibilities of various City departments in the event of an emergency.

The City's General Plan Exhibit 7-1—Safety Plan shows the location of the City's Emergency Evacuation Routes. Neither Jillson Street nor Harbor Street are planned evacuation routes.

Site 1A – Harbor (5550 Harbor Street) will take access from an existing driveway off Harbor Street. Site 1B – Jillson 1 (5625 Jillson Street) will take access from a single driveway off Jillson Street, which will serve both this site and the Site 2 – Transportation Center (5555 Jillson Street) site. The Project will not alter the existing circulation pattern in the Project area. Emergency access and evacuation routes will be unaffected by the Project.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Construction activities may temporarily restrict vehicular traffic. However, even temporary changes to the existing roadway network require the approval of the City and notification to all emergency responders per **MM TRAF-2**. The Project provides adequate access for emergency vehicles, including adequate street widths and vertical clearance. Implementation of federal, state, and local laws and regulations in the construction of this Project would result in **less than significant impacts with mitigation,** directly, indirectly, or cumulatively, to adopted emergency response or evacuation plans.				
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?	☐	☐	☐	☒
Response: In addition to response Sections VII and IX above, the Project sites are not located within a Very High Fire Hazard Classification area. As well, the sites are relatively flat and surrounded by residential, public-use facility, and manufacturing uses. Therefore, the Project will not exacerbate wildfire risks and will have **no impact**, directly, indirectly, or cumulatively, to the exposure of pollutant concentration from a wildfire or the uncontrolled spread of a wildfire.				
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 on the environment?	☐	☐	☐	☒
Response: The Project will not require the installation or maintenance of the associated infrastructure that would exacerbate fire risk, or that may result in temporary or ongoing impacts on the environment and, as such, will have **no impact**, directly, indirectly, or cumulatively.				
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?	☐	☐	☐	☒
Response: See Sections VII and IX above. The Project sites are not located within a Very High Fire Hazard Classification area. The sites are situated on relatively level ground and are not immediately adjacent to any slopes or hillsides that could be potentially susceptible to slope instability. No signs of slope instability in the form of landslides, rockfalls, earth flows, or slumps were observed at or near the subject site during Sladden's investigation. The Project sites are not located within a 100-year mapped flood zone (FEMA Flood Insurance Rate Map No. 06037C1815F (September 26, 2008). The Project would redirect on-site drainage patterns; however, it would not impede or redirect flood flows. As referenced, all drainage would be managed to ensure pre-construction flows off-site are maintained. The Project would not expose people or structures to flood hazards from severe storm events. Therefore, the Project will have **no impact**, directly, indirectly, or cumulatively, as it is not expected to have a wildland fire on site and, therefore, will not expose people or structures to significant risk, from flooding, or landslides as a result of a post-wildfire.				
Sources: 1. City of Commerce 2020 General Plan, adopted January 2008 ➢ Exhibit 7-1 – Safety Plan 2. City of Commerce General Plan Update Final Environmental Impact Report, adopted January 2008 3. Title 19 – Zoning of the Commerce Municipal Code				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4. Section 19.19.120 – Hazardous Material and Waste 5. Los Angeles County Airport Land Use Commission website and GIS mapping – accessed March 20, 2020 6. Los Angeles County Local All-Hazards Mitigation Plan – adopted 2014 ➢ Figure 7-1 – Los Angeles County Very High Fire Hazard Severity Zones 7. Toxics Release Inventory (TRI) Program – https://www.epa.gov/toxics-release-inventory-tri-program/learn-about-toxics-release-inventory				
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?	☐	☒	☐	☐
Response: As noted in Section IV (Biological Resources), the Project will have **no impact** on Biological Resources. However, as noted in Sections V (Cultural Resources) and XVIII (Tribal Cultural Resources), the Project will have a **less than significant impact with mitigation** on archeological resources. Since the Project sites are currently developed and are surrounded by urban development, the sites do not provide biological habitat. However, excavation could unearth archeological resources that may be important examples of significant periods of California history or pre-history.				
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 project, and the effects of probable future projects.)?	☐	☐	☒	☐
Response: The Project will contribute to the cumulative impacts of development in the City of Commerce and the broader area. However, the Project is in conformance with the City's General Plan, and therefore, it will have a **less than significant** impact cumulatively.				
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
Response: Effects on human beings were evaluated as part of the Air Quality, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use/Planning, Population and Housing, Recreation, and Utilities sections of this Initial Study and were found to be **less than significant** for each of the above sections. As well, effects on human beings were evaluated as part of the Aesthetics, Hazards, and Hazardous Materials, Noise, Public Services, Transportation, and Wildfire sections of this Initial Study and were found to be **less than significant with mitigation**. Based on the analysis and conclusions in this Initial Study, the Project will not cause substantial adverse effects, directly or indirectly, to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
are **less than significant with mitigation measures MM AES-1, MM AES-2, MM NOI-1** through **MM NOI-6, MM PS-1, MM PS-2,** and **MM TRAF-1** and **MM TRAF-3.**				

ATTACHMENT B
FINDINGS - CALIFORNIA SUBDIVISION MAP ACT
FOR TENTATIVE TRACT MAP

The California Subdivision Map Act requires that the Planning Commission make the following findings before approving the subdivision:

1. Government Code Section 66453.5

    a. That the proposed subdivision, together with the provisions for its design and improvement, is consistent with the general plan required by Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of the Government Code, or any specific plan adopted pursuant to Article 8 (commencing with Section 65450) of Chapter 3 of Division 1 of the Government Code. *Tentative Tract Map 82890, Tentative Tract Map 82891, and Tentative Tract Map 82892 are consistent with all elements of the City's General Plan. The General Plan Land Use designation on the subject site is Housing Opportunity Overlay (HOO). The corresponding Zoning Designation for the sites is Housing Opportunity Overlay zone in conjunction with an underlying Heavy Industrial (M-2) zone, as stated in the Commerce Municipal Code Chapter 19.47.020.*

2. Government Code Section 66474

    a. **That the site is physically suitable for the proposed density of development.** *The subject sites are physically suitable to accommodate the density proposed by the applicant. The project sites located in the City of Commerce are approximately 1.98 acres, 1.33 acres, and 2.43 acres.*

    b. **The subdivision or proposed improvements will not cause substantial environmental damage or substantially and avoidably injure fish wildlife or their habitat.** *The design of the proposed project will not cause substantial environmental damage or substantially and avoidably injure fish, wildlife, or their habitat. The Project sites are developed with buildings and parking areas and are located in an urbanized setting. As such, the site does not support habitat for any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. No natural, undeveloped open space areas are located within proximity of the Project sites. In addition, the Project sites are not located in a habitat conservation plan or designated by the County of Los Angeles as a Significant Ecological Areas (SEAs). As a result, no impacts to*

habitat conservation plans or natural community conservation plans will occur with the development of the Project sites.

c. **That the subdivision or type of improvement will not cause serious public health problems.** *The design of the subdivision or type of improvements will not likely cause serious public health problems because the project involves new development of 133 residential units, which there are existing residential within the immediate vicinity of the subject sites. The proposed project will not jeopardize, adversely affect, endanger, or otherwise constitute a menace to the public health, safety, and welfare of the project. The proposed project conforms to all development standards specified in the Commerce Municipal Code.*

d. **That the proposed subdivision and improvements will not conflict with easements for access through or the use of the property within the proposed subdivision.** *The design of the subdivision or type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision. There will be improvements of the public street to serve the subject site. Furthermore, the City notified utility companies that service the area. Responses received from these agencies did not indicate any location of easements on the proposed site.*

3. Government Code Section 66474.6

a. **That the discharge of waste from the proposed subdivision into the existing community sewer system will not violate existing requirements of the water code.** *The design of the subdivision or type of improvements will not violate any existing requirements of the water code. The discharge of waste from the sites will have to be approved by the Sanitation District who will ensure that no existing requirements of the water code are violated.*

MITIGATION MONITORING & REPORTING PROGRAM (MMRP) FOR THE ROSEWOOD VILLAGE RESIDENTIAL PROJECT

1. **Project Case Number(s):** Development Agreement
Tentative Tract Map 82890
Tentative Tract Map 82891
Tentative Tract Map 82892
Change of Zone
Demolition of Existing Buildings

2. **Project Title:** Rosewood Village Residential Project (the "Project")

3. **Lead Agency:** City of Commerce
Sonia Griego, Economic Development & Planning
2535 Commerce Way
Commerce, CA 90040
(323) 722-4805 Ext. 2346
soniag@ci.commerce.ca.us

4. **Project Sponsor**:

Applicant/Developer	**Property Owner**
Kim Prijatel Senior Vice President of Development City Ventures 3121 Michelson Drive, Suite 150 Irvine, CA 92612 (949) 258-7540 kPrijatel@cityventures.com	City Ventures 3121 Michelson Drive, Suite 150 Irvine, CA 92612 (949) 258-7555

5. **Project Location:**

The Project consists of three parcels (or sites) located at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street. The sites are generally bounded by Harbor Street to the North, Commerce Way to the East, Jillson Street to the South, and East Eastern Avenue to the West, in the City of Commerce, County of Los Angeles, California. The site is located in an un-sectioned portion

Township 3 South, Range 13 West, as shown on the Los Angeles, California 7.5-minute U.S. Geological Survey (USGS) topographic quadrangle map. It is comprised of Tax Assessor parcel numbers 6335-025-902, 903, 905, and 906.

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
AESTHETICS						
MM AES-1	Prior to building permit issuance, the developer shall submit a photometric plan to meet the following requirements. The plan shall be submitted to the City for approval and shall be designed in compliance with Section 19.19.130 of the City's Zoning Ordinance and shall include the following: ➢ Outdoor lighting shall maintain a minimum of **one**-foot candle illumination for all parking and pedestrian areas. The plan must include details such as beam spreads and/or photometric calculations, location, and type of fixtures, and arrangement of exterior lighting that does not create glare or hazardous interference to adjacent streets or properties.	Developer	Prior to Building Permit Issuance	Planning shall ensure that plan is reviewed and approved		
REMARKS:						
MM AES-2	Prior to building permit issuance, the developer shall ensure that the design of the buildings shall reduce the number of reflective surfaces used in the construction to minimize new sources of glare. Exterior building materials shall use earth tone colors with a low-reflectance. Any bare	Developer	Prior to Building Permit Issuance	Planning shall ensure that plan is reviewed and approved		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
	metallic surfaces found on infrastructures such as pipes and poles shall be painted to minimize reflectance and glare					
REMARKS:						
CULTURAL RESOURCES						
MM CR-1	During all demolition, grading, and ground-disturbing activities, a qualified archaeological monitor shall be present. If potentially significant archaeological materials are encountered during any future construction activities, all work must be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance and integrity of the find. If intact and significant archaeological remains are encountered, the impacts of the Project must be mitigated appropriately. Any such discoveries, and subsequent evaluation and treatment, should be documented in a cultural resource report, which should be submitted to the South Central Coastal Information Center (SCCIC) for archival purposes.	Developer	During Demolition, Grading and Ground-Disturbing Activities	Planning, Building, and Engineering shall ensure that the monitor is present when required		
REMARKS:						
MM CR-2	If the Project area is expanded to include areas not covered by this survey or other recent cultural resource studies, additional cultural	Developer	If Project is Expanded Beyond current Project	Planning, Building, and Engineering shall ensure that		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
	resource studies may be required,		Boundaries	the Project Does Not Expand Current Project Boundaries		
REMARKS:						
GEOLOGY & SOILS						
MM PALEO-1	Prior to demolition, grading, or ground-disturbing activities, a paleontological resource impact mitigation program (PRIMP) shall be prepared in accordance with industry-wide best practices (Murphey et al., 2019) and SVP (2010) guidelines. A qualified professional paleontologist (Project Paleontologist, Principal Investigator) shall prepare the PRIMP prior to issuance of City demolition and grading permits for the Project. The PRIMP will specify the steps to be taken to mitigate impacts to paleontological resources. For instance, Worker's Environmental Awareness Program (WEAP) training should be presented in-person to all field personnel prior to the start of Project-related earth-moving activities to describe the types of fossils that may be found and the procedures to follow if any are encountered. A PRIMP also will specify whether construction monitoring is required and, if so, the frequency of required monitoring (i.e., full-time, spot-checks,	Developer	Prior To Demolition, Grading, or Ground-Disturbing Activities	Planning Shall Keep a Copy of PRIMP		

Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	etc.). A PRIMP also provides details about fossil collection, analysis, and preparation for permanent curation at an approved repository. Lastly, the PRIMP describes the different reporting standards to be used—monitoring with negative findings versus monitoring resulting in fossil discoveries.					
REMARKS:						
HAZARDS & HAZARDOUS MATERIALS						
MM HAZ-1	Prior to renovation, refurbishing, or demolition activities of any structures or parking areas all Asbestos Containing Materials (ACM) and Asbestos Containing Construction Materials (ACCM) shall be removed by a licensed abatement contractor in accordance with all applicable laws, including guidelines of the Occupational Safety and Health Administration ("OSHA"). If the entire area of asbestos-containing material is not affected by the renovation, refurbishing, or demolition activities, spot abatement of the material could be completed, provided it complies with applicable laws and regulations. These requirements entail only abating the affected areas. If the identified ACM is going to be managed in-place, then written notification to employees, tenants,	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		

Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	contractors, or purchasers of the Property in regard to the presence and location of ACMs and ACCMs is required pursuant to the California Health and Safety Code 25915. Historically, certain concealed materials may be present within wall cavities (e.g., electrical wire wrapping, insulation materials, vapor barrier paper, gypsum board, joint compound, etc.) that contain asbestos, and some underground utility piping has been known to contain asbestos (e.g., Transite pipe). If demolition of the Property includes removal of on-site portions of underground utilities (storm drains, sewer, domestic water laterals, etc.), evaluation of the asbestos content of these components must be performed prior to the removal process. Suspect materials identified in these locations are assumed positive for asbestos until sampling and analysis indicate otherwise. If, during the course of a renovation/demolition project, suspect ACMs are discovered that are not included within any Pre-Demolition Asbestos and Lead-Based Paint Survey, those materials are to be assumed positive for asbestos unless additional sampling, analysis and/or					

Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	assessment indicates otherwise.					
REMARKS:						
MM HAZ-2	Prior to renovation, refurbishing, or demolition activities, any lead-containing paint shall be stabilized. The paint stabilization work should be performed by a State of California, Licensed Contractor, who maintains the California Department of Public Health (CDPH) trained and certified lead workers. Additionally, the work shall be performed in accordance with the Occupational Safety and Health Administration (OSHA) requirements OSHA 29 CFR 1926.62 (Lead – Safety and Health Regulations for Construction) and the Division of Occupational Safety and Health (DOSH) requirements DOSH 8 CCR Section 1532.1 (Lead in Construction Standard).	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		
REMARKS:						
MM HAZ-3	Prior to and in conjunction with the demolition permit issuance, City Ventures will complete the investigation, remediation, and/or evaluation of all releases on the site in accordance with the Standard Voluntary Agreement with the DTSC and approved Scope of Work.	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		
REMARKS:						
MM HAZ-4	Prior to and in conjunction with the	Developer	Prior to	Building Shall		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
	demolition permit issuance, City Ventures will implement CLRRA for assessment and remediation of the site in accordance with the California Land Reuse and Revitalization Act Program Agreement with the DTSC and approved Scope of Work		Renovation, Refurbishing, or Demolition Activities	Not Issue Demo Permit Without Proof of Required Work		
REMARKS:						
NOISE						
MM NOI-1	The Project will require a minimum of windows with an STC rating of 28 or higher to meet the City's 45 dBA CNEL requirement.	Developer	Prior to Building Permit Issuance	Planning shall verify on Plan Check set of plans		
REMARKS:						
MM NOI-2	Construction shall occur during the hours of 7:00 AM to 7:00 PM.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well any noise complaints shall be processed.		
REMARKS:						
MM NOI-3	Stationary construction noise sources such as generators or pumps should be located as far as feasibly possible from any existing adjacent residential or sensitive units, as feasible.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well any noise complaints shall be processed.		
REMARKS:						

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
MM NOI-4	Construction staging areas should be located as far as feasibly possible from any adjacent sensitive land uses, as feasible.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well any noise complaints shall be processed.		
REMARKS:						
MM NOI-5	During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices and mufflers, which reduce the operational noise 15 dB.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well any noise complaints shall be processed.		
REMARKS:						
MM NOI-6	Equipment shall be maintained so that vehicles and their loads are secured from rattling and banging.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well any noise complaints shall be processed.		
REMARKS:						
PUBLIC SERVICES						
MM PS-1	Prior to building permit issuance, the final site plan, elevations, building floor plans, and site circulation shall be reviewed by the Los Angeles County Sheriff's Department to ensure	Developer	Prior to Building Permit Issuance	Los Angeles County Sheriff's Department Shall Review and Approve the		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
	it conforms to their operational requirements.			Final Plans		
MM PS-2	Prior to occupancy, the developer will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.	Developer	Prior to Occupancy	Los Angeles County Sheriff's Department Shall Approve the Security Plan		
TRANSPORTATION						
MM TRAF-1	Prior to occupancy of the first building, the developer and City shall enter into a shared parking agreement that covers all three Project sites and the four parking zones notes.	Developer	Prior to First Building Permit	Planning Shall Review and Approve the Shared Parking Agreement		
REMARKS:						
MM TRAF-2	Prior to any lane closure or detour, the developer shall submit a Construction Traffic Management Plan per the California M.U.T.C.D., for review and approval by the City Engineer. The plan shall include, but not be limited to, signing, truck routes per the City of Commerce Approved Truck Route Map, and construction hours per Section 19.19.160 – Noise of the Municipal Code.	Developer	Prior to Lane Closures or Detours	Engineering and Planning will review and approve the Haul Route Plan		
REMARKS:						
MM TRAF-3	Prior to Occupancy of Site 1B – Jillson 1 (5625 Jillson Street) and Site 2 – Transportation Center (5555 Jillson Street) approximately 376 feet of red-	Developer	Prior to Occupancy	Engineering Shall Ensure the Curb is Painted Before an		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		**Responsible Party**	**Monitoring Timing or Frequency**	**Type of Verification**	**Verification of Compliance**	
					Initials	**Date**
	curb shall be painted along Jillson Street as the access point to the Project, and Section 3B.19 of the Section 405.1 of the Highway Design Manual standards shall be applied.			Occupancy Permit is Released		
REMARKS:						
TRIBAL CULTURAL RESOURCES						
SEE MM CR-1 AND MM CR-2						
REMARKS:						
WILDFIRE						
See MM TRAF-2						
REMARKS:						

ATTACHMENT C
CONDITIONS OF APPROVAL FOR PLOT PLAN NO. 995

1. A Site Plan Review approval that is valid and in effect and granted pursuant to the provisions of Title 19 of the Commerce Municipal Code shall be valid only on the property for which it was granted and only for the improvements for which it is granted and further, shall continue to be valid upon change of ownership of the property or any lawfully existing building or structure on the property.

2. All conditions shall be binding upon the applicants, their successors and assigns; shall run with the land; shall limit and control the issuance and validity of certificates of occupancy; and shall restrict and limit the construction, location, and use and maintenance of all land and structures within the development.

3. This permit and all rights hereunder shall terminate within twelve months of the effective date of the permit unless operations are commenced or a written time extension is granted, based on a written request submitted prior to the expiration of the one-year period as provided in Section 19.39.720 of the Commerce Municipal Code.

4. The abandonment or non-use of this approval for a period of one year shall terminate the approval without further action of the Planning Commission or City Council, and any privileges granted thereunder shall become null and void.

5. In the event of transfer of ownership of the property involved in this application, the new owner shall be fully informed of the use and development of said property as set forth by this permit together with all conditions, which are a part thereof.

6. All parking areas shall be clearly identified. The surface parking area must be striped to clearly indicate the location and extent of vehicle parking, maneuvering areas, and drive aisles.

7. All loading must occur on-site. All vehicle maneuvering shall occur on-site as well.

8. During construction, all roadways shall be kept open to traffic.

9. Equipment used for construction activities shall be properly tuned to reduce exhaust emissions.

10. Construction activities shall be stopped during first and second stage smog alerts.

11. During construction, trucks and equipment that are not in use shall shut off their engines instead of idling.

12. Construction equipment shall be kept in proper tune and mufflers shall be used on all construction equipment to reduce equipment noise.

13. Roads adjacent to the project site shall be swept as needed to reduce fugitive dust from the proposed project site.

14. All grading operations will be suspended when wind speeds (as instantaneous gusts) exceed 35 miles per hour.

15. Construction activities shall be permitted between the hours of 7:00 a.m. to 7:00 p.m. Once operational, the proposed project must conform to the City's Noise Ordinance.

16. Storage of building materials related to construction activities shall be contained within the project site.

17. The project site shall be cleared of all debris prior to the issuance of a building department final inspection.

18. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants.

19. Contractors and subcontractors engaged in the construction activities of the project shall obtain a business license and all required permits from the City of Commerce.

20. The contractor under the observation of the soil engineer shall conduct all clearing, site preparation, or earthwork performed on the project.

21. The soils engineer shall provide inspection for site clearing and grading in order to certify that the grading was done in accordance with approved plans and grading specifications.

22. Soils binders shall be utilized on construction sites for unpaved roads and/or parking areas.

23. The project will be required to comply with all programs adopted by the City for the reduction of solid waste.

24. Where feasible, the applicant shall use recycled materials during construction and recycle construction waste. A report shall be provided to the City of Commerce.

25. Ultra-low flow water fixtures must be installed to reduce the volume of sewage to the system.

26. The project applicant shall install energy-efficient electrical appliances and equipment in accordance with the State of California's Energy Efficiency Standards (Title 24).

27. Prior to the issuance of any occupancy permits, three (3) sets of landscaping and irrigation plans shall be prepared by a landscape architect and submitted to the City for review and approval. All designated landscaping areas shall be fully planted prior to the issuance of building permit final inspection and maintained at all times.

28. Site development shall conform to the site plan reviewed by the Planning Commission when approval of the subject project was granted.

29. Violation of any of the conditions of this approval shall be cause for revocation and termination of all rights thereunder.

30. The Economic Development and Planning Director or her designee shall have the authority to initiate proceedings to suspend or revoke a Site Plan Review approval pursuant to provisions set forth in Sections 19.39.240 through 19.39.250, inclusive, of the Commerce Municipal Code, Chapter 19.39.

31. The applicant and the contractors involved in demolition and/or construction activities must comply with all pertinent South Coast Air Quality Management District (SCAQMD) regulations and requirements governing Particulate Matter (PM10) generation (Rule 401, 403, etc.). PM10 pollution consists of very small liquid and solid particles floating in the air. These particles are less than 10 microns in diameter – about $1/7^{th}$ the thickness of the human – and are known as PM10.

32. The applicant shall work with staff on the final design, layout, and treatment of the proposed warehouse building, and landscape plan to insure compliance with all provisions of the Commerce Municipal Code. The final design of the structure shall be subject to the review and approval of the City's Economic Development Subcommittee and Director of Economic Development and Planning or her designee.

33. The project shall comply with the Section 19.19.220 of the CMC (General Development Standards and Design Guidelines) as well as all other applicable sections of the CMC.

34. The applicant and future tenants will be required to obtain all pertinent operating permits from the SCAQMD for any equipment requiring such permits.

35. The proposed project shall conform to Fire, Building, and Public Works Code requirements. Notwithstanding this review, all required permits from the County Department of Building and Safety must be secured.

36. The Applicant or General Contractor shall keep the construction area sufficiently damped to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.

37. All materials transported off-site shall either be sufficiently watered or securely covered to prevent excessive amounts of dust and spillage.

38. The Applicant shall ensure that the contractors adhere to all pertinent SCAQMD protocols regarding grading, site preparation, and construction activities.

39. The Applicant shall ensure that the grading and building contractors must adhere to all pertinent provisions of Rule 403 pertaining to the generation of fugitive dust during grading and/or the use of equipment on unpaved surfaces. The contractors will be responsible for being familiar with, and implementing any pertinent best available control measures.

40. During construction, disposal of refuse and other materials should occur in a specified and controlled temporary area on-site physically separated from potential storm water runoff, with ultimate disposal in accordance with local, State and Federal requirements.

41. Sediment from areas disturbed by construction shall be retained on-site using structural controls to the maximum extent practicable.

42. The project shall comply with the City's Low Impact Development Standards and Green Street Policy.

43. All required permits by all permitting agencies shall be obtained for operation of said use and any construction associated with the subject request.

44. The CC &R (Covenants, Conditions & Restriction) shall state that all new owners of the homes shall be limited to two vehicles and shall be parked within their designated garage.

45. The applicant shall work with the City to study, and if appropriate, dedicate a portion of the project to affordable housing. To the maximum extent feasible, the number of units and affordability range shall be determined at a later time.

46. The Applicant is required to install artwork or pay an in-lieu fee subject to the City's Art in Public Places Ordinance. The cost of the artwork or in-lieu fee shall be equal to 1% of the projects valuation.

47. Violation of any of the conditions of the approval shall be cause for revocation and termination of all rights thereunder.

48. The Director of Economic Development and Planning or her designee is authorized to make minor modifications to the approved preliminary plans or any of the conditions if such modifications shall achieve substantially the same results as would strict compliance with said plans and conditions.

49. The Applicant shall sign, notarize, and return to the Economic Development and Planning Department an affidavit accepting all Conditions of Approval within 10 days from the date of the approval, unless appealed. The Applicant acknowledges and understands that all conditions set forth in this Resolution are conditions precedent to the grant of approval and failure to comply with any condition contained herein shall render this Condition Use Permit non-binding as against the City and shall confer Applicant no legal rights under the law.

50. The applicant shall defend, indemnify, and hold harmless the City, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding brought against the city, its elected and appointed officials, agents, officers, or employees arising out of, or which are related to the applicant's project or application (collectively referred to as "proceedings"). The indemnification shall include, but not be limited to, damages, fees and/or costs, liabilities, and expenses incurred or awarded in connection with the proceedings whether incurred by the applicant, the city, and/or the parties initiating or bringing such proceedings. This indemnity provision shall include the applicant's obligation to indemnify the city for all the city's costs, fees, and damages that the city incurs in enforcing the indemnification provisions set forth herein. The city shall have the right to choose its own legal counsel to represent the city's interest in the proceedings.

DEPARTMENT OF BUILDING DIVISION CONDITIONS:

The following work items are to be designed, installed, and completed at the sole expense of the applicant/developer/property owner.

GENERAL REQUIREMENT FEES

1. Prior to issuance of grading, building or other permits as appropriate, the applicant shall pay all necessary and nominal fees to the City.

2. Sewer fee will be required in addition to the fees paid to the Sanitation Districts of Los Angeles County, and shall be paid prior to building permit issuance.

3. Water service connection fees will be required and paid to California Water Service (Cal Water).

4. Separate public encroachment permit and Public Works inspection fees payment are required for all work in the public rights-of-way in the City.

BUILDING DIVISION CONDITIONS AND CODE REQUIREMENTS

The following conditions or code requirements of the Building Division shall be provided:

1. The second sheet of building plans is to list all City of Commerce conditions of approval and to include a copy of the Planning Commission Decision letter. This information shall be incorporated into the plans prior to the first submittal for plan check. Conditions are required from the following departments: Planning, Building, Fire, Public Works and Utility Department.

2. School Developmental Fees shall be paid to the Commerce School District prior to the issuance of the building permit.

3. Fees shall be paid to the County of Los Angeles Sanitation District prior to issuance of the building permit.

4. An application to assign unit numbers shall be filed with Building Division prior to plan check submittal.

5. In accordance with paragraph 5538(b) of the California Business and Professions Code, plans are to be prepared and stamped by a licensed architect.

6. Structural calculations prepared under the direction of an architect, civil engineer or structural engineer shall be provided.

7. When a tract or parcel map is required to be recorded as part of the development, the building permit will not be issued until the property has been surveyed and the boundaries marked by a land surveyor licensed by the State of California.

8. City records indicate the proposed site involves a change of parcel boundary between ownerships. A lot line adjustment by document shall be processed prior to issuance of the building permit.

