

FINAL ENVIRONMENTAL IMPACT REPORT

SCH# 2016091024

CITADEL OUTLETS EXPANSION & 10-ACRE DEVELOPMENT PROJECT COMMERCE, CALIFORNIA



LEAD AGENCY:

**CITY OF COMMERCE
PUBLIC WORKS AND DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION
2535 COMMERCE WAY
COMMERCE, CALIFORNIA 90040**

REPORT PREPARED BY:

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 S. HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745**

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The revisions made to the Draft EIR as part of this Final EIR's preparation have been noted using underlining to note additions or revisions and ~~strikeout~~ was used to indicate deletions.

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EXECUTIVE SUMMARY

1. PROJECT OVERVIEW

The City of Commerce Public Works and Development Services Department (also referred to hereinafter as the *Lead Agency*) is reviewing a proposal that would permit the expansion of the Citadel shopping center and a 10-Acre development site. The project Applicant is Citadel Holdings Group, LLC, 4100 MacArthur Boulevard, Suite #100, Newport Beach, California 92660, and the Wash-Tel Commerce, LLC, 4100 MacArthur Boulevard, Suite #100, Newport Beach, California 92660.

The planning area is located along the northerly side of Telegraph Road between Hoefner Avenue (on the west) and continuing east to Washington Boulevard. The land occupied by the existing industrial uses located to the west of Tubeway Avenue and the Commerce Casino and Hotel is not part of the proposed project. The proposed project would involve the development of a number of underutilized properties with new retail uses, new hotels, entertainment uses, offices, and other uses.

2. PURPOSE OF THIS EIR

The Draft Environmental Impact Report (Draft EIR) analyzed the proposed project's short-term (construction-related) impacts and long-term (operational) impacts. The City of Commerce (as Lead Agency for this project) circulated a *Notice of Preparation* (NOP) and an Initial Study for a 30-day period to inform the public and other agencies that a Draft EIR would be prepared for the proposed project. In addition, the NOP and the Initial Study indicated the scope and content of the environmental analysis that would be considered in the Draft EIR.

The Draft EIR was then circulated for public review for a period of 45 days. During this 45-day review period, agencies, the public, and other interested parties commented on the Draft EIR. The City of Commerce then oversaw the preparation of responses to the individual comments that were received, and both the comments and the City's responses were incorporated into the *Final EIR*. The comments and the responses are included in Volume 4. The Final EIR will then be considered along with the project by the City Council.

3. SCOPE OF THE ENVIRONMENTAL ANALYSIS

As part of the environmental review for the proposed project, the Lead Agency prepared and circulated an Initial Study that included a preliminary evaluation of potential impacts associated with the project's construction and subsequent operation. The Initial Study provided the basis for determining the nature and scope of the environmental analysis that should be undertaken as part of the EIR's preparation. The environmental analysis in this EIR focuses on those issues where it was determined, as part of the Initial Study's preparation, that there was a potential for significant environmental impacts in the absence of mitigation. This EIR considers those issues that were identified in the Initial Study as being potentially significant.

4. PROJECT LOCATION

The project area is located in the north-central portion of the City of Commerce. The City of Commerce is located approximately six miles southeast of downtown Los Angeles and is bounded by Montebello on the east, unincorporated East Los Angeles on the north, the cities of Vernon, Bell, and Maywood on the west, and the City of Bell Gardens on the south. The entire project area, referred to herein after as the “Planning Area,” is located along the north side of Telegraph Road between Hoefner Avenue (on the west) and continuing east to Washington Boulevard. The land occupied by the existing Commerce Casino and Hotel and the industrial properties located to the west of Tubeway Avenue are not part of the proposed project. For the purposes of this CEQA analysis, the three distinct geographic areas that comprise the Planning Area, are referred to as Area 1, Area 2, and Area 3. The geographical characteristics for the three areas are summarized below:

- *Area 1* includes the existing Citadel shopping center complex and the majority of the new improvements will be located in the northeast portion of the Citadel shopping center. These new improvements are collectively referred to as Phase 5. The portion of Area 1 that will be developed includes a surface parking area located in the northeast corner of the existing Citadel Outlets center and two existing concrete tilt-up buildings. The Assessor’s Parcel Numbers that are applicable to Area 1 include ~~6336-019-930~~ 6336-019-030, ~~6336-019-931~~ 6336-019-031, 6336-019-033, 6336-019-034, ~~9306-024-017~~, 6336-024-017, and 6336-024-018.
- *Area 2* consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet. Gaspar Avenue is the demarcation between Area 1 and Area 2. The Assessor’s Parcel Numbers that are applicable to Area 2 include 6336-018-920, 6336-018-805, and 6336-017-908.
- *Area 3* consists of approximately 10 acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. Washington Boulevard extends along the east side of Area 3 while Telegraph Road extends along the south side. The Assessor’s Parcel Number that is applicable to Area 3 is 6336-010-908.

5. ENVIRONMENTAL SETTING

The Planning Area consists of urban development that includes a range of land uses consisting of commercial, industrial, warehousing, surface parking areas, and vacant land. The majority of the existing vacant land is included in Area 2 and Area 3. However, all of the existing vacant land includes parcels that were formerly developed. The affected area encompasses a total land area of approximately 44 acres that include approximately 8 acres in Area 1; 26 acres in Area 2; and 10 acres in Area 3. The environmental setting of the three project areas are summarized below:

- *Area 1* includes an area located within the existing Citadel shopping center complex consisting of approximately eight acres. Area 1 is predominately located within the northeast portion of the Citadel, which is presently occupied by surface parking and two warehouses.

- *Area 2* consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet. Area 2 is occupied by three buildings, two of which are vacant.
- *Area 3* consists of approximately ten acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. Washington Boulevard extends along the east side of Area 3 while Telegraph Road extends along the south side. The majority of the site is vacant though a single building used as a furniture outlet retailer occupies the western portion of Area 3.

The existing land uses and development within the three project areas (Area 1, Area 2, and Area 3) total 190,243 square feet including 79,375 square feet in Area 1; 88,368 square feet in Area 2; and 22,500 square feet in Area 3. The existing vacant and undeveloped parcels located within the Planning Area were previously occupied by development that has since been demolished. The existing Citadel Outlet complex contains a variety of commercial retail, office, and hotel uses. The main Citadel complex, which contains retail, hospitality, and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3). The existing land uses and development within the three areas are summarized below in Table 1.

Table 1
Summary of Existing Uses within Project Area

Area	Use	Name	Bldg. Area (sq. ft.)	Address
Area 1	Surface Parking	NA	NA	NA
	Industrial Bldg.	Unicorp & Uninex Intl.	38,750 sq. ft.	5780 Smithway St.
	Industrial Bldg.	New Unoccupied Bldg.	40,625 sq. ft.	5788 Smithway St.
Area 2	Industrial Bldg.	Justman Packaging & Display	14,744 sq. ft.	5819 Telegraph Rd.
	Industrial Bldg.	Vacant Bldg	36,812 sq. ft.	2366 Travers Ave.
	Industrial Bldg.	Vacant Bldg.	36,812 sq. ft.	5901 Telegraph Rd.
	Vacant Land	Grading and Site Preparation	NA	NA
Area 3	Vacant Land	Graded Land	NA	NA
	Commercial Bldg.	Los Angeles Furniture Online	22,500 sq. ft.	6241 Telegraph Rd.

Source: Blodgett Baylosis Environmental Planning and Los Angeles County Tax Assessor

6. PROJECT DESCRIPTION

Area 1 includes a portion of the existing Citadel shopping center complex. The new elements proposed as part of the Area 1 development are outlined below.

- *Building 20* will be a newly constructed 15,000 square-foot, three-level commercial building. The first level will consist of approximately 7,030 square feet while the mezzanine will have approximately 1,810 square feet. The second level will contain 6,160 square feet of floor area.

- *Building 21* will be a new 107,150 square-foot commercial building that will be constructed immediately south of Building 20.
- *New and expanded parking structures* will provide a total of 1,618 spaces. The first parking structure will consist of four levels and provide total of approximately 750 parking spaces. The new parking structure will be constructed below the two hotel buildings. A second six-level parking structure consisting of 630 stalls will be constructed north of an existing five-level parking structure. This existing parking structure will be expanded by 238 spaces.
- *Traveler's Hotel* will be constructed in the northeast portion of the Phase 5 area. This five-level hotel will contain approximately 174 guest rooms. This hotel will have a total floor area of 80,000 square feet. The maximum height of the hotel/parking structure will be approximately 150 feet.
- *Loft Hotel* will be constructed south of the Traveler's Hotel and will also be constructed over the parking structure. This hotel building will consist of five levels on top of the four-level parking structure. This hotel will contain 96 guest rooms with a total floor area of 98,000 square feet.
- The *Food/Retail* will include approximately 41,571 square feet of additional retail/food related uses.
- *A New/Expanded Parking Structures* will be constructed in the southern portion of Area 1. The new parking structure will consist of six levels (one subterranean and five above-ground levels) and will contain up to 680 stalls. In addition, an existing five-level parking structure will be expanded to provide an additional 238 parking spaces.

Other improvements that will be located in Area 1 include a new Grand Fountain Plaza, artwork, pedestrian paths, safety and decorative lighting, landscaping, and a bus/transit area. A new monorail will be constructed that will extend through the existing Citadel Outlets continuing to Area 2.

Area 2 consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet. Gaspar Avenue is the demarcation between Area 1 and Area 2. The new elements proposed as part of the Area 2 (Phase 6) development are outlined below.

- *Building 22* will be a new 46,834 square-foot commercial retail building that will include both single-level and two-level tenant spaces.
- *Building 23* will be a new 23,107 square-foot retail building that will be constructed immediately east of Building 22.
- *A Recreational Commercial* use (referred to as an "Adventure Experiential Retail"), consisting of two levels and 120,000 square feet of floor area, will be centrally located within Area 2. A surface parking area that will accommodate both conventional and oversized parking will be located to the rear (north side) of the building.