9. City records indicate the proposed site is a combination of lots under common ownership. A parcel merger by document shall be processed prior to issuance of the building permit.

10. Building permits shall not be issued until the final map has been prepared to the satisfaction of the Building Official.

11. Foundation inspection will not be made until setback on each side of each proposed building along the property line has been surveyed and the location of the footings has been determined to be in accordance with the approved plans by a land surveyor licensed by the State of California. THIS NOTE IS TO BE PLACED ON THE FOUNDATION PLAN IN A PROMINENT LOCATION.

12. A geotechnical and soils investigation report is required, the duties of the soils engineer of record, as indicated on the first sheet of the approved plans, shall include the following:

    a) Observation of cleared areas and benches prepared to receive fill;
    b) Observation of the removal of all unsuitable soils and other materials;
    c) The approval of soils to be used as fill material;
    d) Inspection of compaction and placement of fill;
    e) The testing of compacted fills; and
    f) The inspection of review of drainage devices.

13. The owner shall retain the soils engineer preparing the Preliminary Soils and/or Geotechnical Investigation accepted by the City for observation of all grading, site preparation, and compaction testing. Observation and testing shall not be performed by another soils and/or geotechnical engineer unless the subsequent soils and/or geotechnical engineer submits and has accepted by the Public Works Department, a new Preliminary Soils and/or Geotechnical Investigation.

14. Prior to permit issuance the pdf copy of the soils report shall be provided by the applicant

15. A grading and drainage plan shall be approved prior to issuance of the building permit. The grading and drainage plan shall indicate how all storm drainage including contributory drainage from adjacent lots is carried to the public way or drainage structure approved to receive storm water.

16. Grading security shall be posted with the City Building Division prior to issuance of the grading permit whenever the cut or fill yardage exceeds 1,000 cubic yards.

17. A Stormwater Pollution Prevention Program ("SWPPP") is required to be submitted. The SWPPP shall contain details of best management practices, including desilting basins or other temporary drainage or control measures, or both, as may be necessary to control construction-related pollutants which originate from the site as a result of construction related activities. No grading permit will be issued until the SWPPP has been submitted to and accepted by the building official.

18. For sites where the disturbed area is one acre or more, applicants must file a Notice of Intent (NOI) and a State SWPPP and obtain a Waste Discharge Identification number (WDID No.). Both the NOI and the WDID No. must be stated on the first sheet of the plans.

19. A (re)development project, where a proposed building in a separate parcel alone meets the definition of "Planning Priority Projects", is required to comply with the requirements in the Low Impact Development (LID) Standards. A maintenance covenant of the required LID features for each parcel shall be prepared and recorded at County Recorder's office.

20. A Multi-Phased Project, where multiple buildings are located within one parcel and to be developed over more than one phase, is subject to the requirements of the Low Impact Development (LID) Standards. If the stormwater mitigation system is designed such that LID standards and requirements are satisfied for multiple buildings, a maintenance covenant of the required LID features for all buildings in the subject parcel shall be prepared by the owner(s) and recorded at County Recorder's office.

21. When, as determined by the City, 100 percent onsite retention of the SWQDv is technically infeasible, partially or fully, the infeasibility shall be demonstrated in the submitted LID Plan. The technical infeasibility may result from conditions that may include, but are not limited to:

    a. The infiltration rate of saturated in-situ soils is less than 0.3 inch per hour and it is not technically feasible to amend the in-situ soils to attain an infiltration rate necessary to achieve reliable performance of infiltration or bio retention BMPs in retaining the SWQDv onsite.
    b. Locations where seasonal high groundwater is within five to ten feet of surface grade;

c. Locations within 100 feet of a groundwater well used for drinking water;
d. Brownfield development sites or other locations where pollutant mobilization is a documented concern;
e. Locations with potential geotechnical hazards;
f. Smart growth and infill or redevelopment locations where the density and/or nature of the project would create significant difficulty for compliance with the onsite volume retention requirement.

22. If partial or complete onsite retention is technically infeasible, the project Site may bio filtrate 1.5 times the portion of the remaining SWQDv that is not reliably retained onsite. Bio filtration BMPs must adhere to the design specifications provided in the Municipal NPDES Permit.

g. Additional alternative compliance options such as offsite infiltration may be available to the project site. The project site should contact the City to determine eligibility. Alternative compliance options are further specified in County of Los Angeles LID Standards Manual 2009 or as may later be amended.

23. The remaining SWQDv that cannot be retained or bio-filtered onsite must be treated onsite to reduce pollutant loading. BMPs must be selected and designed to meet pollutant-specific benchmarks as required per the Municipal NPDES Permit. Flow-through BMPs may be used to treat the remaining SWQDv and must be sized based on a rainfall intensity of:

h. 0.2 inches per hour, or

i. The one year, one-hour rainfall intensity as determined from the most recent Los Angeles County isohyetal map, whichever is greater.

24. City of Commerce Storm Water Program Planning Priority Project Checklist completed by Engineer of Record and approved by Environmental Division shall be copied on the first sheet of Building Plans and on the first sheet of Grading Plans.

25. Electrical plan check is required.

26. Mechanical plan check is required.

27. Plumbing plan check is required.

28. No form work or other construction materials will be permitted to encroach into adjacent property without written approval of the affected property owner.

29. South Coast Air Quality Management District must be contacted prior to any demolition or renovation. Call (909) 396-2000 for further information. Failure to comply with the provisions of Rule 1403 may result in a penalty of up to $25,000 per day.

30. Demolition permit is required for any existing buildings, which are to be demolished.

31. The governing codes shall be determined individually for each building at the time of plan check submittal and shall apply throughout the duration of each phase until completion.

32. Separate plans, applications, and fees are required for each building or development phase prior to plan review of electrical, plumbing, mechanical, or grading plans.

33. Rules and regulations for expiring plan check and permit applications for each building shall be enforced separately by the governing codes as determined at the time of plan check submittal.

34. Prior to the issuance of building permit, a written consent shall be obtained from the current easement holder(s) for any proposed development encroaching into existing easement(s).

35. All fire sprinkler hangers must be designed, and their location approved by an engineer or an architect. Calculations must be provided indicating that the hangers are designed to carry the tributary weight of the water filled pipe plus a 250-pound point load. A plan indication this information must be stamped by the engineer or the architect and submitted for approval prior to issuance of the building permit.

36. Separate permit is required for Fire Sprinklers

37. Townhouse building construction shall comply with the governing Los Angeles County Residential Code.

38. Construction, projections, openings and penetrations of exterior walls of each townhouse building, a cluster consists of 2 or more dwelling units, equipped throughout with an automatic sprinkler system installed in accordance with Section R313 shall comply with Table R302.1(2).

39. Each townhouse shall be considered a separate building and shall be separated by fire-resistance rated wall assemblies meeting the requirements of Section R302.1 for exterior walls per Section R302.2.

40. The garage shall be separated from each dwelling unit as required by Table R302.6. Openings in garage walls shall comply with Section R302.5.

41. All State of California disability access regulations for accessibility and adaptability shall be complied with.

42. Dwelling units in a building consisting of three or more dwelling units or four or more condominium units shall meet the requirements of the California Building Code Chapter 11A. Covered Multifamily Dwellings include but are not limited to dwelling units listed in Section 1.8.2.1.2. Dwelling units within a single structure separated by firewalls do not constitute separate buildings.

43. At least 10 percent but not less than one of the multistory condominium dwellings in buildings, which contain Covered Multifamily Dwellings, with no elevator shall comply with the requirements listed in Section 1102A.3.1.

44. Private garages accessory to covered multifamily dwelling units, shall be accessible per Section 1109A.2.1.

45. When parking is provided for covered multifamily dwellings and is not assigned to a resident or a group of residents at least 5 percent of the parking spaces shall be accessible and provide access to grade-level entrances of covered multifamily dwellings and facilities (e.g., swimming pools, club houses, recreation areas, and laundry rooms) that serve covered multifamily dwellings per Section 1109A.5.

46. Each dwelling unit shall comply with the CalGreen Residential mandatory requirements.

47. Single-family residences located in subdivisions with ten or more single-family residences and where the application for a tentative subdivision map for the residences has been deemed complete by the City of Commerce shall comply with the solar ready buildings requirements per Section 110.10 (a) of the California Energy Code.

48. Separate drainage easement(s) shall be provided for any subject parcel whose finish surfaces are graded to drain through adjacent parcel(s) or whose underground drainage structures are connected to similar devices located at adjacent parcel(s) for the purpose of achieving Multi-Phased Project LID design. Drainage easements shall be for the full width of the property.

49. Fire-resistance rating requirements for exterior walls and maximum area of exterior wall openings and degree of open protection based on fire separation distance 0 feet to 3 feet, dwellings and accessory buildings with automatic residential fire sprinkler protection shall comply with Table R302.1(2).

PUBLIC WORKS CONDITIONS / REQUIREMENTS

Separate plans for improvements within the public right-of-way are required. The following are required for the off-site improvements:

1. Applicant shall construct sidewalk/curb bulb-outs on Jillson within the frontage

of their development per City's direction. This was discussed as a potential off-site improvements measure with the developer's staff at the beginning of the project.

2. Since details of the Bike Master Plan for Harbor are not known at this time, the proposed curb bulb out on Harbor are no longer required. However, instead of the curb bulb out in front of the proposed development, an in lieu fee will be collected by the City . The applicant shall provide the City with an engineer's cost estimate including 25% for contingencies (design inspection, material testing, etc.) for our review. The proposed bulb out and/or any required improvements in the area will be implemented after completion and adoption of the Bike Master Plan, Traffic study, etc. in the future.

3. The applicant shall work in good faith with the City to address all utilities, which may include but not be limited to relocation and undergrounding.

4. Applicant shall pay in-lieu fee for the street rehabilitation of half of the street width within the frontage of their property along Jillson and Harbor. The in lieu fees shall be calculated during plan review.

5. Applicant shall provide ADA compliant sidewalk and ramps as necessary along the sidewalks adjacent to the development within the frontage of their property along Jillson and Harbor.

6. Applicant shall provide ADA compliant sidewalk and ramps as necessary along the sidewalks adjacent to the development within the frontage of their property along Jillson and Harbor.

7. Applicant shall repair all damaged, broken, non-compliant, non-standard, curb, gutter, sidewalk and ramps as necessary along the sidewalks adjacent to the development within the frontage of their property along Jillson and Harbor.

8. Applicant shall be required to execute and record a Landscape and Maintenance Agreement for Landscape and Irrigation proposed to be installed in the five foot (5'-0") public right-of-way adjacent to the subject development to be used a landscape puffer for the residential development. The applicant must complete this process prior to the issuance of a grading permit. The developer shall accept the maintenance in the public right- of-way in perpetuity, at their own expense.

9. Sewer Study shall be reviewed and approved by the City Engineer or his/her designee, prior to the issuance of permits. If sewer is found to be inadequate, sewer improvement plans shall be submitted to the City for approval and required improvements shall be made at the sole cost to the property owner/developer.

10. Project shall be reviewed and approved by the City Traffic Engineer, prior to the issuance of permits. Any mitigation measures shown on the traffic study if any shall be made at the sole cost to the property owner/developer.

The following are general requirements for off-site improvements:

A. Any existing improvements in the public right of way that is damaged, made off-grade during construction, including but not limited to the following: traffic signals, light standards, aprons, sidewalk, curb ramps, curb, and/or gutter, shall be removed and replaced with the appropriated SPPWC Standard or as directed by the Public Works & Development Services Department.

B. All site drainage shall be collected and deposited in the adjacent gutter, alley, storm drain or similar structure or device, and if necessary, filtered per NPDES regulations. Site storm and/or nuisance water shall not flow across the city sidewalk.

C. All new and existing, non-complying driveway aprons shall be constructed in accordance with SPPWC standards and shall provide a minimum 4 feet wide path of travel at no more than 2% cross-slope at the top of apron. Where limited parkway width occurs, the sidewalk shall be depressed at the back of apron to provide a disable access complying path of travel across the driveway apron. Top of driveway apron X shall be 5 feet minimum from any trees, power poles, traffic signal controllers, electric services, or similar improvements in the public right-of-way.

D. All existing driveways aprons to be closed shall be removed and replaced with new curb, gutter, and sidewalk constructed in accordance with SPPWC standards.

E. All damaged or off-grade curb, gutter, and sidewalk shall be removed and replaced in accordance with SPPWC standards.

F. All necessary permits, including encroachment permits, utility connection permits, etc., shall be first secured from the City of Commerce, and any other responsible or underlying agency, before any work can commence within the public right of way.

G. All work in the public right-of-way shall be done in accordance with established City standards or as directed by the Director of Public Works and/or the City Engineer.

TENTATIVE TRACT MAP REQUIREMENTS

Following information is provided for applicant's convenience. Project shall comply with all applicable requirements for Tract Maps.

1. A final tract map prepared by or under the direction of a registered civil engineer or licensed land surveyor shall be submitted to and approved by the City prior to being filed with the Los Angeles County Recorder.

2. A soils report is required.

3. A preliminary tract map guarantee shall be provided which indicates all trust deeds (to include the name of the trustee), all easement holders, all fee interest holders, and all interest holders whose interest could result in a fee. The account for this title report shall remain open until the final tract map is filed with the Los Angeles County Recorder.
4. Easements shall not be granted or recorded within any area proposed to be dedicated, offered for dedication, or granted for use as a public street, alley, highway, right of access, building restriction, or other easements until after the final tract map is approved by the City and filed with the Los Angeles County Recorder; unless such easement is subordinated to the proposed dedication or grant. If easements are granted after the date of tentative approval, subordination shall be executed by the easement holder prior to the filing of the final tract map.

5. Monumentation of tract map boundaries, street centerlines, and lot boundaries is required if the map is based on a field survey.

6. All conditions from City Departments and Divisions shall be incorporated into the tract map prior to submitting the tract map for review.

7. In accordance with California Government Code Sections 66442 and/or 66450, documentation shall be provided indicating the mathematical accuracy and survey analysis of the tract map and the correctness of all certificates. Proof of ownership and proof of original signatures shall also be provided.

8. Proof of Tax clearance shall be provided at the time of tract map review submittal.

9. Upon submittal of the parcel map for review by the City, a letter signed by both the subdivider and the engineer shall be provided which indicates that these individuals agree to submit one (1) blueprints and one sepia mylar and pdf copy on a CD of the recorded map to the City Public Works Department.

10. A reciprocal easement for ingress and egress, sanitary sewer, utility, drainage, water shall be provided for each property that does not front on orhave direct access to the public way. Services to each property shall be underground and shall be located in a trench within this easement.

11. Existing structures shall be demolished prior the approval of the map.

COUNTY OF LOS ANGELES FIRE DEPARTMENT CODE REQUIREMENTS

1. Additional requirements (may/will) be required pending information provided.

2. The applicant shall be responsible for meeting all Los Angeles County Fire Department requirements and conditions when available for the 133 single-family attached residential units on three parcels to be known as Rosewood Village.

ATTACHMENT D
MITIGATION MONITORING & REPORTING PROGRAM INITIAL STUDY FOR PLOT PLAN NO. 995

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
AESTHETICS						
MM AES-1	Prior to building permit issuance, the developer shall submit a photometric plan to meet the following requirements. The plan shall be submitted to the City for approval and shall be designed in compliance with Section 19.19.130 of the City's Zoning Ordinance and shall include the following: ➢ Outdoor lighting shall maintain a minimum of **one**-foot candle illumination for all parking and pedestrian areas. The plan must include details such as beam spreads and/or photometric calculations, location, and type of fixtures, and arrangement of exterior lighting that does not create glare or hazardous interference to adjacent streets or properties.	Developer	Prior to Building Permit Issuance	Planning shall ensure that plan is reviewed and approved		
REMARKS:						
MM AES-2	Prior to building permit issuance, the developer shall ensure that the design of the buildings shall reduce the number of reflective surfaces used in the construction to minimize new sources of glare. Exterior building materials shall use earth tone colors with a low-reflectance. Any bare	Developer	Prior to Building Permit Issuance	Planning shall ensure that plan is reviewed and approved		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	metallic surfaces found on infrastructures such as pipes and poles shall be painted to minimize reflectance and glare					
REMARKS:						
CULTURAL RESOURCES						
MM CR-1	During all demolition, grading, and ground-disturbing activities, a qualified archaeological monitor shall be present. If potentially significant archaeological materials are encountered during any future construction activities, all work must be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance and integrity of the find. If intact and significant archaeological remains are encountered, the impacts of the Project must be mitigated appropriately. Any such discoveries, and subsequent evaluation and treatment, should be documented in a cultural resource report, which should be submitted to the South Central Coastal Information Center (SCCIC) for archival purposes.	Developer	During Demolition, Grading and Ground-Disturbing Activities	Planning, Building, and Engineering shall ensure that the monitor is present when required		
REMARKS:						
MM CR-2	If the Project area is expanded to include areas not covered by this survey or other recent cultural resource	Developer	If Project is Expanded Beyond current	Planning, Building, and Engineering shall ensure that		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	studies, additional cultural resource studies may be required,		Project Boundaries	the Project Does Not Expand Current Project Boundaries		
REMARKS:						
GEOLOGY & SOILS						
MM PALEO-1	Prior to demolition, grading, or ground-disturbing activities, a paleontological resource impact mitigation program (PRIMP) shall be prepared in accordance with industry-wide best practices (Murphey et al., 2019) and SVP (2010) guidelines. A qualified professional paleontologist (Project Paleontologist, Principal Investigator) shall prepare the PRIMP prior to issuance of City demolition and grading permits for the Project. The PRIMP will specify the steps to be taken to mitigate impacts to paleontological resources. For instance, Worker's Environmental Awareness Program (WEAP) training should be presented in-person to all field personnel prior to the start of Project-related earth-moving activities to describe the types of fossils that may be found and the procedures to follow if any are encountered. A PRIMP also will specify whether construction monitoring is required and, if so, the frequency of required monitoring (i.e.,	Developer	Prior To Demolition, Grading, or Ground-Disturbing Activities	Planning Shall Keep a Copy of PRIMP		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	full-time, spot-checks, etc.). A PRIMP also provides details about fossil collection, analysis, and preparation for permanent curation at an approved repository. Lastly, the PRIMP describes the different reporting standards to be used—monitoring with negative findings versus monitoring resulting in fossil discoveries.					
REMARKS:						
HAZARDS & HAZARDOUS MATERIALS						
MM HAZ-1	Prior to the renovation, refurbishing, or demolition activities of any structures or parking areas all Asbestos Containing Materials (ACM) and Asbestos Containing Construction Materials (ACCM) shall be removed by a licensed abatement contractor in accordance with all applicable laws, including guidelines of the Occupational Safety and Health Administration ("OSHA"). If the entire area of asbestos-containing material is not affected by the renovation, refurbishing, or demolition activities, spot abatement of the material could be completed, provided it complies with applicable laws and regulations. These requirements entail only abating the affected areas. If the identified ACM is going to be managed in-place, then written notification to employees,	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT

Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	tenants, contractors, or purchasers of the Property in regard to the presence and location of ACMs and ACCMs is required pursuant to the California Health and Safety Code 25915. Historically, certain concealed materials may be present within wall cavities (e.g., electrical wire wrapping, insulation materials, vapor barrier paper, gypsum board, joint compound, etc.) that contain asbestos, and some underground utility piping has been known to contain asbestos (e.g., Transite pipe). If demolition of the Property includes removal of on-site portions of underground utilities (storm drains, sewer, domestic water laterals, etc.), evaluation of the asbestos content of these components must be performed prior to the removal process. Suspect materials identified in these locations are assumed positive for asbestos until sampling and analysis indicate otherwise. If, during the course of a renovation/demolition project, suspect ACMs are discovered that are not included within any Pre-Demolition Asbestos and Lead-Based Paint Survey, those materials are to be assumed positive for asbestos unless					

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
	additional sampling, analysis and/or assessment indicates otherwise.					
REMARKS:						
MM HAZ-2	Prior to renovation, refurbishing, or demolition activities, any lead-containing paint shall be stabilized. The paint stabilization work should be performed by a State of California, Licensed Contractor, who maintains the California Department of Public Health (CDPH) trained and certified lead workers. Additionally, the work shall be performed in accordance with the Occupational Safety and Health Administration (OSHA) requirements OSHA 29 CFR 1926.62 (Lead – Safety and Health Regulations for Construction) and the Division of Occupational Safety and Health (DOSH) requirements DOSH 8 CCR Section 1532.1 (Lead in Construction Standard).	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		
REMARKS:						
MM HAZ-3	Prior to and in conjunction with the demolition permit issuance, City Ventures will complete the investigation, remediation, and/or evaluation of all releases on the site in accordance with the Standard Voluntary Agreement with the DTSC and approved Scope of Work.	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
REMARKS:						
MM HAZ-4	Prior to and in conjunction with the demolition permit issuance, City Ventures will implement CLRRA for assessment and remediation of the site in accordance with the California Land Reuse and Revitalization Act Program Agreement with the DTSC and approved Scope of Work	Developer	Prior to Renovation, Refurbishing, or Demolition Activities	Building Shall Not Issue Demo Permit Without Proof of Required Work		
REMARKS:						
NOISE						
MM NOI-1	The Project will require a minimum of windows with an STC rating of 28 or higher to meet the City's 45 dBA CNEL requirement.	Developer	Prior to Building Permit Issuance	Planning shall verify on Plan Check set of plans		
REMARKS:						
MM NOI-2	Construction shall occur during the hours of 7:00 AM to 7:00 PM.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well, any noise complaints shall be processed.		
REMARKS:						
MM NOI-3	Stationary construction noise sources such as generators or pumps should be located as far as feasibly possible from any existing adjacent residential or sensitive units, as feasible.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well, any noise		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
				complaints shall be processed.		
REMARKS:						
MM NOI-4	Construction staging areas should be located as far as feasibly possible from any adjacent sensitive land uses, as feasible.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well, any noise complaints shall be processed.		
REMARKS:						
MM NOI-5	During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices and mufflers, which reduce the operational noise 15 dB.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well, any noise complaints shall be processed.		
REMARKS:						
MM NOI-6	Equipment shall be maintained so that vehicles and their loads are secured from rattling and banging.	Developer	Monitor During All Earthmoving and Construction Activity	City Engineer and Building Inspectors shall monitor during inspections. As well, any noise complaints shall be processed.		
REMARKS:						
PUBLIC SERVICES						

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
MM PS-1	Prior to building permit issuance, the final site plan, elevations, building floor plans, and site circulation shall be reviewed by the Los Angeles County Sheriff's Department to ensure it conforms to their operational requirements.	Developer	Prior to Building Permit Issuance	Los Angeles County Sheriff's Department Shall Review and Approve the Final Plans		
MM PS-2	Prior to occupancy, the developer will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.	Developer	Prior to Occupancy	Los Angeles County Sheriff's Department Shall Approve the Security Plan		
TRANSPORTATION						
MM TRAF-1	Prior to occupancy of the first building, the developer and City shall enter into a shared parking agreement that covers all three Project sites and the four parking zones notes.	Developer	Prior to First Building Permit	Planning Shall Review and Approve the Shared Parking Agreement		
REMARKS:						
MM TRAF-2	Prior to any lane closure or detour, the developer shall submit a Construction Traffic Management Plan per the California MUTCD, for review and approval by the City Engineer. The plan shall include, but not be limited to, signing, truck routes per the City of Commerce Approved Truck Route Map, and construction hours per Section 19.19.160 – Noise of the Municipal Code.	Developer	Prior to Lane Closures or Detours	Engineering and Planning will review and approve the Haul Route Plan		

ROSEWOOD VILLAGE RESIDENTIAL PROJECT						
Mitigation Measures		Responsible Party	Monitoring Timing or Frequency	Type of Verification	Verification of Compliance	
					Initials	Date
REMARKS:						
MM TRAF-3	Prior to Occupancy of Site 1B – Jillson 1 (5625 Jillson Street) and Site 2 – Transportation Center (5555 Jillson Street) approximately 376 feet of red-curb shall be painted along Jillson Street as the access point to the Project, and Section 3B.19 of the Section 405.1 of the Highway Design Manual standards shall be applied.	Developer	Prior to Occupancy	Engineering Shall Ensure the Curb is Painted Before an Occupancy Permit is Released		
REMARKS:						
TRIBAL CULTURAL RESOURCES						
SEE MM CR-1 AND MM CR-2						
REMARKS:						
WILDFIRE						
See MM TRAF-2						
REMARKS:						

Project Summary

Total Site Area: + 1.98 Acres
Net Site Area: ± 1.84 Acres (+ 80,103 SF; adjusted PL eliminating "tail")

Total Units: 37 Homes
- (19) Plan 1: + 1,394 SF, 3 bedroom, 3 bath
- (18) Plan 2: ± 1,670 SF, 3 bedroom, 3 bath, flex

Net Density: 20.1 Homes per Acre

Parking:
Provided: 89 Spaces (2.4 spaces per home)
- Garage: 74 Spaces
- Head In: 15 Spaces (9' x 18')

Open Space:
Provided: 25,994 SF Total(+ 702 SF per home)
- Common: 20,952 SF (10' Min. Dimension)
- Private: 5,042 SF (5' Min. Dimension)
  - Ground: 2,004 SF
  - Deck: 3,083 SF

Lot Coverage: 28,491 SF (35.5% of site)

Notes:

1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per civil engineer.
4. Civil engineer to verify all setbacks and grading information
5. Building Footprints might change due to the final design elevation style.
6. Open space area is subject to change due to the balcony design of the elevation.
7. Building setbacks are measured from property lines to building foundation lines.

City Ventures

CONCEPTUAL SITE PLAN
ROSEWOOD VILLAGE - HARBOR SITE
COMMERCE, CA

0 15 30 60

CITY SUBMITTAL
2018392 | 08-26-20

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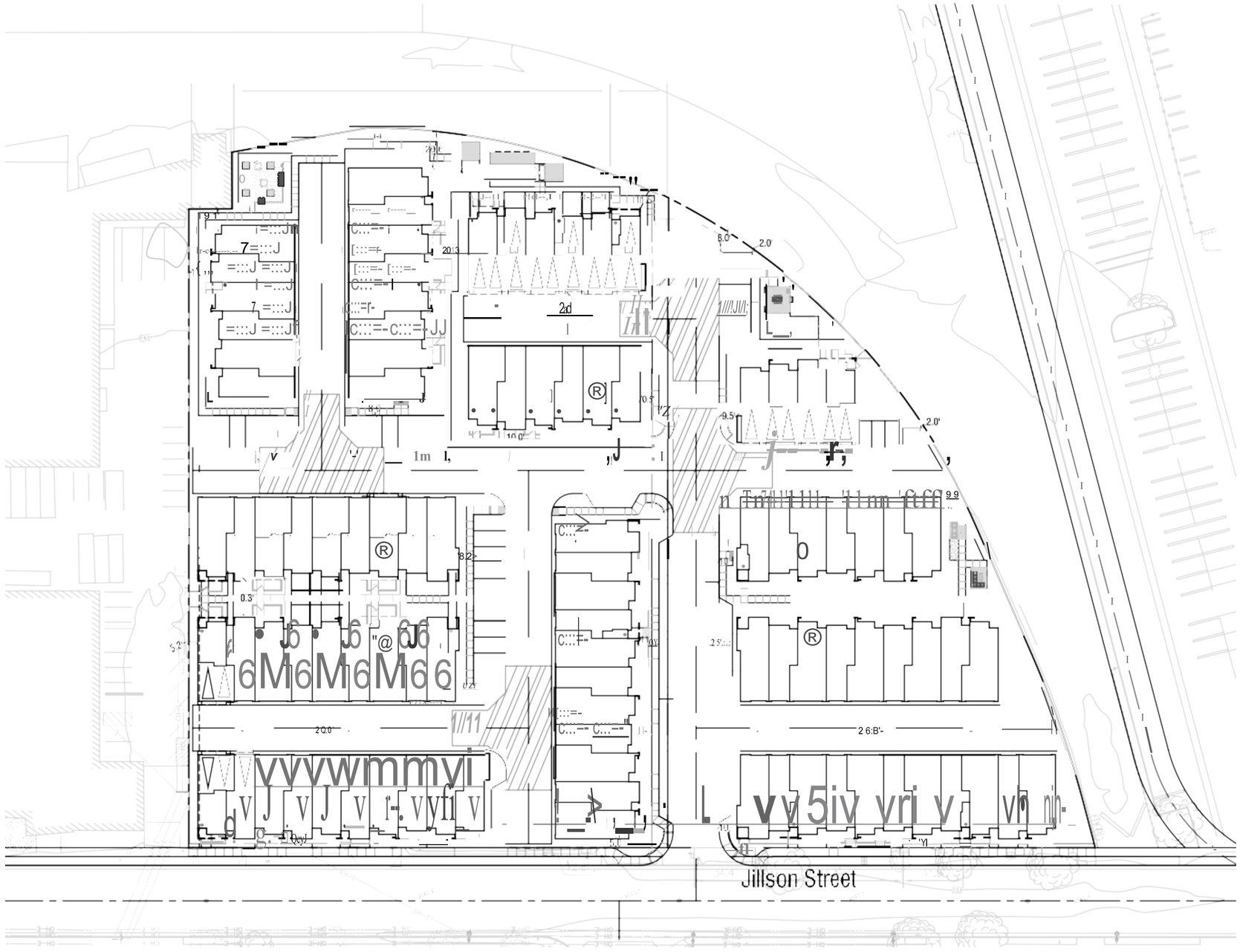
ORANGE COUNTY LOS ANGELES • SYBEAR