- A new *Hotel and Parking Structure* will be located in the northeastern portion of Area 2. The new parking structure will consist of four parking levels that will accommodate approximately 700 parking spaces. A new hotel, consisting of nine floors and 185,000 square feet, will be constructed over the parking structure and will contain approximately 500 guest rooms.
- A *Movie/Entertainment Complex* will consist of three levels and will include approximately 150,000 square feet of floor area. Small fast-food restaurants that will largely cater to those attending the theater along with an outside court area will be located along the theater's west facing elevation. A 150-foot tall design element (referred to as an Icon Tower) will be situated near the theater building's southeast corner.
- A *Restaurant*, consisting of approximately 3,140 square feet, will be located in the westernmost portion of Area 2.

Area 3 consists of approximately ten acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. The new elements that are proposed as part of the Area 3 development are outlined below.

- *Fast Food Restaurant Pad 1* will be a new 2,000 square-foot restaurant located in the northeastern portion of Area 3.
- *Fast Food Restaurant Pad 2* will be a new 4,400 square-foot restaurant located in the eastern portion of Area 3 along the Washington Boulevard frontage.
- *Sit Down Restaurant Pad 3* will be a new 5,000 square-foot restaurant located on the southeast corner of Area 3. This restaurant will also include an outdoor dining area. A total of 77 parking spaces will be provided.
- *Fast Food Restaurant Pad 4* will include a new 2,000 square-foot restaurant located in the southwest portion of Area 3 along the Telegraph Road frontage.
- The *Pad 5 Alternative* will include either a *Fast Food Restaurant* consisting of 4,500 square feet of floor area and 73 parking stalls or a four-level, 70,000 square-foot office building that may be a public or institutional use.
- A new *Warehouse/Industrial Building* will be located in the northwest portion of Area 3. This building will have a total floor area of approximately 55,000 square feet. A total of seven loading docks will be located along the building's west-facing elevation. Access to the truck receiving and loading area will be secured by gates.

The proposed *new* development within the three areas (Area 1, Area 2, and Area 3) will have a total floor area of 1,007,202 square feet. The new development will consist of approximately 237,662 square feet of retail uses; 358,000 square feet of hotel uses totaling 770 rooms; 270,000 square feet of theater, entertainment, and recreation uses; 16,540 square feet of food serving uses; 70,000 square feet of office uses; and 55,000 square feet of industrial uses. This breakdown in land uses assumes that Pad 5 in Area 3

will be developed as an office use instead of a fast food restaurant. The proposed land uses and development for the three project areas are summarized below in Table 2.

Table 2
Summary of Proposed Development within the Planning Area

Area	Project Element	Details	Description
Area 1	Building 20 Retail	15,000 sq. ft.	Three level commercial retail building.
	Building 21 Retail	107,150 sq. ft.	One and two level multi-tenant retail building.
	Traveler's Hotel	80,000 sq. ft.	Five level, 174 room hotel.
	Loft Hotel	93,000 sq. ft.	Five level, 96 room hotel.
	Food/Retail	45,571 sq. ft.	Restaurant and retail uses.
	Parking Structure	750 spaces	Four level parking structure containing 750 spaces.
	New Parking Structure	680 spaces	Six level parking structure containing up to 680 spaces.
	Parking Structure Expansion	238 spaces	Expansion of existing five level parking structure 238 spaces.
Area 2	Building 22 Retail	46,834 sq. ft.	Single and two level multi-tenant retail spaces.
	Building 23 Retail	23,107 sq. ft.	Single and two level multi-tenant retail spaces.
	Recreation/Commercial Bldg.	120,000 sq. ft.	Two level adventure experiential commercial.
	Hotel	185,000 sq. ft.	Nine levels over the parking structure with 500 guest rooms.
	Gaspar Food Pad	3,140 sq. ft.	Single level restaurant.
	Entertainment Complex	150,000 sq. ft.	Three level theater building & supporting restaurant uses.
	Parking Structure	700 parking spaces	Parking structure with four levels below the hotel.
Area 3	Pad 1 Fast Food Restaurant	2,000 sq. ft.	Fast food restaurant with drive-thru lane.
	Pad 2 Fast Food Restaurant	4,400 sq. ft.	Fast food restaurant with drive-thru lane.
	Pad 3 Restaurant	5,000 sq. ft.	Sit down restaurant.
	Pad 4 Fast Food Restaurant	2,000 sq. ft.	Fast food restaurant with drive-thru lane.
	Pad 5 <u>Fast Food</u> or Office ¹ .	70,000 sq. ft.	Four level building that may be a public/institutional use.
	Warehouse/Industrial	55,000 sq. ft.	Industrial building with seven loading docks.

Notes:

1. Pad 5 may be developed as a 4,500 square-foot fast food restaurant use with a drive-thru lane instead of the office building.
Source: Studio Progetti. *A Project of Craig Realty Group. [The] Citadel.* November 21, 2018

7. CONSTRUCTION PHASING

The proposed areas will be constructed in phases. Other than the parking structures and other minor improvements, construction of the 10-acre Washington Boulevard/Telegraph Road site (Area 3) will likely commence first. Work on Area 3 will commence in 2019-2020 allowing individual businesses to start to open in 2020. Work on Area 1 will begin in 2020-2021. Finally, Area 2 (Phase 6) will be developed once Area 1 is open for business the two other Phases are open for business. The earliest all three components of the project will be open for business is by the year ~~2021~~ 2023.

8. DISCRETIONARY ACTIONS

As currently envisioned, the project will require the approval of the following discretionary actions:

- The entire planning area (Area 1 [existing Citadel], Area 2 [approximately 26 acres], and Area 3 [approximately 10 acres]) will be included in and subject to two statutory development agreements (DAs) pursuant to California Government Code Section 65863 through 65857, which will be approved by ordinance, requiring Planning Commission review and City Council approval. The first DA will apply to Area 1 and Area 2. The second DA will apply to Area 3. Both DAs will provide expedited site plan review and a master sign plan review.
- ~~Proposed~~ Zone Changes (ZC) will be required as part of the proposed project's implementation. ~~included in the DAs.~~ A proposed Zone Change from M-2 (*Heavy Industrial*) to C-2 (*Commercial*) will be required for two sites located in Area 1. These two sites will required a zone change from M-2 to C-2. Area 3 will require up to two zone changes. First, site for the proposed industrial building will need to be rezoned to M-2 to permit the proposed use. Furthermore, if an institutional/public/government facility is to be located on a portion of the joint venture site, the site must be zoned CPF (Commercial Public Facility Zone) to allow for the proposed use.
- The approval of the project and the certification of the Final EIR.

Other permits will be required as part of the proposed project's approval. These other permits will include, but may not be limited to, a Solid Waste Facility Permit, a Construction Stormwater Permit (State of California Water Resources Control Board), a General Industrial Stormwater Permit (State of California Water Resources Control Board), a Grading Permit (City of Commerce), a Building Permit (City of Commerce), and an Occupancy Permit (City of Commerce).

9. ENVIRONMENTAL IMPACT ANALYSIS

This EIR analyzes the potential environmental impacts that may result from the construction and subsequent operation of the proposed project. The analysis focuses on the proposed project's impacts for a number of issue areas including: aesthetics, air quality, cultural resources, greenhouse gas emissions, hazards and hazardous materials, hydrology, land use and planning, noise, population, public services, transportation, and utilities. The findings of the environmental analysis are summarized in Table 3.