Project Summary

Total Site Area: ± 1.33 Acres(:+:_ 57,761 SF)

Total Units: 31 Homes
- (17) Plan 1: + 1,417 SF, 3 bedroom, 3 bath
- (14) Plan 2: + 1,670 SF, 3 bedroom, 3 bath, flex

Density: 23.3 Homes per Acre

Parking:
Provided: 73 Spaces (2.35 spaces per home)
- Garage: 62 Spaces
- Head In: 5 Spaces (9' x 18')
- Compact: 3 Spaces (7.5' x15')
- Parallel Compact: 3 Spaces (7.5' x20')

Open Space:
Provided: 11,115 SF Total (:+:_ 358 SF per home)
- Common: 6,722 SF (10' Min. Dimension)
- Private: 4,393 SF (5' Min. Dimension)
  - Ground: 2,136 SF
  - Deck: 2,257 SF

Lot Coverage: 23,846 SF (41.3% of site)

Notes:

1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per civil engineer.
4. Civil engineer to verify all setbacks and grading information
5. Building Footprints might change due to the final design elevation style.
6. Open space area is subject to change due to the balcony design of the elevation.
7. Building setbacks are measured from property lines to building foundation lines.

City Ventures

CONCEPTUAL SITE PLAN
ROSEWOOD VILLAGE - JILLSON 1 SITE
COMMERCE, CA

0 15 30 60

CITY SUBMITTAL | 2019021 | 08-26-20

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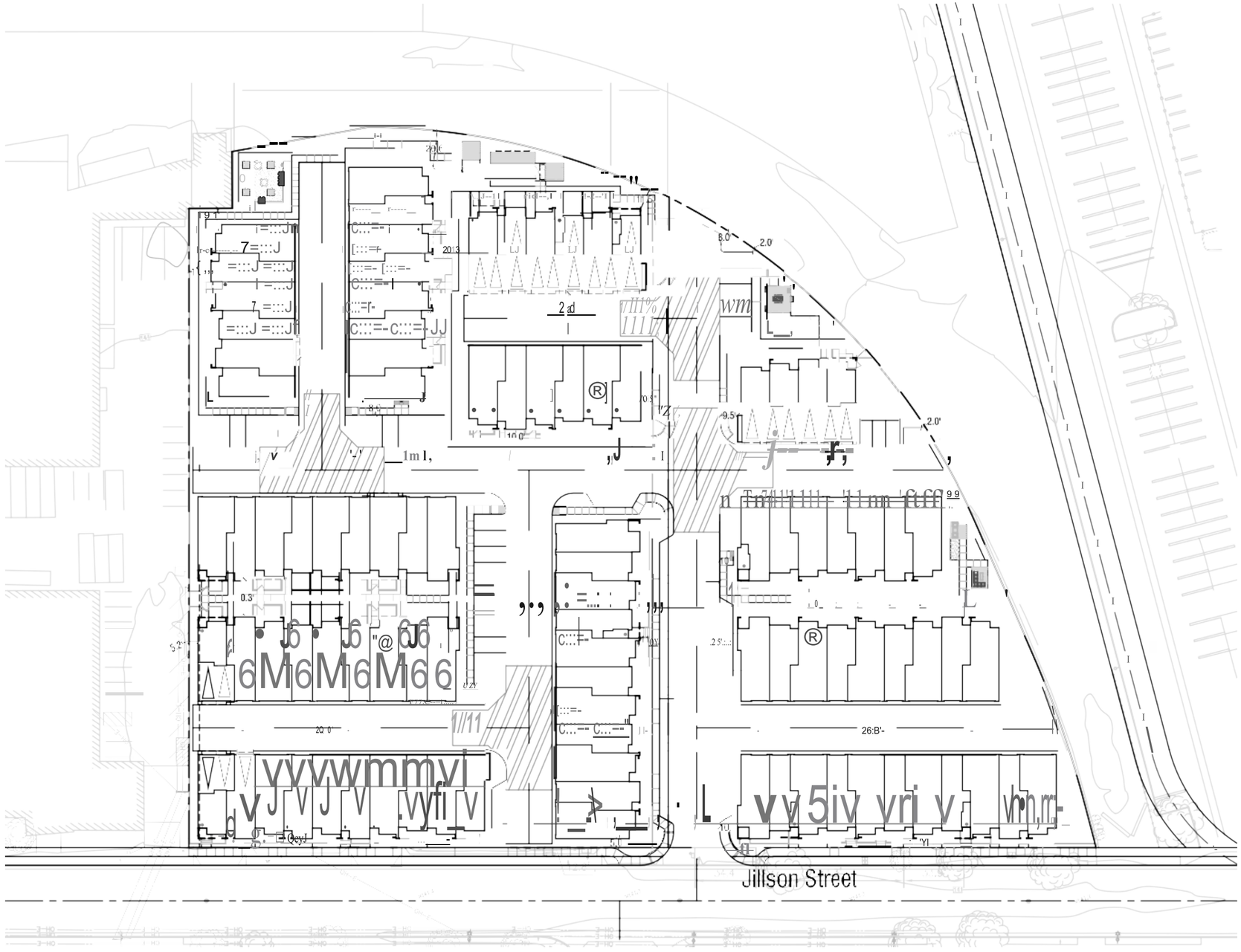

Project Summary

Total Site Area: ± 2.43 Acres(:+:_ 105,851 SF)

Total Units: 65 Homes
- (34) Plan 1: + 1,417 SF, 3 bedroom, 3 bath
- (31) Plan 2: + 1,670 SF, 3 bedroom, 3 bath, flex

Density: 26.75 Homes per Acre

Parking:
Provided: 158 Spaces (2.43 spaces per home)
- Garage: 130 Spaces
- Head In: 18 Spaces (9' x 18')
- Parallel: 10 Spaces (8' x 22')

Open Space:
Provided: 23,832 SF Total(+ 366 SF per home)
- Common: 16,986 SF (1O' Min. Dimension)
- Private: 6,846 SF (5' Min. Dimension)
  - Ground: 2,283 SF
  - Deck: 4,563 SF

Lot Coverage: 49,995 SF (47.2% of site)

Notes:

1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per civil engineer.
4. Civil engineer to verify all setbacks and grading information
5. Building Footprints might change due to the final design elevation style.
6. Open space area is subject to change due to the balcony design of the elevation.
7. Building setbacks are measured from property lines to building foundation lines.

City Ventures

CONCEPTUAL SITE PLAN
ROSEWOOD VILLAGE - JILLSON 2 SITE
COMMERCE, CA

0 15 30 60

CITY SUBMITTAL | 2019021 | 08-26-20

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TJW ENGINEERING, INC.
TRAFFIC ENGINEERING &
TRANSPORTATION PLANNING
CONSULTANTS

January 15, 2020

Ms. Kim Prijatel
CITY VENTURES
3121 Michelson Drive, Suite 150
Irvine, CA 92612

Subject: Harbor and Jillson Site Focused Traffic Study - City of Commerce

Dear Mr. Herman:

TJW ENGINEERING, INC. (TJW) is pleased to present you with this focused traffic study for the proposed projects located at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street in the City of Commerce. The project will be built in phases with an initial opening year in 2020 and completion in 2022. The project consists of three (3) multi-family townhome sites consisting of 145 total dwelling units:

- [Harbor Site] 5550 Harbor Street - 37 dwelling units (2-3 phases)
- [Jillson 1 Site] 5625 Jillson Street - 36 dwelling units (2 phases)
- [Jillson 2 Site] 5555 Jillson Street - 72 dwelling units (3-4 phases)

This focused traffic study has been prepared to address concerns related to on-site and off-site parking, driveway access, and on-site circulation. This report is being submitted to you for review and forwarding to the City of Commerce. Please contact us at (949) 878-3509 if you have any questions regarding this study.

Sincerely,

Thomas Wheat, PE, TE
President
Registered Civil Engineer *#69467*
Registered Traffic Engineer *#2565*

REGISTERED PROFESSIONAL ENGINEER
THOMAS JOSEPH WHEAT
No. 69467
Exp. 6/30/20
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
THOMAS JOSEPH WHEAT
No. 2565
Exp. 6/30/20
TRAFFIC
STATE OF CALIFORNIA

David Chew, PTP
Transportation Planner

Jeffrey Chinchilla, PE
Project Engineer

Harbor and Jillson Site
Focused Traffic Study
City of Commerce, California

Prepared for:

Ms. Kim Prijatel
CITY VENTURES
3121 Michelson Drive, Suite 150
Irvine, CA 92612

Prepared by:

TJW ENGINEERING, INC.
TRAFFIC ENGINEERING &
TRANSPORTATION PLANNING
CONSULTANTS

6 Venture, Suite 225
Irvine, CA 92618

Thomas Wheat, PE, TE
David Chew, PTP
Jeffrey Chinchilla, PE

January 15, 2019
JN: CVR-19-003

1.0 TRIP GENERATION AND DISTRIBUTION

The proposed projects located at 5550 Harbor Street, 5625 Jillson Street, and 5555 Jillson Street in the City of Commerce. The project will be built in phases with an initial opening year in 2020 and completion in 2022. The project consists of three (3) multi-family townhome sites consisting of 145 total dwelling units:

- [Harbor Site] 5550 Harbor Street - 37 dwelling units (2-3 phases)
- [Jillson 1 Site] 5625 Jillson Street - 36 dwelling units (2 phases)
- [Jillson 2 Site] 5555 Jillson Street - 72 dwelling units (3-4 phases)

Exhibit 1A and 1B show the proposed project site plans at the Harbor site and Jillson site respectively. Exhibit 2 shows the location of the project sites.

1.1 PROJECT TRIP GENERATION

Projected trip generation for the proposed project was based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition). Based on the proposed project's intended use the projected trip generation was determined using the Multifamily Housing (Mid-Rise) Land Use Code 221.

Table 1: *Projected Trip Generation*

Proposed Land Use	Qty	Unit	Daily Trips (ADTs)		AM Peak Hour					PM Peak Hour				
			Rate	Volume	Rate	In:Out Split	Volume			Rate	In:Out Split	Volume		
							In	Out	Total			In	Out	Total
Multi-Family Housing (221)	37.0	DU	5.44	201	0.36	26:74	4	10	14	0.44	61:39	10	7	17
Multi-Family Housing (221)	36.0	DU	5.44	196	0.36	26:74	3	10	13	0.44	61:39	10	6	16
Multi-Family Housing (221)	72.0	DU	5.44	392	0.36	26:74	7	19	26	0.44	61:39	20	12	32
Total				**789**			**14**	**39**	**53**			**40**	**25**	**65**

Notes: Rates from ITE Trip Generation (10th Edition, 2017); DU – Dwelling Unit

As shown in ***Table 1***, the proposed project is projected to generate a total of 53 AM peak hour trips, 65 PM peak hour trips, and 789 daily trips.

1.2 PROJECT TRIP DISTRIBUTION

Project trip distribution involves the process of identifying probable destinations and traffic routes that would be utilized by the proposed project's traffic. The potential interaction between the proposed land use and surrounding regional access routes are considered to identify the probable routes onto which project traffic would distribute. The projected trip distribution for the proposed project is based on anticipated travel patterns to and from the project site. Exhibit 3A and Exhibit 3B show the general projected trip distribution of proposed project trips for the Harbor site and Jillson site respectively.

Project Summary

Total Site Area: ± 1.98 Acres
Net Site Area: ± 1.84 Acres (adjusted PL eliminating "tail")

Total Units: 37 Homes
- (19) Plan 1: ± 1,330 SF, 3 bedroom, 3 bath (tandem)
- (18) Plan 2: ± 1,633 SF, 3 bedroom, 3 bath, den (side-by-side)

Net Density: 20.1 Homes per Acre

Parking:
Provided: 85 Spaces (2.3 spaces per home)
- Garage: 74 Spaces
- Head In:11 Spaces (9' x 18')

Notes:
1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per civil engineer.
4. Civil engineer to verify all setbacks and grading information
5. Building Footprints might change due to the final design elevation style.
6. Open space area is subject to change due to the balcony design of the elevation.
7. Building setbacks are measured from property lines to building foundation lines.

CONCEPTUAL SITE PLAN
ROSEWOOD VILLAGE - HARBOR SITE
COMMERCE, CA
0 15 30 60
CONCEPT STUDY
 | 2018392 | 10-18-19

City Ventures

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TJW ENGINEERING, INC.