**Table 3
Summary of Impacts**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
AESTHETIC IMPACTS		
<p>The existing development within the three areas total 190,243 square feet including 79,375 square feet in Area 1; 88,368 square feet in Area 2; and 22,500 square feet in Area 3. The existing vacant and undeveloped parcels were previously occupied by development that has since been demolished.</p> <p>Existing lighting in the Planning Area includes street lighting along Telegraph Road and Washington Boulevard, parking area lighting, and signage. Light is generated by free-standing digital signs located along the Citadel's southern property line. These are digital signs that produce vivid images that are visible from the I-5 freeway. The freestanding Commerce Casino sign is an additional source of light, though this sign is typically lit during the evening hours. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land uses or a driver's vision.</p> <p>The nearest light sensitive land uses include the Rosewood Park residential neighborhood. The nearest homes to the project site are located approximately <u>250 feet from Area 2, 860 feet from Area 3, and 1,280 feet from Area 1. These homes are generally located to the southwest of the project site on the south side of the Santa Ana Freeway.</u> The digital signage located within the Citadel complex; the Citadel's multi-level above-ground parking garage; the Double Tree hotel, and the Commerce Casino are all visible from the aforementioned residential neighborhood.</p>	<p>The greatest visual change associated with the proposed project's implementation involves the elimination of the existing older buildings and/or undeveloped properties and their replacement with a new building. The proposed new development within Area 1 through 3 will not obstruct views of the significant physiographic features (the San Gabriel Mountains, the Montebello Hills, and the Puente Hills) from the homes located within the Rosewood neighborhood. The views from the residences are presently restricted by the existing development within the area and the sound walls that extend along the south side of the Santa Ana Freeway.</p> <p>Overall, the proposed project's implementation will improve the overall visual and aesthetic quality of those properties located along the north side of the Telegraph Road corridor. The existing underutilized properties within Areas 2 and 3 consisting of vacant building and undeveloped properties will undergo development with new commercial buildings. The existing underutilized and dilapidated parcels within Area 2 and Area 3 will be improved with new development and landscaping.</p> <p>The greatest visual change associated with the proposed project's implementation involves the elimination of the existing older buildings and/or undeveloped properties and their replacement with a new building.</p> <p>The proposed new development within Area 1 through 3 will not obstruct views of the significant physiographic features (the San Gabriel Mountains, the Montebello Hills, and the Puente Hills) from the homes located within the Rosewood neighborhood. The views from the residences are presently restricted by the existing development within the area and the sound walls that extend along the south side of the Santa Ana Freeway.</p>	<p>The following mitigation is required to address potential negative impacts during demolition, grading, and construction phases.</p> <p>●<i>Mitigation Measure 1 (Scenic & Visual Impacts).</i> Prior to demolition activities, the project applicant shall erect a temporary construction barrier along public street frontages that adjoin the Areas 2 and 3 along Washington Boulevard and Telegraph Road. The barrier shall consist of material (wood, fabric, vinyl, etc.) that screens off-site views of the project site from the public right-of-way. The screen wall must also employ graffiti-resistant materials/properties. The barrier shall remain in place until building construction activities complete.</p> <p>To further reduce the potential for spill-over lighting and glare, the following mitigation will be required:</p> <p>●<i>Mitigation Measure 2 (Light & Glare Impacts).</i> The Applicant must also submit an exterior lighting plan for review and approval by the Public Works and Development Services Department prior to the issuance of building permits.</p> <p>●<i>Mitigation Measure No. 3 (Light & Glare Impacts).</i> The three new LED digital signs proposed for Area 2 must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver. The LED signs must be designed to freeze the display in one static position, display a full black screen, or turn off, in the event of a malfunction. The proposed displays (all levels) must be fully dimmable, and must be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day. Finally, the LED signs will be prohibited from displaying any red, blinking, or intermittent light likely to be mistaken for warning or danger signals.</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
AESTHETIC IMPACTS (CONTINUED)		
		<ul style="list-style-type: none"> • <i>Mitigation Measure No. 4 (Light & Glare Impacts).</i> All buildings, parking structures, and signage within the project areas must be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass. <p>The aforementioned mitigation will reduce the potential aesthetic impacts to levels that are less than significant.</p>
AIR QUALITY IMPACTS		
<p>Ambient air quality in the City may be characterized by readings taken from the monitoring station located in Receptor Area 5 (Station No. 84) in the City of Pico Rivera. Overall air quality has improved since 2000. Air quality within the SCAB has shown a steady improvement since monitoring was initiated and the ozone concentrations are no exception. The maximum one-hour ozone concentration in the SCAB measured in 2002 was the lowest concentration since monitoring began.</p> <p>Ozone concentrations still exceed both the State and Federal clean air standards in some areas of the SCAB though the urbanized area of Los Angeles County has not experienced an exceedance of either Federal or State ozone standards. The SCAQMD's air quality data indicates that during the past few years, the project area has exceeded the ozone, PM₁₀, and PM_{2.5} standards. Currently, the SCAB region is not in attainment of the ozone and PM_{2.5} standards. The AQMP provides the latest control strategies to achieve attainment as expeditiously as practicable.</p> <p>Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality. Sensitive receptors located near the project site include the following: the single-family residential neighborhood located along the south side of the I-5 freeway and Rosewood Park School, located 222 feet to the southwest and Rosewood Park, located 267 feet to the southwest. The park and the school are also located south of the I-5.</p>	<p>The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases). Therefore, the mass daily construction-related impacts associated with the proposed project would be significant.</p> <p>The Planning Area is located in a non-attainment area for ozone and particulates. Therefore, the project Applicant will be required to adhere to all SCAQMD regulations related to fugitive dust generation and other construction-related emissions. According to SCAQMD long-term (operational) emissions refer to those air quality impacts that would occur once the proposed project is operational. These impacts would continue over the operational life of the project. The long-term air quality impacts associated with the proposed project includes mobile emissions associated with vehicular traffic and stationary emissions. The projected long-term emissions would exceed SCAQMD thresholds for Reactive Organic Gases (ROG), NO_x, and PM₁₀. ROG is an organic gas that undergoes a photochemical reaction, thus, is reactive. ROG emissions are generated from the exhaust of mobile sources and these gases are precursors to ozone. PM₁₀ refers to small particulates (ten microns in size or smaller). Since the project will result in an exceedance in mobile sourced ROG, NO_x, and PM₁₀, mitigation measures have been provided to encourage the use of alternative forms of transportation.</p>	<p>The following mitigation would be required to further reduce air emissions.</p> <ul style="list-style-type: none"> • <i>Mitigation Measure 5 (Air Quality Impacts).</i> The project Applicant; retail, restaurant, and hotel management and office building management must provide incentives to encourage employees to utilize alternative transportation such as reduced rate transit passes, employee carpooling and vanpooling services, and preferential parking. • <i>Mitigation Measure 6 (Air Quality Impacts).</i> The building contractors must install electric vehicle (EV) charging stations in the parking garages. The number and location of the EV stations will be determined by the City in subsequent phases of design review and plan check. • <i>Mitigation Measure 7 (Air Quality Impacts).</i> Multiple shuttles powered by alternative fuels must be provided in the absence of the monorail. Once the monorail is complete and running, use of the shuttles may be discontinued. The use of the shuttles will discourage future patrons and guests from using their personal vehicle from travelling to different Areas of the project.

Table 3
Summary of Impacts (continued)

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
AIR QUALITY IMPACTS (CONTINUED)		
	<p><u>The proposed project within the three areas will allow for the construction to occur in phases. Work on Area 3 will commence in 2019-2020 with individual businesses starting to open in 2020. Work on Area 1 will begin in 2020-2021. Finally, Area 2 (Phase 6) will be developed once Area 1 is open for business with construction for Area 2 beginning in 2024.</u></p> <p><u>The total anticipated construction emissions for each of the three Area's future development were The CalEEMod V.2016.3.2 model represents a worst case with no mitigation used. The mitigation would involve regular watering of barren soils pursuant to Rule 403. The use of low VOC paints is also required by the SCAQMD which would further reduce ROG emissions.</u></p>	<ul style="list-style-type: none"> • <i>Mitigation Measure 8 (Air Quality Impacts).</i> Kiosks and directories depicting mass transit times and routes, the locations of bicycle racks, and the locations and times of the shuttles must be placed in visible locations within each project area. • <i>Mitigation Measure 9 (Air Quality Impacts/Environmental Justice).</i> The project Applicant must host a job fair with advertising prior to the project's opening to attract and hire local residents. In addition, preferential hiring must be given for Commerce residents. By hiring future employees from the City, the Applicant will reduce the number and distance of employee home-to-work trips. <p>The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases) even with the implementation of the required mitigation. The proposed project would also generate operational emissions that would still exceed the thresholds for ROG and NO_x and CO. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to air quality impacts.</p> <p><u>The SCAQMD recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR.</u></p> <ul style="list-style-type: none"> • <u>SCAQMD Mitigation Measure a. Require construction contractor(s) to use offroad diesel-powered construction equipment that meets or exceeds the CARB Tier 4 emissions standards.</u> • <u>SCAQMD Mitigation Measure b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction.</u>

Table 3
Summary of Impacts (continued)

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
AIR QUALITY IMPACTS (CONTINUED)		
		<ul style="list-style-type: none"> • <u>SCAQMD Mitigation Measure c.</u> Require that the proposed project's tenants maintain records of all trucks visiting the project and make these records available to the Lead Agency upon request. • <u>SCAQMD Mitigation Measure d.</u> Maintain vehicle and equipment maintenance records for the construction portion of the project. • <u>SCAQMD Mitigation Measure e.</u> Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes. • <u>SCAQMD Mitigation Measure f.</u> Encourage construction contractors to apply for SCAQMD "SOON" funds. <p>The SCAQMD staff recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce the operational air quality impacts.</p> <ul style="list-style-type: none"> • <u>SCAQMD Mitigation Measure g.</u> Require at least 5% of all vehicle parking spaces include electric vehicle charging stations, or require the project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. • <u>SCAQMD Mitigation Measure h.</u> Provide incentives for vendors and material delivery trucks that would be visiting the hotel and commercial uses to encourage the use of zero-emission or near-zero emission heavy-duty trucks. • <u>SCAQMD Mitigation Measure i.</u> Implement an anti-idling program. Vendors should be instructed to advise drivers that trucks and other equipment shall not be left idling for more than five minutes.

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
AIR QUALITY IMPACTS (CONTINUED)		
		<ul style="list-style-type: none"> • <i>SCAQMD Mitigation Measure j.</i> <u>Establish a policy to select and use vendors that use clean vehicles and trucks to service and deliver materials.</u> • <i>SCAQMD Mitigation Measure k.</i> <u>Maximize the planting of trees in landscaping and parking lots.</u> • <i>SCAQMD Mitigation Measure l.</i> <u>Require use of electric or alternatively fueled street-sweepers with HEPA filters.</u> • <i>SCAQMD Mitigation Measure m.</i> <u>Require use of electric lawn mowers and leaf blowers.</u>
CULTURAL RESOURCES IMPACTS		
<p>Prior to Spanish contact, approximately 5,000 Gabrieleño people lived in villages throughout the Los Angeles Basin. Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. Three early villages were located in the vicinity of Commerce: Apachianga, Isantcangna, and Tsungna.</p> <p>Indian gathering activities were most likely concentrated along the Los Angeles and Rio Hondo River channels. Another post contact Indian village site, referred to as La Jaboneria (the soap factory), was known to have existed on the east bank of the Rio Hondo River in an area located south of Telegraph Road.</p> <p>Commerce contains several known points of local and statewide historical and cultural interest. Three historic sites in Commerce are officially commemorated. The Uniroyal Tire Plant and the Pillsbury Mill are both listed on the State Register of Historical Places. A plaque marks the site of Vail Landing Field, where Western Airlines began its West Coast passenger and airmail service. Additional sites of interest include the Union Pacific (East Los Angeles) Train Station; the Mount Olive, the Russian Molokan Christian Spiritual Jumpers Lemente, and Mount Carmel ethnic cemeteries; and the 1942 Sleepy Lagoon Murder site. The latter site is noteworthy in that the murder led to a trial that culminated in the Zoot Suit Riots, focusing international attention on the early Mexican-American political movement.</p>	<p>Area 1 is presently occupied by two warehouses and surplus parking for the Citadel. Area 2 is currently developed, though the area contained more buildings and paved surfaces. The west side of Area 2 is currently occupied by Justman Packaging and Display, ancillary parking, and a vacant building. The east side of Area 2 is largely undeveloped and is covered over in dirt, sparse ruderal vegetation, and mounds of dirt and gravel. Area 3 was developed with multiple industrial buildings. These buildings have been demolished.</p> <p>The initial development and the subsequent improvements that have occurred over the years have resulted in extensive disturbance of the on-site soils. As a result, there is a limited likelihood that archaeological resources will be encountered during the site's redevelopment. Formal Native American consultation was provided in accordance with AB-52. The tribal representative of the Gabrielino-Kizh indicated that the project site is situated in an area of high archaeological significance. As part of future grading and excavation activities, the potential for discovering archaeological resources cannot be completely discounted. Mitigation has been identified to address any resources that may be uncovered during grading.</p>	<p>The following mitigation measure will be required to address potentially significant impacts.</p> <ul style="list-style-type: none"> • <i>Mitigation Measure 10 (Cultural Resources Impacts).</i> The project Applicant will be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area.