Exhibit 1A: Proposed Project Site Plan (Harbor Site)

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

Not to Scale

Project Summary (Overall)

Total Site Area: ± 3.78 Acres

Total Units: 96 Homes
- (51) Plan 1: ± 1,330 SF, 3 bedroom, 3 bath (tandem)
- (45) Plan 2: ± 1,633 SF, 3 bedroom, 3 bath, den (side-by-side)

Gross Density: 25.4 Homes per Acre

Parking:
Provided: 224 Spaces (2.33 spaces per home)
- Garage: 192 Spaces
- Head In: 23 Spaces (9' x 18')
- Parallel: 9 Spaces (8' x 22')

Project Summary (Jillson 1)

Total Site Area: ± 1.4 Acres
Net Site Area: ± 1.32 Acres (less adjacent parcel building area)

Total Units: 31 Homes
- (17) Plan 1: ± 1,330 SF, 3 bedroom, 3 bath (tandem)
- (14) Plan 2: ± 1,633 SF, 3 bedroom, 3 bath, den (side-by-side)

Gross Density: 22.14 Homes per Acre
Net Density: 23.48 Homes per Net Acre

Parking:
Provided: 69 Spaces (2.23 spaces per home)
- Garage: 62 Spaces
- Head In: 7 Spaces (9' x 18')

Project Summary (Jillson 2)

Total Site Area: ± 2.38 Acres

Total Units: 65 Homes
- (34) Plan 1: ± 1,330 SF, 3 bedroom, 3 bath (tandem)
- (31) Plan 2: ± 1,633 SF, 3 bedroom, 3 bath, den (side-by-side)

Gross Density: 27.31 Homes per Acre

Parking:
Provided: 155 Spaces (2.38 spaces per home)
- Garage: 130 Spaces
- Head In: 16 Spaces (9' x 18')
- Parallel: 9 Spaces (8' x 22')

Notes:

1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per civil engineer.
4. Civil engineer to verify all setbacks and grading information
5. Building Footprints might change due to the final design elevation style.
6. Open space area is subject to change due to the balcony design of the elevation.
7. Building setbacks are measured from property lines to building foundation lines.

City Ventures

CONCEPTUAL SITE PLAN

ROSEWOOD VILLAGE - JILLSON SITE

COMMERCE, CA

0 15 30 60

CONCEPT STUDY

 | 2019021 | 10-18-19

ARCHITECTS . PLANNERS . DESIGNERS

WHA.

ORANGE COUNTY . LOS ANGELES . BAY AREA

TJW ENGINEERING, INC.

Exhibit 1B: Proposed Project Site Plan (Jillson Street)

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

Not to Scale

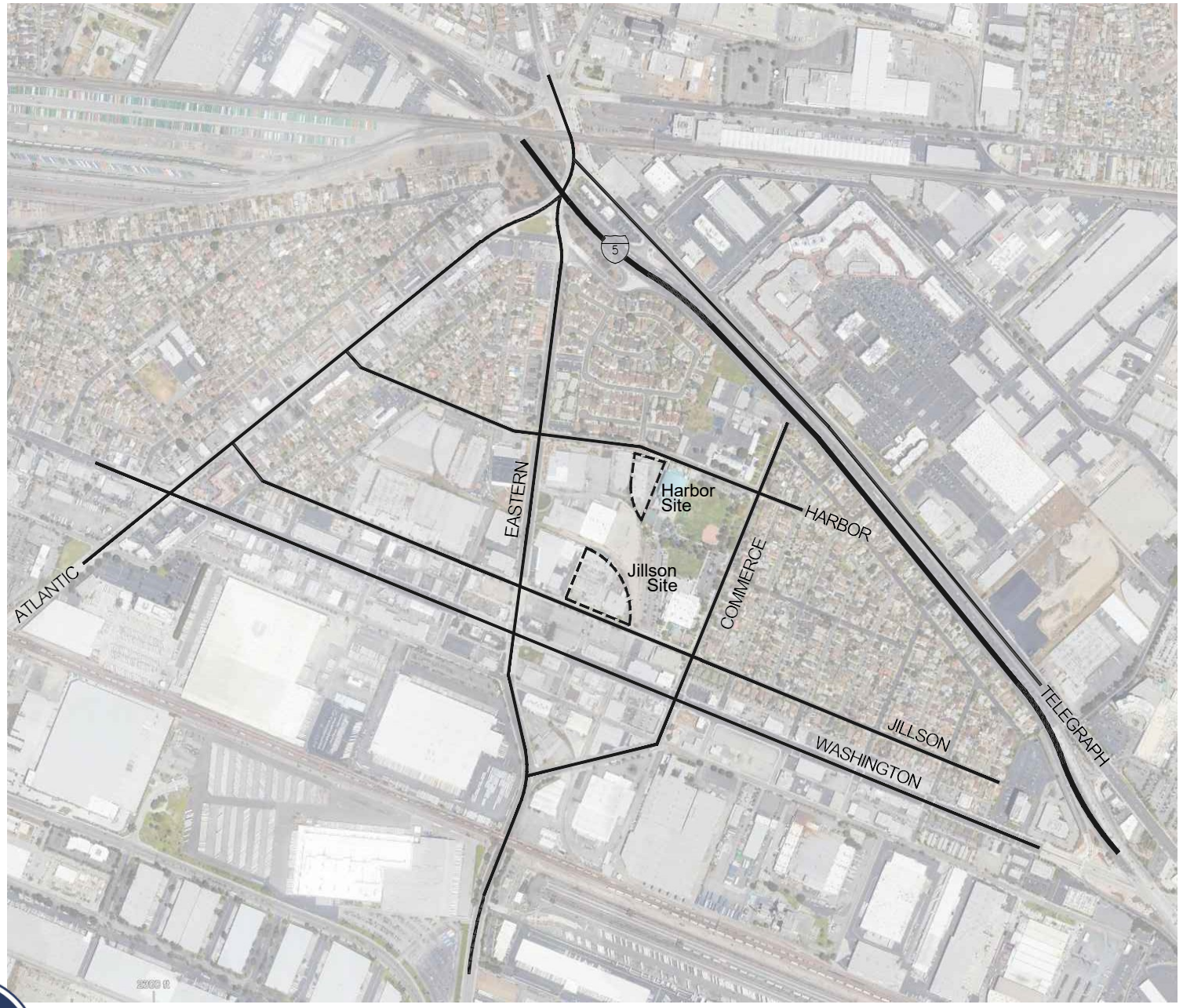

Exhibit 2: Project Location

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

TJW ENGINEERING, INC.

Not to Scale

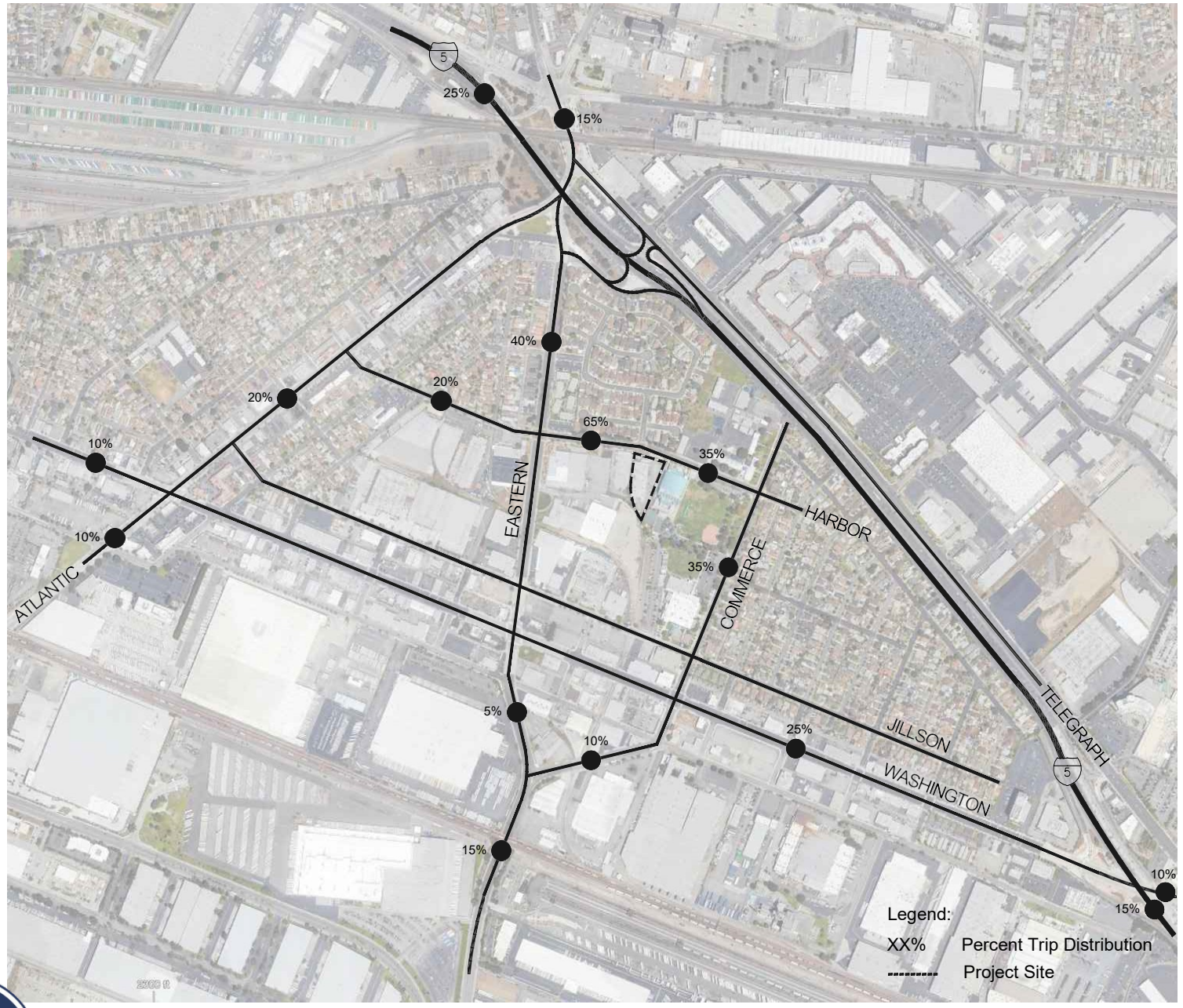

Exhibit 3A: Trip Distribution of Proposed Project Trips (Harbor Site)

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

TJW ENGINEERING, INC.

Not to Scale

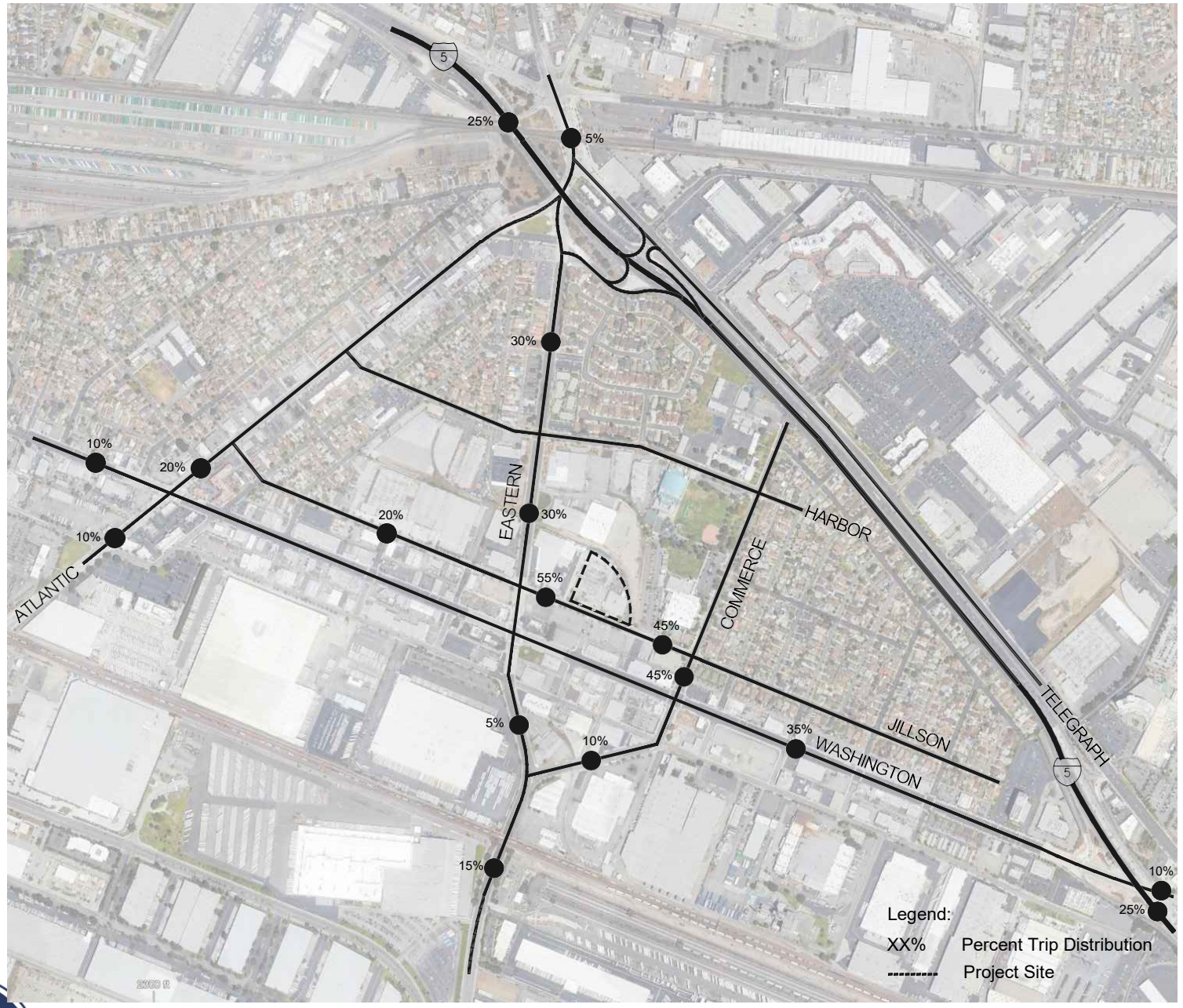

Exhibit 3A: Trip Distribution of Proposed Project Trips (Jillson Site)

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

TJW ENGINEERING, INC.

Not to Scale

2.0 ON-SITE AND OFF-SITE PARKING

2.1 EXISTING OFF-SITE PARKING SURVEY

A parking survey was conducted in the area neighboring the two project sites from 7:00 AM to 7:00 PM on Saturday, November 16th, 2019 and on Tuesday November 19th, 2019. For analysis purposes, the neighboring parking areas were separated into distinct parking zones that are identified in ***Exhibit 4***. The zones consist of the four parking lots that serve Rosewood Park, Commerce Civic Center Area, and the Brenda Villa Aquatic Center as well as street parking found along Harbor Street and Jillson Street. In total, all neighboring parking areas provide a total of 524 parking spaces.

In order to identify peak parking demand, the survey was conducted in one-hour intervals and the results are tabulated and shown in ***Table 2*** and ***Table 3***. Detailed parking survey information can be found in the ***Appendix***.

Table 2: *Weekday Parking Survey*

Zone	1	2	3	4	Harbor	Jillson	Total
7:00 AM	17	14	10	35	23	20	119
8:00 AM	26	24	5	35	***27***	25	142
9:00 AM	93	32	6	20	16	***37***	204
10:00 AM	102	31	8	22	18	36	217
11:00 AM	110	35	8	29	18	36	236
12:00 PM	106	35	14	37	22	33	247
1:00 PM	102	35	17	50	25	30	259
2:00 PM	111	36	12	31	13	18	221
3:00 PM	93	31	10	28	15	21	198
4:00 PM	84	28	9	40	14	14	189
5:00 PM	87	25	14	52	20	11	209
6:00 PM	***114***	***38***	***29***	***55***	21	9	**266**
7:00 PM	97	18	20	49	9	2	195
Inventory	**231**	**65**	**46**	**60**	**63**	**59**	**524**
% Max Occupied	**49%**	**58%**	**63%**	**92%**	**43%**	**63%**	**51%**

As shown in ***Table 2***, the weekday peak parking demand in the study area occurred at 6:00 PM when a total of 266 spaces were occupied (51% occupancy). The highest occupancy among the different parking zones occurred at 6:00 PM when a total of 55 spaces were occupied (92% occupancy) within Parking Zone 4.

The Harbor Site Project will replace Parking Zone 4 resulting in a loss of 60 parking spaces. However, the remaining parking zones are projected to accommodate the loss of 60 spaces as a total of 258 spaces remained unoccupied during the peak weekday parking demand. All parking zones and parking lots provide easy pedestrian accessibility to Rosewood Park, Commerce Civic Center Area, and the Brenda Villa Aquatic Center.

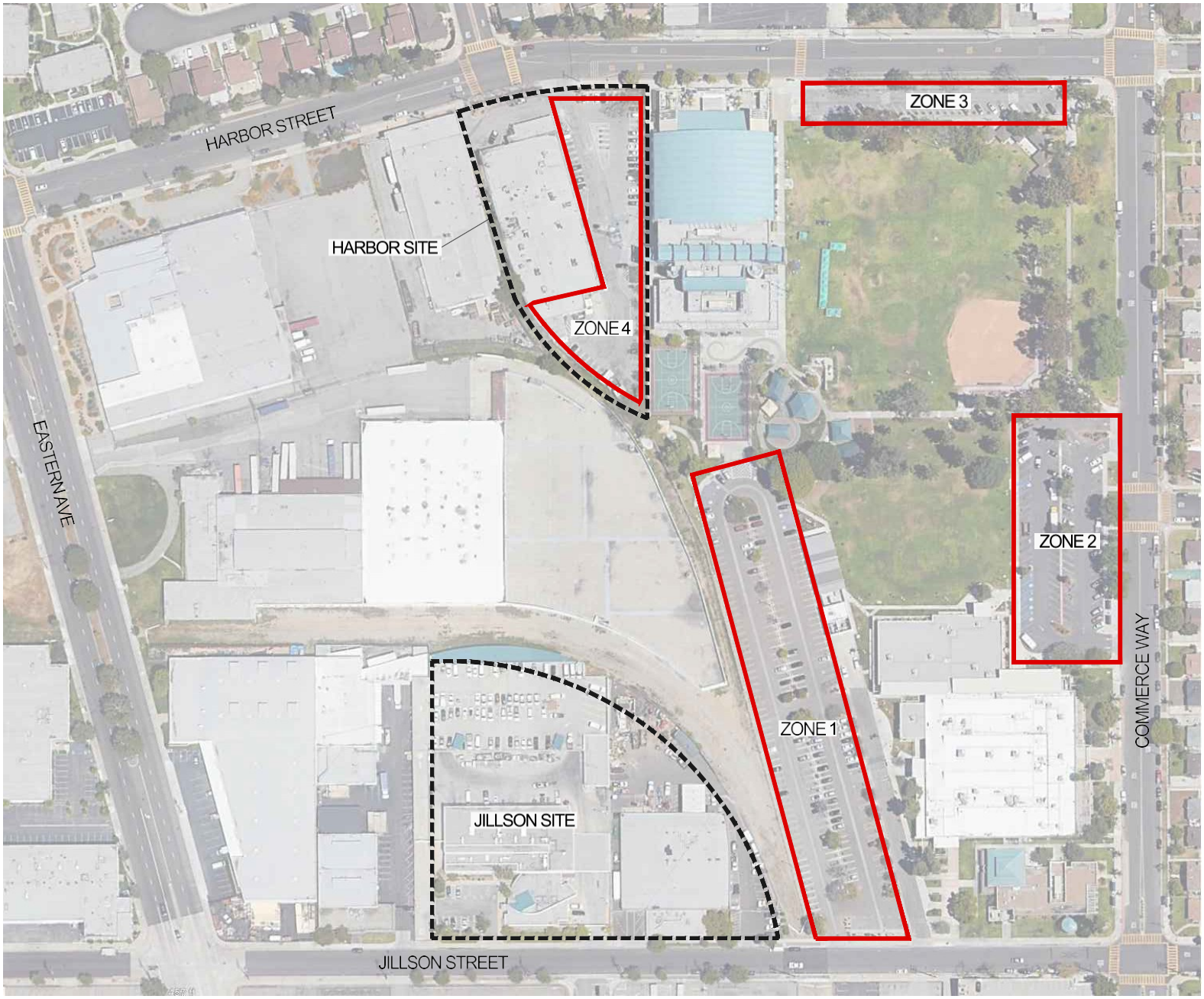

Exhibit 4: Parking Zones

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

TJW ENGINEERING, INC.

Not to Scale

Table 3: *Weekend Parking Survey*

Zone	1	2	3	4	Harbor	Jillson	Total
7:00 AM	0	9	0	1	***21***	8	39
8:00 AM	1	9	1	1	19	15	46
9:00 AM	14	11	2	4	19	17	67
10:00 AM	21	11	4	17	18	16	87
11:00 AM	25	15	7	24	17	***17***	105
12:00 PM	33	15	8	28	14	15	113
1:00 PM	***35***	14	30	31	15	15	140
2:00 PM	34	14	34	***43***	15	15	**155**
3:00 PM	32	12	***35***	38	12	12	141
4:00 PM	11	13	33	18	13	7	95
5:00 PM	8	11	29	7	11	2	68
6:00 PM	4	***16***	15	0	12	2	49
7:00 PM	2	13	9	0	12	2	38
Inventory	**231**	**65**	**46**	**60**	**63**	**59**	**524**
% Max Occupied	**15%**	**25%**	**76%**	**72%**	**33%**	**29%**	**30%**

As shown in ***Table 3***, the weekend peak parking demand in the study area occurred at 2:00 PM when a total of 155 spaces were occupied (30% occupancy). The highest occupancy among the different parking zones occurred at 3:00 PM when a total of 35 spaces were occupied (76% occupancy) within Parking Zone 3.

As mentioned earlier, the Harbor Site Project will replace Parking Zone 4 resulting in a loss of 60 parking spaces. However, the remaining parking zones are projected to accommodate the loss of 60 spaces as a total of 369 spaces remained unoccupied during the peak weekend parking demand. All parking zones and parking lots provide easy pedestrian accessibility to Rosewood Park, Commerce Civic Center Area, and the Brenda Villa Aquatic Center.

2.2 ON-SITE PARKING

Section 19.21.040 of the *City of Commerce Municipal Code* outlines the City of Commerce's minimum parking requirements for various land use classifications. ***Table 4*** summarizes the minimum on-site parking requirements for the proposed project.

As shown in ***Table 4*** the total required spaces for the Harbor Site Project are 74 garage spaces and 18.5 guest spaces. The total required spaces for the Jillson Site are 192 garage spaces and 48 guest spaces. Guest parking can be accommodated off-site as the existing parking survey showed Harbor Street and Jillson Street to have max occupancy rates of 43% and 63%, respectively. This amounts to a total of 36 unoccupied spaces on Harbor Street and 22 unoccupied spaces on Jillson Street. Guest parking could also be accommodated in the surrounding parking lots; it should be noted, a shared parking agreement will be developed for these surrounding parking lots.

Table 4: *Municipal Code On-Site Parking Requirements*

Project Site	Type of Parking	Land Use	Units	Required Parking Spaces/Unit	Total Spaces Required	Total Spaces Provided
Harbor Site	Garage	Multifamily	37	2.0	74	74
	Guest			0.5	18.5	11
Jillson Site 1	Garage	Multifamily	31	2.0	62	62
	Guest			0.5	15.5	7
Jillson Site 2	Garage	Multifamily	65	2.0	130	130
	Guest			0.5	32.5	25
Jillson Site (Overall)	Garage	Multifamily	96	2.0	192	192
	Guest			0.5	48	23

Source: City of Commerce Municipal Code Table 19.21.040A

3.0 SIGHT DISTANCE AND PROJECT ACCESS

3.1 SIGHT DISTANCE

A sight distance analysis for the proposed project driveway has been prepared based on "corner sight distance" requirements determined by Index 405.1 of the *Caltrans Highway Design Manual* (HDM), latest edition. As a conservative approach, minimum corner sight distance requirements for rural driveways were used for this analysis. For rural driveways, the minimum corner sight distance should be equal to the stopping sight distance shown in ***Table 5***. The minimum stopping sight distances are based on the design speed, as displayed in Table 201.1 of the HDM.

Table 5: *Stopping Sight Distance*

Design Speed (mph)	Stopping Sight Distance (ft)
25	**150**
30	**200**
35	250
40	300
45	360
50	430

Source: Table 201.1, Highway Design Manual (July 2, 2018)
Note: mph = miles per hour; ft = feet

In this analysis, the movements being analyzed at the project driveway intersections are movements from exiting vehicles onto Harbor Street and Jillson Street. Posted speed limits on Harbor Street and Jillson Street are 30 miles per hour and 25 miles per hour, respectively.

Exhibit 5 displays the sight distance conditions at the project driveway in relation to the existing sidewalk, striping, and parking on Harbor Street and Jillson Street. The exhibit shows the required 15-foot setback from the edge of travel way accounting for curb side parking. As shown in ***Table 5***, a stopping sight distance of 200-feet is required at the Harbor Street driveway and a stopping sight distance of 150-feet at the Jillson Street.

As shown in ***Exhibit 5***, the stopping sight distance requirements would be impaired by street parking along Harbor Street and Jillson Street. To meet sight distance standards along Harbor Street, existing red curb east and west of the proposed driveway should remain. In the case of the proposed driveway at Jillson Street, approximately 37 feet of red-curb should be painted along Jillson Street.

However, as noted in Index 405.1 of the Highway Design Manual, for urban driveways corner sight distance requirements as described previously do not apply. Parking should be prohibited per California Manual on Uniform Traffic Control Devices (CA MUTCD) Section 3B.19. Section 3B.19 recommends a clearance of 6-feet measured from the curb return should be provided at both sides of a driveway. It is recommended that, at a minimum, CA MUTCD guidance be followed.

3.2 PROJECT ACCESS

Site access points should be constructed per City standards or as directed by the City Engineer. Project access for the Harbor Site is planned via one full access driveway along Harbor Street. The driveway will not be gated and will provide pedestrian access via sidewalks located next to the driveway that will connect directly to Harbor Street.

Project access for the Jillson site is planned via one full access driveway along Jillson Street. The driveway will not be gated and will provide pedestrian access via sidewalks located next to the driveway that will connect directly to Jillson Street.

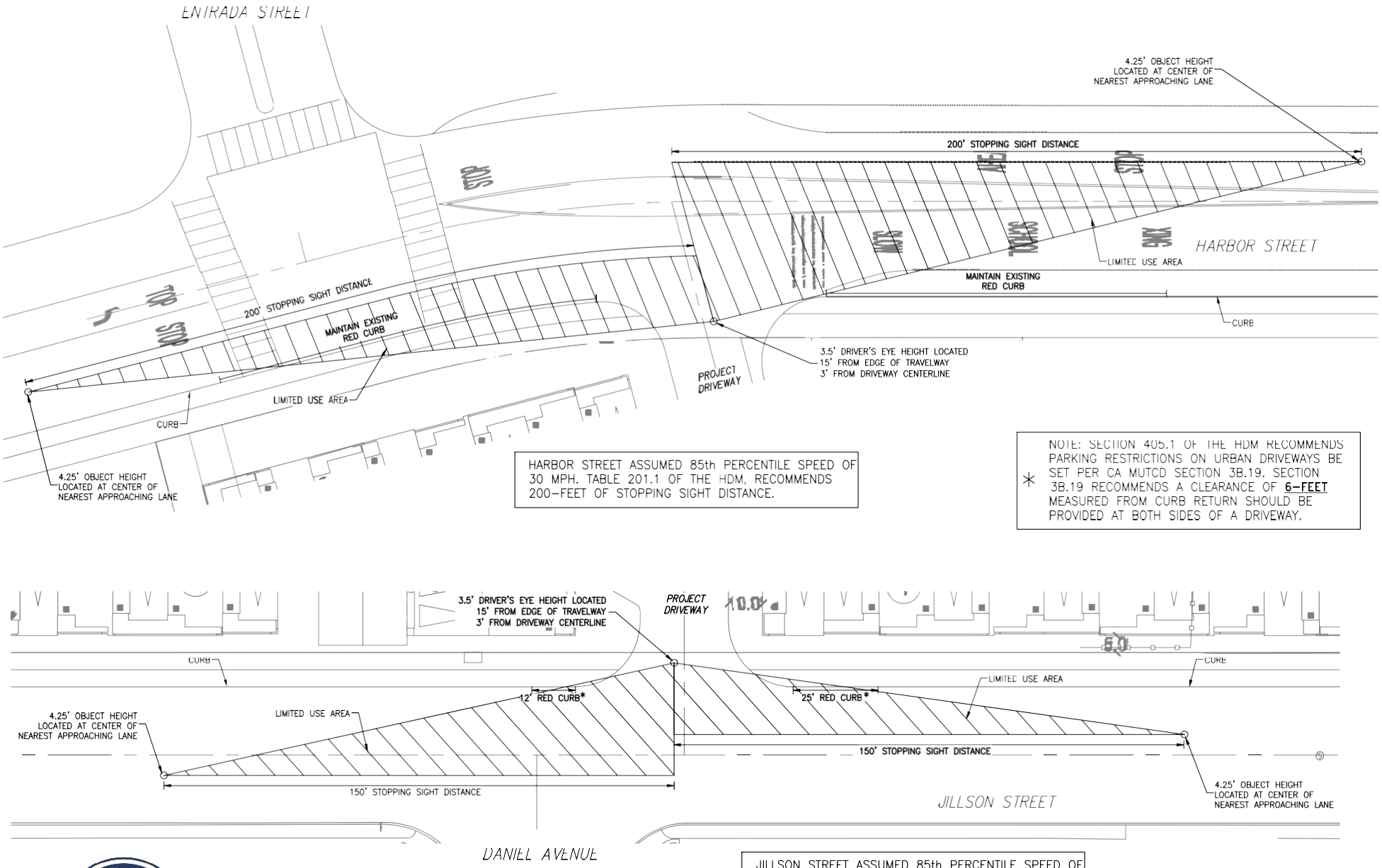

Exhibit 5: Sight Distance Analysis

CVR-19-003: Harbor and Jillson Site Focused Traffic Study

TJW ENGINEERING, INC.