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
GREENHOUSE GAS IMPACTS		
<p>Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. The key GHG include the following:</p> <ul style="list-style-type: none"> • <i>Carbon dioxide (CO₂)</i> is an odorless, colorless gas, which has both natural and anthropogenic (arising from human activities) sources. • <i>Methane (CH₄)</i> is a flammable gas and is the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. • <i>Nitrous oxide (N₂O)</i>, also known as laughing gas, is produced naturally by microbial processes in soil and water. Man-made sources of nitrous oxide include agricultural sources, industrial processing, fossil fuel-fired power plants, and vehicle emissions. <p>In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and water vapor. Of all the GHGs, CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion.</p>	<p>Direct project-related greenhouse gas emissions include emissions from both area sources and mobile sources. The total project-related direct operational emissions would result in <u>31,141 MTCO₂E/year</u>.</p> <p>The project site's location in an urban area reduces the amount of vehicle miles travelled. The location of the nearest bus stops was also selected, further reducing the number of trips. In addition, the eclectic mix of uses offered by the project increases the project's diversity. Diversity refers to a collection of a variety of uses (residential, retail, office, public services, etc.) located in close proximity to each other.</p> <p>The proposed project will not conflict with the CARB's thirty-nine recommended actions in California's AB 32 Climate Change Scoping Plan. The project would incorporate sustainable practices which include water, energy, solid waste, land use, and transportation efficiency measures. The proposed project would not be incompatible in conflict with the remaining CARB Programs.</p>	<p>The GHG emissions will exceed the SCAQMD significance thresholds even with the implementation of the CARB requirements. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to GHG emissions impacts. <u>A number of comments on the Draft EIR indicated that the Final EIR should include mitigation measures that would be effective at reducing potential GHG emissions.</u></p> <ul style="list-style-type: none"> • <u>GHG Mitigation Measure a. The Citadel owners shall provide incentives to encourage employees to utilize alternative transportation such as reduced public transportation fares, employee carpooling and vanpooling services, and preferential parking for carpool and vanpool vehicles.</u> • <u>GHG Mitigation Measure b. The Gold Line extension will allow Citadel patrons to utilize the transit to travel to the project, thus reducing vehicle trips.</u> • <u>GHG Mitigation Measure c. If the option that involves the extension of the Gold Line through Commerce is pursued, the project Applicant shall provide a shuttle service to transport Citadel patrons to the Gold Line station from the project.</u> • <u>GHG Mitigation Measure d. The building contractors shall install electric vehicle charging stations in the parking areas.</u> • <u>GHG Mitigation Measure e. The Citadel owners must facilitate handicapped access onto the monorail.</u> • <u>GHG Mitigation Measure f. The Citadel owners must schedule a meeting with representatives of the Los LA Metro and the City of Commerce to improve the bus stops that serve the project area.</u>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
HAZARDS & HAZARDOUS MATERIALS IMPACTS		
<p>Groundwater monitoring for volatile organic compounds (VOCs) in groundwater was being conducted to evaluate migration from the off-site former Pacific Tubing Company (PATCO) property. There are currently ten groundwater monitoring wells on the former PATCO property, located northwest of the subject property and now a part of the Citadel shopping center parking lot. A Voluntary Cleanup Agreement (VCA) was executed between the DTSC and PATCO and based on documentation reviewed; approximately 11,000 tons of PCE solvent impacted soils were removed from the former VDA area in 2001 during the facility demolition. The area has subsequently been covered with pavement to prevent stormwater percolation through the former VDA. However, the volume of PCE was sufficient to migrate downward to the underlying groundwater table at approximately 88 feet below the ground surface.</p> <p>The majority of the listings for Area 2 appear related to prior site operations. No current on-site USTs are reported, with the exception of one former UST reportedly abandoned in place by filling with slurry located at 5931/5933 Telegraph Road. Based on the lack of current violations and/or listing in other databases indicating a release, these former and current owner and tenant listings are not expected to have created an environmental concern at the subject property. Potential vapor intrusion concerns were identified from off-site facilities.</p> <p>A Phase I Environmental Site Assessment was also performed for Area 3 and, based on the findings of the Phase I Environmental Site Assessment, potential or possible environmental conditions currently associated with the project site were identified. Along the northern site boundary, pole-mounted transformers were observed. Given the pre-1979 date of development of the subject site, the presence of polychlorinated biphenyls (PCB)-containing fluids in the transformer is suspected. Area 3 is not located on the DTSC Hazardous Waste and Substances database.</p> <p>The EPA's multi-system search was consulted to determine whether the project site is identified on any Federal Brownfield list; Federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List; Federal Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Facilities List; and/or Federal RCRA Generators List.</p>	<p>Construction projects, such as the one that would be undertaken for the proposed project, would require certain hazardous materials (fuels, adhesives, solvents), that, if improperly used and inadvertently released, could result in a temporary hazard to workers, the public, or the environment. However, the hazardous materials typically used on a construction site are transported onto the site packaged in consumer quantities and used in accordance with manufacturer recommendations. The overall quantities of the majority of these materials at any one time would not result in large bulk amounts that, if spilled, could cause a significant soil or groundwater contamination issue. However, the need to refuel heavy equipment at the site can require the storage of above ground storage tanks or refueling vehicles.</p> <p>The use of construction best management practices (BMPs) typically implemented as part of construction activities are required by the Storm Water Pollution Prevention Plan (discussed further in Section 3.7, Hydrology and Water Quality). These BMPs would minimize the potential adverse effects to groundwater and soils and could include the following: adherence to the manufacturer's recommendations on use, storage, and disposal of chemical products used in construction; avoiding the over-topping of the construction equipment's fuel tanks; undertaking routine maintenance of construction equipment; and, the properly disposing of discarded chemical and fuel containers.</p> <p>As indicated previously, because of the age of the on-site structures within Area 2 and Area 3, there is the potential for exposure to hazardous components in building materials and equipment, and potentially contaminated soil, which if disrupted can become a hazard. For this reason, demolition contractors must properly remove, handle, and dispose of these hazardous materials.</p>	<p>Implementation of the following mitigation measures will reduce the proposed project's emission of hazardous materials.</p> <ul style="list-style-type: none"> • <i>Mitigation Measure 11 (Hazards & Hazardous Materials).</i> The preparation of a soil and demolition management plan (SMP) will be required. Grading and development should plan for removal of USTs, other subsurface features not removed during demolition, and potential management of visually impacted soil. Observation of grading and demolition operations under the SMP must be conducted. • <i>Mitigation Measure 12 (Hazards & Hazardous Materials).</i> The railroad spur line is likely impacted by petroleum hydrocarbons, arsenic, lead, and polynuclear aromatic hydrocarbons. When the line is removed, and if the soil is excavated and moved from the property, the soil will likely require sampling and special handling. • <i>Mitigation Measure 13 (Hazards & Hazardous Materials).</i> A vapor barrier must be installed at 2240 Gaspar Avenue should a building be constructed within the property. • <i>Mitigation Measure 14 (Hazards & Hazardous Materials).</i> An Operations and Maintenance (O&M) Program must be implemented in order to safely manage the suspect ACMs and LBP located in the remaining buildings. <p>The analysis indicated the proposed project would not have the potential for creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
HAZARDS & HAZARDOUS MATERIALS IMPACTS (CONTINUED)		
<p>Two former tenants, Boyd Furniture and California Furniture Shops, are included in the RCRA database, while Boyd Furniture is also listed in the Toxic Release Inventory database. Boyd Furniture is listed in the RCRA database as a small quantity generator, although no further action is required for the portion of the project site that was occupied by the aforementioned use. The property that was occupied by Boyd Furniture is also listed in the Toxic Release Inventory (TRI) database. There were seven EPA regulated chemicals that were used in routine operations that took place between 1989 and 1998. The entire project area has been developed and there is a potential for certain hazardous materials being encountered during demolition, grading, and excavation activities. These materials included asbestos containing materials (ACMs), lead containing materials (LCMs), and polychlorinated biphenyls (PCBs). Each of the aforementioned hazardous materials and their on-site potential are discussed below:</p> <ul style="list-style-type: none"> • <i>Asbestos</i> is a naturally occurring mineral fiber that was historically utilized in a multitude of building material products. Building materials such as floor or ceiling tiles, siding, roofing, transite panels (floor sheeting, floor, or roof mastics), are also considered to be potential sources of ACMs. • <i>Lead and lead compounds</i> may be found in many types of paint. Lead based paints were commonly used on buildings built prior to 1970's. No buildings are located on the development site and, as a result, the potential for encountering lead containing compounds are minimal. • <i>Polychlorinated biphenyls (PCBs)</i> were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. 	<p>Typically, commercial/retail land uses do not generate, store, or dispose of significant quantities of hazardous materials. Such uses also typically do not normally involve dangerous activities that could expose persons onsite or in the surrounding areas to large quantities of hazardous materials.</p> <p>While the specific tenants are not known, general landscaping and maintenance will include the use of pest control, herbicide, and janitorial products such as commercial cleaners. Small quantities of hazardous materials would be used on-site, including cleaning solvents (such as degreasers, paint thinners, and aerosol propellants), paints and oil-based, acids and bases (such as many cleaners), disinfectants, and fertilizers. These substances would be stored in secure areas and would comply with all applicable storage, handling, usage, and disposal requirements (e.g., California Health and Safety Code Section 25531, et seq., governing accidental release prevention).</p> <p>The potential risks posed by the use and storage of these hazardous materials are primarily limited to the immediate vicinity of the materials. The transport of these materials would be performed by commercial vendors who would be required to comply with various federal and state laws regarding hazardous materials transportation (e.g., Federal Motor Carrier Safety Administration Regulations and 49 Code of Federal Regulations Parts 100-185).</p>	
HYDROLOGY & WATER QUALITY IMPACTS		
<p>The existing site consists of ±36.5 acres of developed and vacant land that generally drains from the northwest toward the southeast direction. The site is 55% impervious and approximately 60% of the site is developed with light industrial buildings and associated parking lots. The site runoff travels via surface flow to Gaspar Avenue, Travers Avenue, and Telegraph Road.</p>	<p>The project drains into the Los Angeles River which is listed on the State Water Board planned a list of impaired water bodies and in the Tier 3 Pollutants of Concern as contained in the LID Manual. The Los Angeles River is listed for ammonia, high coliform count, lead, nutrients (algae) odors, oil, and scum/foam unnatural. The Tier 3 POCs are pH, E. coli bacteria, chloride, total nitrogen, sulfate, TDS, turbidity, aluminum, cyanide, copper, mercury, and selenium.</p>	<p>The analysis indicated the proposed project's potential for violating any water quality standards or waste discharge requirements. Grading related activities are not anticipated to deplete groundwater supplies from any underlying aquifer or interfere with any groundwater recharge activities. The footings that will be installed to accommodate the building will not extend more than ten feet below the surface.</p>

Table 3
Summary of Impacts (continued)

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
HYDROLOGY & WATER QUALITY IMPACTS (CONTINUED)		
<p>There is an existing Los Angeles County Flood Control District facility Project No. 2501, Unit 3, Line C, which varies in size from 51-inch to 60-inch in diameter, which is a reinforced concrete pipe (RCP) storm drain under Telegraph Road and fronting along the Planning Area's south side. There is also a 24-inch RCP storm drain under Travers Avenue that confluent with the 51-inch storm drain in Telegraph Road.</p> <p>The site is within the Los Angeles River Watershed and the storm runoffs are conveyed to the Los Angeles River by the aforementioned County of Los Angeles Flood Control storm drain. The surface runoff from the subject site ultimately flows into catch basins that drain into the County storm drain. The site currently does not support any existing on-site detention facilities or any water quality treatment systems.</p> <p>Area 3 is currently partially developed with an existing retail building and paved parking lot area. The majority of the existing site is vacant with some stockpiled materials on it. Area 3 is 10.61 acres and is 37.0% impervious. In the existing condition, storm water flows southwesterly towards Telegraph Road and is picked up in curb opening catch basins that connect to the eight feet by nine feet RCB (LACDWP Plan PD 031289) in Telegraph Road. The RCB storm drain ultimately discharges into Rio Hondo Channel, the Los Angeles River and Pacific Ocean.</p>	<p>Anticipated pollutants associated with commercial developments, as identified in Table 7-3 of the LID Manual, are suspended solids, total phosphorous, total nitrogen, total copper, total lead, and total zinc. Other common pollutants of concern include trash/debris and oil/grease from the parking areas.</p> <p>The treatment flow rate will be treated through the biotreatment systems just described. Biotreatment using the sand/compost mix has been found to have high to medium removal rates for nitrogen, chromium, lead and also is effective at removal of sediments, oil and grease, phosphorus, metals, organic compounds, trash and debris, and pathogens (bacteria and viruses). The use of biofiltration basins will facilitate proper treatment and discharge of storm water runoff by using plants to capture and biologically degrade pollutants carried by storm water runoff. Biofiltration/retention areas also reduce the volume of storm water runoff discharged into the local storm drains. These facilities normally consist of a grass buffer strip, sand bed, ponding area, organic layer or mulch layer, planting soil, and plants. The runoff's velocity is reduced by passing over or through a sand bed and is subsequently distributed evenly along a ponding area.</p> <p>The infiltration rate for the project site is 0.2 inches/hour which is less than the minimum required infiltration rate of 0.3 inches/hour according to the LID manual, and is therefore not a viable treatment method for this site.</p> <p>The project will not create any hydrologic conditions of concern, as all storm water runoff from the site will be conveyed to proposed underground detention basins that will only restrict flow rate discharges to the same or less the Allowable Q discharge rate designated by the Los Angeles County Department of Public Works, Design Division, Hydraulic Analysis Unit. Outflow discharges from the detention basins will enter the existing concrete-lined storm drain in Telegraph Road and Hoefner Avenue. Therefore, hydromodification is not an issue of concern for this site.</p>	<p>In addition, the proposed project will be connected to the City's water lines and is not anticipated to deplete groundwater supplies through the consumption of the water. The project will be required to install Xeriscape landscaping and water efficient appliances to reduce the burden placed on the City's water resources. Future water consumption will be limited to that used for landscaping, restroom use, and routine maintenance and cleaning. The project Applicant will be required to adhere to the applicable BMPs for the construction site. Adherence to the required BMPs will restrict the discharge of contaminated runoff into the local storm drain system. As a result, the impacts are anticipated to be less than significant.</p> <p>The proposed project will not result in the introduction of contaminated runoff into the local storm drains with the adherence to the construction and operational BMPs identified in the LID report. The impacts will be less than significant with the implementation of the required BMPs identified in the LID report.</p> <p>The analysis indicated the proposed project would not result in significant impacts to any adopted air quality plan. As a result, the proposed project's potential for substantially depleting groundwater supplies or interfering substantially with groundwater recharge in such a way that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
LAND USE & PLANNING IMPACTS		
<p>The Citadel complex as a whole contains a variety of commercial retail, office, hotel, and entertainment-related uses. The Citadel complex, which contains both retail and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located in between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3).</p> <p>The west side of Area 2 is currently occupied by Justman Packaging and Display, ancillary parking, and a vacant building. The east side of Area 2 is largely undeveloped and is covered over in dirt, sparse ruderal vegetation, and mounds of dirt and gravel. An abandoned warehouse is located within the southwest corner of east side of Area 2. Area 3 is located at the northwest corner of the Telegraph Road/Washington Boulevard intersection. A majority of this site is undeveloped, though a building occupied by Furniture Clearance Warehouse is located at the site's southwest corner. The portions of the site that are currently undeveloped are covered over in dirt, sparse ruderal vegetation, gravel, and remnants of concrete surfaces. Commercial uses including a Costco, McDonalds, and various industrial/warehouse buildings occupy the parcels located east of Washington Boulevard and Telegraph Road.</p> <p>The existing development within the three project areas (Area 1, Area 2, and Area 3) total 190,243 square feet including 79,375 square feet in Area 1; 88,368 square feet in Area 2; and 22,500 square feet in Area 3. The existing vacant and undeveloped parcels were previously occupied by development that has since been demolished.</p> <p>The existing Citadel Outlet complex contains a variety of commercial retail, office, and hotel uses. The main Citadel complex, which contains both retail and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3).</p>	<p>Portions of the Planning Area will require a number of Zone Changes to accommodate the proposed uses. The first set of zone changes, from M-2 (<i>Heavy Industrial</i>) to C-2 (<i>Commercial</i>), will be required for two sites located in Area 1. Area 3 will also require up to two zone changes.</p> <p>The site for the proposed industrial building will need to be rezoned to M-2 (Heavy Industrial) to C-2 (Commercial) to permit the proposed use industrial building. In addition, if an institutional/public/government facility is ultimately located within Area 3, development site must be zoned CPF (Commercial Public Facility Zone) to allow for the proposed use.</p> <p>The proposed <i>new</i> development within the three areas (Area 1, Area 2, and Area 3) will have a total floor area of 1,007,202 square feet. The new development will consist of approximately 237,662 square feet of retail uses; 358,000 square feet of hotel uses totaling 770 rooms; 270,000 square feet of theater, entertainment, and recreation uses; 16,540 square feet of food serving uses; 70,000 square feet of office uses; and 55,000 square feet of industrial uses. This breakdown in land uses assumes that Pad 5 in Area 3 will be developed as an office use instead of a fast food restaurant.</p> <p>The new development overall is classified as an infill development, which means that the project will be constructed within urban sites that were formerly developed. This recycling of obsolete sites and uses is crucial in reducing greenhouse gas emissions by preventing urban sprawl into the eastern (desert) portions of Southern California. SCAG has been actively promoting infill development through the adoption of the last two RTP/SCS'. The project is in line with SCAG's goal of promoting urban infill development.</p>	<p>The analysis indicated the proposed project would not result in a potential conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
NOISE IMPACTS		
<p>The existing noise environment in the area is dominated by motor vehicle traffic traveling on local roads and the I-5 freeway. To characterize existing noise levels in the project area, noise emitted by peak-hour traffic traveling on streets in the City of Commerce was modeled using the Federal Highway Administration Traffic Noise Prediction Model4 and traffic volume data provided in the Citadel Expansion Traffic Impact Analysis.</p> <p>Noise levels (in CNEL) were expressed using noise contours representing a line along which the ambient traffic noise levels were equal (the use of noise contours in this fashion are similar to how weather maps depict common temperatures or topographic maps show areas of equal elevation). For purposes of this analysis, noise level contours for the 70 CNEL, 65, CNEL, and 60 CNEL were calculated.</p> <p>The noise model computed the distance of the specific noise contour from the roadway centerline. For example, in Table 3-11 the 65 CNEL contour for the Telegraph Road corridor was found to be 110 feet on both sides of the roadway. This figure indicated that all of the properties and land between the contour line and the roadway centerline would be exposed to noise levels of at least 65 CNEL. However, the actual distances to these contours could be considerably less than predicted where intervening structures break the line-of-sight to the roadway.</p> <p><u>The project area is located within an urbanized setting and the ambient noise characteristics reflect the surrounding urban environment. The predominant source of noise in the area is related to traffic on the I-5 freeway. An Extech Digital Sound Meter was used to conduct the noise measurements. The meter was performed using a slow response setting, with an "A" weighting. The noise measurement location approximately 15 feet from the north curb of along the Area 2 frontage. The median ambient exterior noise level (L₅₀) was 72.1 dBA at the measurement location. The L₅₀ represents the noise level that is exceeded 50% of the time (half the time the noise level exceeds this level and half the time the noise level is less than this level). The average ambient noise level was 72.0 dBA.</u></p>	<p>The proposed project will generate additional vehicle traffic to the local roadway network. These additional vehicle trips will contribute to an increase in roadway noise in the project vicinity. In addition, the proposed project will generate noise from stationary sources such as roof mounted air-conditioning units and truck delivery activities.</p> <p>It typically requires a <i>doubling</i> of traffic volumes to result in an increase in the ambient noise levels of between 3.0 to 5.0 dBA. The 3.0 to 5.0 dBA figures are considered to be the limit where changes in the noise levels may be perceived by persons with normal hearing.</p> <p>The noise levels for the study segments would not increase to a level that would be perceptible to persons with average hearing (3.0 to 5.0 dBA). According to Commerce General Plan Policy 7.8.1.1, which establishes maximum acceptable noise limits for different land uses, the acceptable noise limit in the vicinity of the project site is 70 dBA. The future projected traffic noise levels would not exceed 70 dBA along the roadways where significant project-generated noise increases would occur. Therefore, the project's traffic increases would result in less than significant impacts related to noise.</p> <p>Construction activities could involve excavation, grading, demolition, drilling, trenching, earth movement, vehicle travel to and from the project site, and possibly pile driving. Construction-related material haul trips would raise ambient noise levels along haul routes depending on the number of haul trips made and types of vehicles used.</p> <p><u>The interior areas are insulated for climate control which would also effectively attenuate construction noise. Construction activities associated with the project would be temporary in nature and related noise impacts would be short term. Also, since construction activities would not substantially increase ambient noise levels at noise-sensitive locations, construction noise would not result in significant impacts to sensitive receptors.</u></p>	<p>The proposed project will generate additional vehicle traffic to the local roadway network. These additional vehicle trips will contribute to an increase in roadway noise in the project vicinity. In addition, the proposed project will generate noise from stationary sources such as roof mounted air-conditioning units and truck delivery activities.</p> <p>The 3.0 to 5.0 dBA figures are considered to be the limit where changes in the noise levels may be perceived by persons with normal hearing. Construction activities associated with the project would be temporary in nature and related noise impacts would be short term. Also, since construction activities would not substantially increase ambient noise levels at noise-sensitive locations, construction noise would not result in significant impacts to sensitive receptors.</p> <p>The analysis indicated the proposed project would not result in a potential significant impact. As a result, no mitigation is required.</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
NOISE IMPACTS (CONTINUED)		
<p><u>The high levels of ambient noise were due to the freeway traffic on the I-5 Freeway. In addition, the traffic on Telegraph Road was a secondary source of noise.</u></p> <p>As indicated previously, the existing noise environment in the area is dominated by motor vehicle traffic traveling on local roads and the I-5 Freeway. The nearest sensitive receptors are located to the south of the I-5 Freeway. The outside pedestrian and parking areas would also be impacted by construction noise.</p>		
POPULATION & HOUSING IMPACTS		
<p>There are no housing units or persons residing within the Planning Area. Virtually all of the land area within Commerce's corporate boundaries was developed prior to the city's incorporation in 1960. Over the years, the lack of available land has presented unique challenges to the city in its efforts to provide housing for its growing population.</p> <p><u>According to the California State Department of Finance as of January 1, 2019, the City's population was 13,201 persons and the number of housing units was 3,473 units. There are no housing units or persons residing within the three project areas.</u></p>	<p>The proposed project will also conform to Consistency Criteria 2 since it will not significantly affect any regional population, housing, and employment projections prepared for the City of Commerce. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Comprehensive Plan (RCP) prepared by the Southern California Association of Governments (SCAG) are considered consistent with the AQMP growth projections, since the RCP forms the basis of the land use and transportation control portions of the AQMP.</p> <p>According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Commerce is projected to add a total of 4,500 jobs through the year 2040. A total of 1,750 new jobs will be created by the proposed project, assuming employment generation rates derived from the Institute of Transportation Engineers. The number of jobs that will be created is well within SCAG's employment projections for the City. In addition, the project may aid in reducing citywide unemployment.</p> <p><u>The current unemployment rate for the City of Commerce is 5.8% which translates into 300 local residents actively seeking work. Within these five adjacent communities, there is a total of 6,800 persons actively seeking work.</u></p>	<p>No mitigation is required per the analysis. The analysis indicated the proposed project would not result in a substantial growth in the population within an area, either directly or indirectly related to a project.</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
PUBLIC SERVICES IMPACTS		
<p>Fire prevention services are provided by the Los Angeles County Fire Department (LACFD). The services offered by the LACFD include firefighting, paramedic and first aid treatment, hazardous material response, and emergency preparedness coordination. The LACFD is staffed by 4,713 sworn and non-sworn personnel. Of this figure, 2,904 are sworn firefighters or paramedics, with the remaining 1,809 personnel consisting of non-sworn staff. There are three LACFD stations located within the City: <i>Station 22</i> (928 South Gerhart Street); <i>Station 27</i> (6031 Rickenbacker Road); and <i>Station 50</i> (2327 South Saybrook Avenue). Station 50 is the first response station to the project site is Station 50, located 0.31 miles to the north of the Planning Area.</p> <p>The average emergency response time for calls for service in the City averages around just over five minutes (City of Commerce General Plan has adopted a response time objective of five minutes or less for all in-city emergency incidents). Ambulance transport is provided by Care Ambulance Service.</p> <p>The City also utilizes the services of the Los Angeles County Sheriff's Department. The City has maintained this contract since incorporation. The nearest first response station to the project site is the Los Angeles County Sheriff's Station located 2.06 miles to the northwest at 5019 East 3rd Street within the City of Los Angeles.</p>	<p>The LACFD review the development plan and indicated that the proposed project is located in an area with adequate fire protection coverage and stated that the project would be expected to generate a negligible increase in the number of calls for service. The LACFD also indicated that the proposed development would be required to comply with the standard requirements of the California Fire Code, including provisions pertaining to vehicular access, minimum fire flow standards, fire hydrant spacing, fire sprinkler systems, and related items. Compliance with these standard Fire Code requirements would be determined at the plan check submittal, which is in accordance with the City's standard practice.</p> <p>The proposed project would not create a need for new or expanded fire protection facilities that result in physical impacts on the environment. Impacts would be less than significant.</p> <p>The LACSD provided comments to the City of Commerce indicating that the proposed project would be expected to result in a nominal increase in time handling petty theft (shoplifting) incidents and recommended that the operators expand the existing on-site number of loss prevention personnel. As a conditional of approval, the operators would provide security measures including loss prevention personnel and video surveillance to deter or prevent criminal activity (such as petty theft), consistent with the LACSD.</p>	<p>The proposed project would not create a need for new or expanded fire department services or facilities that result in physical impacts on the environment. As a result, the potential impacts would be less than significant.</p> <p>In addition, the proposed project would not create a need for new or expanded law enforcement facilities or services that result in physical impacts on the environment. As a result, the potential impacts would be less than significant.</p>
TRANSPORTATION & CIRCULATION IMPACTS		
<p>Primary regional access to the study area is provided by Interstate 5 (I-5) Freeway, which is directly south of the Planning Area, and Interstate 710 (I-710), which is west of the Planning Area. Immediately adjacent to the site, I-5 extends in a northwest/southeast direction. I-710 is an eight-lane freeway that runs north-south from Long Beach to Alhambra. Descriptions of key roadways serving the study area are provided below:</p> <ul style="list-style-type: none"> • <i>Telegraph Road</i> provides two to three lanes in each direction adjacent to the Planning Area. • <i>Hoefner Avenue</i> provides one lane in each direction. 	<p>Area 1 and Area 2 are expected to generate a net increase of 12,070 weekday daily trips, including a net increase of 342 weekday morning peak hour trips (221 inbound, 121 outbound), 1,294 weekday afternoon peak hour trips (634 inbound, 660 outbound), and 16,403 Saturday daily trips, including 1,932 Saturday midday peak hour trips (1,012 inbound, 920 outbound).</p>	<p>The mitigation measures described in this section relate to the significant traffic impacts previously described with respect to the Existing with Project Conditions (Year 2018), Future with Project Conditions (Year 2025), and Future with Truck Traffic with Project Conditions (Year 2025) analyses. As described, under <i>Existing with Project Conditions</i>, before mitigation, the project is expected to result in significant traffic impacts at the following ten signalized intersections:</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
TRANSPORTATION & CIRCULATION IMPACTS (CONTINUED)		
<ul style="list-style-type: none"> • <i>Gaspar Avenue</i> provides one lane in each direction. • <i>Camfield Avenue</i> provides one lane in each direction. • <i>Washington Boulevard</i> is located south of the Planning Area, with two to three lanes in each direction and left-turn pockets at signalized intersections. • <i>Bandini Boulevard</i> is an east-west roadway located south of the Planning Area, with two lanes in each direction, left-turn pockets at signalized intersections and a two-way left-turn median. • <i>Flotilla Street</i> is an east-west roadway located north of the Planning Area, with one lane in each direction. • <i>Ferguson Drive</i> is an east-west roadway located north of the Planning Area, with two lanes in each direction. • <i>Olympic Boulevard</i> is an east-west roadway located north of the Planning Area, with two lanes in each direction. • <i>Whittier Boulevard</i> is an east-west roadway located north of the Planning Area, with two lanes in each direction. • <i>Smithway Street</i> provides one lane in each direction and a center turn lane. • <i>Saybrook Avenue</i> is located east of the Planning Area, with one lane in each direction. • <i>Garfield Avenue</i> is a north-south roadway located east of the Planning Area (Area 3) with two lanes in each direction. • <i>Tubeway Avenue</i> has one lane in each direction. • <i>Atlantic Boulevard</i> is located west of the Planning Area, with two lanes in each direction, left-turn pockets at signalized intersections, and a two-way left-turn median. • <i>Triggs Street</i> is a two-lane street adjacent to the I-5 south ramps. • <i>Eastern Avenue</i> is a north-south roadway located west of the Planning Area with two lanes in each direction. <p>The traffic study indicated that 19 of the 23 signalized intersections currently operate at LOS D or better during the analyzed peak hours under Existing Conditions. The remaining four signalized intersections currently operate at LOS E during the afternoon peak hour. Four unsignalized intersections currently operate at LOS C or better during the analyzed peak hours. The remaining two unsignalized intersections currently operate at LOS E or F during at least one of the analyzed peak hours.</p>	<p>The Area 3 portion of the Planning Area is expected to generate a net increase of 3,226 weekday daily trips, including a net increase of 284 weekday morning peak hour trips (189 inbound, 95 outbound), 270 weekday afternoon peak hour trips (105 inbound, 165 outbound), and a net increase of 3,216 Saturday daily trips, including 329 Saturday midday peak hour trips (172 inbound, 157 outbound).</p> <p>Under <i>Existing Conditions (Year 2018)</i>, 15 of the 23 study intersections is anticipated to operate at LOS D or better during the analyzed peak hours under Existing with Project Conditions. Four of the six unsignalized intersections operate at LOS C or better under Existing with Project Conditions.</p> <p>Under <i>Existing with Project Conditions (Year 2018)</i>, using the City criteria for determining the significance of a traffic impact, the project would have a significant impact at 15 of the 23 signalized study intersections during the analyzed peak hours. Of the 23 signalized intersections, the ten signalized intersections are anticipated to result in a significant impact. Four of the six unsignalized intersections operate at LOS C or better under Existing with Project Conditions. The intersection of Hoefner Avenue and Telegraph Road (Intersection #13) meets the minimum peak hour traffic volume threshold of Warrant 3, and the intersection of I-5 Southbound Ramps and Bandini Boulevard (Intersection #28) does not satisfy the signal warrant under Existing with Project Conditions.</p> <p>Under <i>Future with Project Conditions (Year 2025)</i>, using the City criteria for determining the significance of a traffic impact, 9 of the 23 signalized study intersections are anticipated to operate at LOS D or better. Thirteen signalized intersections are anticipated to result in a significant impact during at least one of the analyzed peak hours.</p> <p>Should these improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant.</p>	<p>2. Atlantic Boulevard & Olympic Boulevard</p> <p>4. Atlantic Boulevard/Triggs Street & Telegraph Road/Ferguson Drive</p> <p>11. Atlantic Boulevard & Telegraph Road</p> <p>12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road</p> <p>14. Citadel Drive & Telegraph Road</p> <p>17. I-5 Ramps/Commerce Casino & Telegraph Road</p> <p>18. Washington Boulevard & Telegraph Road</p> <p>21. Eastern Avenue & Atlantic Boulevard</p> <p>25. I-5 Southbound Ramps & Washington Boulevard</p> <p>27. Garfield Avenue & Bandini Boulevard.</p> <p>The mitigation program for the project includes the following major components:</p> <ul style="list-style-type: none"> • Implementation of a <i>Transportation Demand Management (TDM)</i> program for the project site to promote peak period trip reduction. • <i>Transportation Systems Management (TSM)</i> improvements, including signal system coordination, signal controller updates and installation of closed circuit television (CCTV) at key intersections within the study area. • <i>Specific intersection improvements</i>, including physical mitigations and signal phasing enhancements. <p>The components of the project's mitigation program described in the previous section would result in peak hour trip reductions from the implementation of the TDM program, as well as operational improvements as a result of the TSM improvements and specific intersection improvements.</p>

**Table 3
Summary of Impacts (continued)**

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
TRANSPORTATION & CIRCULATION IMPACTS (CONTINUED)		
		<p>If the specific physical intersection improvements are determined to be infeasible during the design process, the following three study intersections would be significantly impacted after mitigation:</p> <p>11. Atlantic Boulevard & Telegraph Road; 12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road; and, 17. I-5 Ramps/Commerce Casino & Telegraph Road.</p> <p>When considering <i>Future with Truck Traffic with Project</i> if the specific intersection improvements are determined to be infeasible during the design process, the following four study intersections would remain significantly impacted after mitigation:</p> <p>11. Atlantic Boulevard & Telegraph Road; 12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road; 17. I-5 Ramps/Commerce Casino & Telegraph Road; and, 18. Washington Boulevard & Telegraph Road.</p>
UTILITY IMPACTS		
<p>The California Water Service Company (Cal Water) provides potable water service to 90 percent of the City of Commerce, including the Planning Area. Cal Water's <i>Allowed Pumping Allocation</i> of 11,774 acre-feet/year is set at 80 percent of the adjudicated right, which is based on the safe yield of the groundwater basin. This is normally referred to as the Allowed Pumping Allocation (APA).</p> <p>Los Angeles County Sanitation District (LACSD) No. 2 provides sewer collection and treatment to the City of Commerce. The City of Commerce and LACSD No. 2 discharges effluent to the Los Coyotes Water Reclamation Plant in Cerritos. The Los Coyotes Water Reclamation Plant provides primary, secondary, and tertiary treatment capacity for 37 million gallons of wastewater per day.</p>	<p>There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The proposed new development within the planning area is projected to generate 133,018 gallons of effluent on a daily basis.</p> <p>The proposed project would result in the installation of new water laterals that would connect to the existing water lines within adjacent roadways. The various project elements will be required to install water efficient fixtures. In addition, the Applicant must plant drought tolerant landscaping. The proposed new development within the Planning Area is projected to consume 165,434 gallons of water on a daily basis.</p>	<p>The proposed development will be required to comply with the City's Low Impact Development (LID) requirements.</p> <p>The analysis determined the proposed project would not result in any significant adverse impacts.</p>

Table 3
Summary of Impacts (continued)

Environmental Setting	Environmental Impacts	Mitigation Measures and Significant Impacts
UTILITY IMPACTS (CONTINUED)		
<p>The plant treats an average of 32 million gallons of effluent per day. Of this total effluent, more than 5 million gallons per day of the reclaimed water is reused (reused water is used for landscape irrigation of schools, golf courses, parks, nurseries, and greenbelts, and industrial use at local companies for carpet dyeing and concrete mixing. The remainder of the effluent is discharged to the San Gabriel River.</p> <p>The Sanitation Districts operate a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. Trash collection for commercial land uses is provided by the other private haulers for disposal into the Commerce Incinerator and into area landfills. Waste may also be transferred to either the Mesquite Regional Landfill in Imperial County or to the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF). The Los Angeles County Sanitation District 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). Cal-Met provides franchise trash collection service to business customers in the City of Commerce. Three of the facilities are landfills; the other is a refuse-to-energy facility (i.e., incinerator).</p>	<p>The proposed retail development, like all other development in Commerce, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated. The proposed new development within the Planning Area is projected to generate 42,939 pounds of solid waste on a daily basis.</p>	



10. OTHER CEQA ISSUES

GROWTH-INDUCING IMPACTS

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area, such as utilities, improved roadways, and expanded public services. Those variables that typically contribute to growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The Planning Area is developed and located within an urban area. Portions of Area 2 and 3 are presently undeveloped though they were previously developed. The proposed project will be an infill project.
- *The extension of roadways and other transportation facilities.* The only roadway extension will be Gaspar Avenue which will serve the proposed project.
- *The extension of infrastructure and other improvements.* Any new infrastructure lines will serve the proposed project only.
- *Major off-site public projects (treatment plants, etc.).* No major public improvements will be required to accommodate the proposed project.
- *The removal of housing requiring replacement housing elsewhere.* No housing units will be removed as part of the proposed project's implementation.
- *Additional population growth leading to increased demand for goods and services.* The proposed project will involve any residential development. Any potential population growth will be indirect and will be related to employment generation.
- *Short-term growth inducing impacts related to the project's construction.* The proposed project's ~~implementation~~ construction would result in employment generation. This anticipated demand for new construction can be accommodated by the existing local labor market.

The proposed project has the potential to indirectly induce population growth by creating approximately three jobs per 1,000 square feet for the area. However, the proposed project would more likely respond to regional demand for additional goods and services. The City of Commerce is currently experiencing a period of population growth. The proposed Citadel Expansion Project would accommodate existing and projected future increased demand for entertainment, commercial recreation, retail services, and other services as well as increased demand for jobs. The proposed project has the potential to foster economic growth. By creating approximately three jobs per 1,000 square feet for the area, the proposed project has the potential to help further decrease the City's unemployment rate. With a greater percentage of the population employed, the average spending power of the local residents would increase. Thus, the average local resident would have more money to spend on housing and retail goods, which would increase

Commerce's tax base for both property and sales taxes. In addition, the proposed project would draw in consumers from the region.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. An irreversible or irretrievable commitment of resources would occur when resources are consumed, committed, or lost as a result of the project's construction and/or subsequent operation. The commitment of a resource would be "irreversible" if the project started a process that could not be reversed or stopped. As a result, the resource productivity or its utility would be consumed, committed, or lost forever. Commitment of a resource would be considered "irretrievable" when the project would directly eliminate the resource, its productivity, or its utility for the life of the project and beyond.

In addition to the continued commitment of the project site to urban development, the proposed project would involve the consumption of energy derived from nonrenewable sources for electricity to power on-site equipment and fossil fuels for project-related vehicle trips. Building materials could be considered permanently consumed. These changes would be irreversible. However, the consumption of these resources is not unique or significant, and will contribute to regional and local waste management goals related to the diversion of solid waste. As a result, the changes associated with the proposed project's construction and subsequent operation does not constitute significant adverse impacts.

SIGNIFICANT & UNAVOIDABLE IMPACTS

This section indicates those significant irreversible environmental changes that would be involved in the approval and subsequent implementation of the proposed project. The development arising from the construction and subsequent operation of the proposed project will represent a long-term commitment of the project site to the proposed use. The environmental analysis contained in Section 3 of the EIR identified potential adverse impacts that may result from the implementation of the proposed project.

- *Construction Air Quality Impacts.* The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases). Therefore, the mass daily construction-related impacts associated with the proposed project would be significant. As a result, the City of Commerce, in its capacity as Lead Agency for the project, would be required to adopt a Statement of Overriding Considerations with respect to short-term (construction) air quality impacts.
- *Operational Air Quality Impacts.* The proposed project would also generate operational emissions that would still exceed the thresholds for ROG, NO_x, and PM₁₀. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to operational air quality impacts.

- *Greenhouse Gas Impacts.* The project-related operational emissions (direct and indirect) would result in 19,480 MTCO₂E/year. This figure represents the estimated mitigated emissions, which includes the use of energy and water efficient appliances and fixtures, the location of the nearest bus stops, the project's infill nature, and that the project contains a mix of uses. Despite the use of in-program mitigation measures, the project's operational GHG emissions are still expected to exceed the 10,000 MTCO₂E/year thresholds. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to greenhouse gas impacts.
- *Traffic Impacts.* When considering *Future with Truck Traffic and Project* if the specific intersection improvements are determined to be infeasible during the design process, the following four study intersections would remain significantly impacted after mitigation: Atlantic Boulevard & Telegraph Road; I-5 Northbound Ramps/Camfield Avenue & Telegraph Road; I-5 Ramps/Commerce Casino & Telegraph Road; and, Washington Boulevard & Telegraph Road. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to traffic impacts.
- *Cumulative Air Quality Impacts.* To determine if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is classified as non-attainment, a cumulative impact analysis was performed to evaluate the combined air quality impacts of any given project and the impacts from existing and proposed future developments in the area. The analysis determined that the cumulative air emissions exceeded the SCAQMD thresholds for NO_x. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to cumulative air quality impacts.
- *Cumulative Greenhouse Gas Impacts.* The related projects would generate 69,468 pounds of CO₂E on a daily basis. This translates into 11,525 metric tons of CO₂E annually. The SCAQMD's threshold is 10,000 metric tons of GHG annually. As a result, the potential cumulative GHG impacts are considered to be cumulatively significant. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to cumulative greenhouse gas impacts.

DESCRIPTION AND ANALYSIS OF ALTERNATIVES

The EIR evaluated the following three alternatives:

- *No Project/No Development Alternative.* According to the *CEQA Guidelines*, Section 15126.6(e), the purpose of evaluating the No Project/No Development Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project.
- *Residential Development Alternative (Area 1).* This alternative would involve the construction of a residential development within the northeastern portion of Area 1 where one of the hotels is proposed. The residential development would consist of six levels with 96 market rate units.

- *Institutional/Office Use Alternative (Area 3).* This alternative would involve the construction of a 70,000 square-foot, four-level office building. The precise occupancy is not known though it could be general office or an institutional use.

An EIR must identify the environmentally superior alternative. The Institutional/Office Alternative would represent the most environmentally superior alternative compared to the other alternatives. In addition, it is the only alternative that would meet all of the project objectives. The No Project/No Development Alternative would be environmentally inferior in that the existing blight and environment conditions for Area2 and Area 3 would remain unchanged. Furthermore, the No Project/No Development Alternative does not meet any of the project objectives. In addition, *CEQA Guidelines* (Section 15126.6(c)) require that, if the environmentally superior alternative is the No Project/No Development Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.



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FINAL ENVIRONMENTAL IMPACT REPORT

SECTION 1 - INTRODUCTION

1.1 PROJECT OVERVIEW & PURPOSE OF THIS EIR

The City of Commerce Public Works and Development Services Department (also referred to hereinafter as the *Lead Agency*) is reviewing a proposal that would permit the expansion of the Citadel shopping center and a 10-acre development site. The entire planning area is located along the northerly side of Telegraph Road between Hoefner Avenue (on the west) continuing east to Washington Boulevard. The land occupied by the existing industrial uses located to the west of Tubeway Avenue and the Commerce Casino and Hotel is not part of the proposed project. The proposed project involves the development of a number of underutilized properties with new retail uses, new hotels, entertainment uses, offices, and other uses.¹ The project-related improvements are detailed in Section 2, herein.

This Environmental Impact Report (EIR) analyzes the proposed project's short-term (construction-related) impacts and long-term (operational) impacts. The City of Commerce (as Lead Agency for this project) circulated a *Notice of Preparation* (NOP) and an Initial Study for a 30-day period to inform the public and other agencies that this *Draft EIR* will be prepared for the proposed project. In addition, the NOP and the Initial Study indicated the scope and content of the environmental analysis that would be considered in the Draft EIR. A copy of the NOP and the Initial Study are included in Appendices Volume 1, which is provided under a separate cover.

The Draft EIR was circulated for public review for a minimum of 45 days. During this 45-day review period, agencies, the public, and other interested parties were requested to comment on the Draft EIR focusing on the environmental analysis and any identified mitigation. The City of Commerce responded to the individual comments received, and both the comments and City's responses have been incorporated into this Final EIR. This Final EIR will then be considered along with the project at a public hearing before the City Council. The project Applicant is Citadel Holdings Group, LLC, 4100 MacArthur Boulevard, Suite #100, Newport Beach, California 92660, and the Wash-Tel Commerce, LLC, 4100 MacArthur Boulevard, Suite #100, Newport Beach, California 92660.

According to the California Environmental Quality Act (CEQA) and CEQA Guidelines, a Final EIR must contain the following information:

- The Draft EIR or a revision of the Draft EIR;
- Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- The responses of the Lead Agency to significant points raised in the review and consultation process;

¹ Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018.

- Any other information added by the agency; and,
- A list of persons and organizations commenting on the Draft EIR.

This Final EIR includes all of the above information required under CEQA and Section 15132 of the State CEQA Guidelines.

1.2 INTENDED USES OF THIS EIR

In accordance with *CEQA Guidelines* Section 15121(a), the purpose of an EIR is “to serve as an informational document that will generally inform public agency decision makers and the public of the potentially significant environmental effects of a project, and to identify possible ways to minimize or avoid the significant effects.” This EIR also includes an analysis of a reasonable range of alternatives to the proposed project. This EIR examines all phases of the proposed project including site preparation, construction, and ongoing operations following the completion of the project’s construction. Pursuant to Section 15105 of the *CEQA Guidelines*, the Draft EIR was circulated for public review for a period of 45 days, beginning March 27, 2019 and ending May 10, 2019. Copies of this Final EIR have been provided to interested agencies and the public and is also available on the City’s website: <http://www.ci.commerce.ca.us>.

1.3 FORMAT OF THIS EIR

This EIR analyzes the potential environmental impacts that may result from the construction and subsequent operation of the proposed project. This EIR consists of the following sections:

- *Section 1 Introduction* provides an overview of the environmental review process, describes the purpose of this EIR, indicates the focus of the environmental analysis, and includes a summary of the EIR’s analysis.
- *Section 2 Project Description* describes the proposed project’s physical and operational characteristics. The project description also includes a discussion of the project’s objectives the Applicant and the Lead Agency seek to accomplish with the implementation of the proposed project. This section also indicates the discretionary actions associated with the project’s approval.
- *Section 3 Environmental Analysis* evaluates the impacts associated with the proposed project’s construction and subsequent occupancy. The analysis considers the existing conditions with respect to the issue being discussed, the potential impacts related to the project’s construction and subsequent operation, the level of the potential impact weighed against thresholds considered to represent a significant adverse impact, potential cumulative impacts, and measures that will be effective in reducing or eliminating a potential impact.
- *Section 4 Other CEQA Considerations* discusses the manner in which the proposed project will contribute to long-term impacts and cumulative impacts from related projects in the area. This

section also indicates those issues where the impact is significant and unavoidable and describes potential growth-inducing impacts.

- *Section 5 Alternatives Analysis* discusses various alternatives that were considered as part of the planning process. The impacts of a no project alternative and several land use alternatives are considered in this analysis.
- *Section 6 References* lists those individuals that were involved in this document's preparation. The sources that were used or consulted as part of the Draft EIR's preparation are identified using footnotes.

The Initial Study and Notice of Preparation (NOP), the air quality worksheets, the noise prediction model, and the utilities worksheets are provided under a separate cover in Appendices Volume 1; the Traffic Report is provided in Appendix Volume 2; and the Traffic Report's Appendices is provided under Appendix Volume 3. Finally, those persons and agencies that commented on the Draft EIR and the Lead Agency's responses are included in Volume 4.

1.4 FOCUS OF ENVIRONMENTAL ANALYSIS

As part of the environmental review for the proposed project, the Lead Agency prepared and circulated an Initial Study that included a preliminary evaluation of potential impacts associated with the project's construction and subsequent operation. The Initial Study provided the basis for determining the nature and scope of the environmental analysis that should be undertaken as part of the EIR's preparation. The environmental analysis in this EIR focused on those issues where it was determined, as part of the Initial Study's preparation, that there was a potential for significant environmental impacts in the absence of mitigation. Under CEQA, a significant effect on the environment means a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by a proposed project. This EIR considers those issues that were identified in the Initial Study as being potentially significant (the Initial Study is included in Appendices Volume 1, which is provided under a separate cover). The issue areas that were identified in the Initial Study as requiring analysis in this EIR are identified below:

- | | |
|--|--|
| <ul style="list-style-type: none">• Aesthetics;• Air Quality;• Cultural Resources;• Greenhouse Gas Emissions;• Hazards & Hazardous Materials;• Hydrology & Water