Not to Scale

Appendices

City of Commerce
Civic Center Area
2535 Commerce Way

Tuesday, November 19th, 2019

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 1	Regular	198	14	22	74	90	94	94	92	101	86	78	78	103	88
	Handicap	12	0	0	5	4	3	2	1	1	1	0	2	8	8
	Senior	10	2	1	11	5	9	8	8	9	6	5	6	3	1
	Electric Vehicles	8	1	2	2	3	4	2	1	0	0	1	1	0	0
	City Vehicles	3	0	1	1	0	0	0	0	0	0	0	0	0	0
	Subtotal	**231**	**17**	**26**	**93**	**102**	**110**	**106**	**102**	**111**	**93**	**84**	**87**	**114**	**97**
	Total Occupancy	231	17	26	93	102	110	106	102	111	93	84	87	114	97
	Total Percent		**7%**	**11%**	**40%**	**44%**	**48%**	**46%**	**44%**	**48%**	**40%**	**36%**	**38%**	**49%**	**42%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 2	Regular	40	13	20	24	24	28	28	28	32	27	24	22	36	18
	Handicap	5	0	1	2	1	2	2	2	1	1	1	1	1	0
	Department Head	6	1	1	1	1	1	1	1	1	1	1	1	1	0
	Veterans	3	0	1	1	1	1	1	1	0	0	0	0	0	0
	Council	6	0	0	0	0	0	0	0	0	0	0	0	0	0
	20 Mins	5	0	1	4	4	3	3	3	2	2	2	1	0	0
	Subtotal	**65**	**14**	**24**	**32**	**31**	**35**	**35**	**35**	**36**	**31**	**28**	**25**	**38**	**18**
	Total Occupancy	65	14	24	32	31	35	35	35	36	31	28	25	38	18
	Total Percent		**22%**	**37%**	**49%**	**48%**	**54%**	**54%**	**54%**	**55%**	**48%**	**43%**	**38%**	**58%**	**28%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 3	Regular	45	10	5	6	8	8	14	17	11	10	9	14	29	20
	Handicap	1	0	0	0	0	0	0	0	1	0	0	0	0	0
	Subtotal	**46**	**10**	**5**	**6**	**8**	**8**	**14**	**17**	**12**	**10**	**9**	**14**	**29**	**20**
	Total Occupancy	46	10	5	6	8	8	14	17	12	10	9	14	29	20
	Total Percent		**22%**	**11%**	**13%**	**17%**	**17%**	**30%**	**37%**	**26%**	**22%**	**20%**	**30%**	**63%**	**43%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 4	Regular	54	30	30	18	21	26	34	47	30	27	38	50	54	48
	Handicap	5	5	4	1	0	2	2	2	0	0	1	2	1	1
	Reserved	1	0	1	1	1	1	1	1	1	1	1	0	0	0
	Subtotal	**60**	**35**	**35**	**20**	**22**	**29**	**37**	**50**	**31**	**28**	**40**	**52**	**55**	**49**
	Total Occupancy	60	35	35	20	22	29	37	50	31	28	40	52	55	49
	Total Percent		**58%**	**58%**	**33%**	**37%**	**48%**	**62%**	**83%**	**52%**	**47%**	**67%**	**87%**	**92%**	**82%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
On Street	North Side Harbor St 1	16	9	10	5	5	5	5	5	5	5	5	5	5	3
	South Side Habor St 1	13	7	5	5	6	7	8	8	7	6	6	6	6	3
	North Side Harbor St 2	20	3	10	3	4	3	6	8	1	2	0	2	1	0
	South Side Habor St 2	14	4	2	3	3	3	3	4	0	2	3	7	9	3
	North Side Jillson St	26	7	9	16	13	13	13	13	5	8	3	3	3	0
	South Side Jillson St	33	13	16	21	23	23	20	17	13	13	11	8	6	2
	Subtotal	**122**	**43**	**52**	**53**	**54**	**54**	**55**	**55**	**31**	**36**	**28**	**31**	**30**	**11**
	Total Occupancy	122	43	52	53	54	54	55	55	31	36	28	31	30	11
	Total Percent		**35%**	**43%**	**43%**	**44%**	**44%**	**45%**	**45%**	**25%**	**30%**	**23%**	**25%**	**25%**	**9%**

Counts Unlimited, Inc.
PO Box 1178
Corona, CA 92878
951-268-6268

City of Commerce
Civic Center Area
2535 Commerce Way

Saturday, November 16th, 2019

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 1	Regular	198	0	1	14	21	25	33	34	33	31	11	8	4	2
	Handicap	12	0	0	0	0	0	0	1	1	0	0	0	0	0
	Senior	10	0	0	0	0	0	0	0	0	1	0	0	0	0
	Electric Vehicles	8	0	0	0	0	0	0	0	0	0	0	0	0	0
	City Vehicles	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	Subtotal	**231**	**0**	**1**	**14**	**21**	**25**	**33**	**35**	**34**	**32**	**11**	**8**	**4**	**2**
	Total Occupancy	231	0	1	14	21	25	33	35	34	32	11	8	4	2
	Total Percent		**0%**	**0%**	**6%**	**9%**	**11%**	**14%**	**15%**	**15%**	**14%**	**5%**	**3%**	**2%**	**1%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 2	Regular	40	9	9	11	11	15	15	14	14	12	13	11	16	13
	Handicap	5	0	0	0	0	0	0	0	0	0	0	0	0	0
	Department Head	6	0	0	0	0	0	0	0	0	0	0	0	0	0
	Veterans	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	Council	6	0	0	0	0	0	0	0	0	0	0	0	0	0
	20 Mins	5	0	0	0	0	0	0	0	0	0	0	0	0	0
	Subtotal	**65**	**9**	**9**	**11**	**11**	**15**	**15**	**14**	**14**	**12**	**13**	**11**	**16**	**13**
	Total Occupancy	65	9	9	11	11	15	15	14	14	12	13	11	16	13
	Total Percent		**14%**	**14%**	**17%**	**17%**	**23%**	**23%**	**22%**	**22%**	**18%**	**20%**	**17%**	**25%**	**20%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 3	Regular	45	0	1	2	4	7	8	30	34	35	32	28	15	9
	Handicap	1	0	0	0	0	0	0	0	0	0	1	1	0	0
	Subtotal	**46**	**0**	**1**	**2**	**4**	**7**	**8**	**30**	**34**	**35**	**33**	**29**	**15**	**9**
	Total Occupancy	46	0	1	2	4	7	8	30	34	35	33	29	15	9
	Total Percent		**0%**	**2%**	**4%**	**9%**	**15%**	**17%**	**65%**	**74%**	**76%**	**72%**	**63%**	**33%**	**20%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Zone 4	Regular	54	1	1	4	17	23	27	31	40	37	18	7	0	0
	Handicap	5	0	0	0	0	1	1	0	3	1	0	0	0	0
	Reserved	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	Subtotal	**60**	**1**	**1**	**4**	**17**	**24**	**28**	**31**	**43**	**38**	**18**	**7**	**0**	**0**
	Total Occupancy	60	1	1	4	17	24	28	31	43	38	18	7	0	0
	Total Percent		**2%**	**2%**	**7%**	**28%**	**40%**	**47%**	**52%**	**72%**	**63%**	**30%**	**12%**	**0%**	**0%**

		Inventory	7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
On Street	North Side Harbor St 1	16	8	8	8	8	8	7	7	7	6	6	5	5	5
	South Side Habor St 1	13	8	7	6	6	6	6	5	5	5	5	5	7	7
	North Side Harbor St 2	20	5	4	4	4	3	1	1	1	1	1	1	0	0
	South Side Habor St 2	14	0	0	1	0	0	0	2	2	0	1	0	0	0
	North Side Jillson St	26	0	5	6	5	6	5	5	5	6	2	0	0	0
	South Side Jillson St	33	8	10	11	11	11	10	10	10	6	5	2	2	2
	Subtotal	**122**	**29**	**34**	**36**	**34**	**34**	**29**	**30**	**30**	**24**	**20**	**13**	**14**	**14**
	Total Occupancy	122	29	34	36	34	34	29	30	30	24	20	13	14	14
	Total Percent		**24%**	**28%**	**30%**	**28%**	**28%**	**24%**	**25%**	**25%**	**20%**	**16%**	**11%**	**11%**	**11%**

Counts Unlimited, Inc.
PO Box 1178
Corona, CA 92878
951-268-6268

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2426
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

September 4, 2020

Sonia Griego, Associate Planner
City of Commerce
Economic Development and Planning
2535 Commerce Way
Commerce, CA 90040

Dear Ms. Griego:

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "ROSEWOOD VILLAGE," IS PROPOSING TO CONSTRUCT 133 SINGLE-FAMILY ATTACHED RESIDENTIAL UNITS ON THREE PARCELS, LOCATED AT 5550 HARBOR STREET, COMMERCE, FFER 2020005149

The Notice of Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

Under XV, Public Services, a.i) Fire Protection of the Initial Study, paragraph one, sentence one should be corrected to state that Fire Station 50 is the jurisdictional station (1st-due) for the Project Site. It is located at 2327 S. Saybrook Avenue in the City of Commerce, approximately 1.8 miles east of the project site. Fire Station 27, located at 6031 Rickenbacker Road, approximately 1.7 miles south of the project site, is the 2nd-due station.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.

2. Every building constructed shall provide an adequate water supply for fire protection purposes. The fire hydrant spacing shall be 300. Fire flow requirements to be determined at the Tentative Tract Map Review. An approved fire sprinkler system in the proposed building in compliance with applicable codes and regulations will qualify for a fire flow reduction as outlined Table B105.1 of the County of Los Angeles Fire Code.

3. 503.1 Where required. Fire Apparatus Access Roads shall be provided and maintained in accordance with Sections 503.1.1 through 503.1.3.

4. 503.1.1 Buildings and facilities. Approved Fire Apparatus Access Roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirements of this section and shall extend to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.

5. 503.2 Specifications. Fire Apparatus Access Roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.9.

6. 503.2.1 Dimensions. Fire Apparatus Access Roads shall have an unobstructed width of not less than 20 feet, exclusive of shoulders, except as specified in Sections 503.2.1.1 through 503.2.1.2.2.2 and for approved security gates in accordance with Section 503.6. Fire Apparatus Access Roads shall have an unobstructed vertical clearance clear to the sky.

7. 503.2.1.2 Commercial, industrial, and multifamily-residential developments. Fire Apparatus Access Roads for commercial, industrial, and multifamily-residential developments shall be installed and arranged in accordance with Sections 503.2.1.2.1 through 503.2.1.2.2. For purposes of this section, the highest roof surface shall be determined by measurement of the vertical distance between the access roadway and the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater.

8. 503.2.1.2.2 Where the highest roof surface exceeds 30 feet. For buildings where the vertical distance between the access roadway and the highest roof surface exceeds 30 feet, an approved Fire Apparatus Access Roadway with a minimum width of 28 feet, exclusive of shoulders, shall be provided in the immediate vicinity of the building or portion thereof. This roadway shall have an unobstructed clearance of clear to the sky.

9. 503.2.1.2.2.1 Proximity to Building. At least one required access route meeting this condition shall be located such that the edge of the Fire Apparatus Access Roadway, not including shoulder, that is closest to the building being served, is between 10 feet and 30 feet, from the building, as determined by the fire code official, and shall be positioned parallel to one entire side of the building. The side of the building on which the Fire Apparatus Access Road is positioned shall be approved by the fire code official.

10. 503.2.2.1 Dimensions maintained. The dimensions of approved fire apparatus roads shall be maintained as originally approved by the fire code official.

11. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

12. The proposed projects, Tentative Tract map 82890, Tentative Tract Map 82891, and Tentative Tract Map 82892 are currently under review by the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit.

13. At this time the proposed structures within the development(s) do not meet the current access requirements as set forth in the County of Los Angeles Fire Code Chapter 5, Section 503 Paragraph(s) 503.1, 503.1.1, 503.2, 503.2.1 503.2.1.2, 503.2.1.2.2 , 503.2.1.2.2.1 and 503.2.2.1.

14. The applicant is working to resolve the non-compliance with the access and will resubmit to the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit when the project meets the requirements as set forth in the County of Los Angeles Fire Code.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department recommends that a Phase I Environmental Site Assessment be conducted for the project site, if not done so already. HHMD has no additional comments at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac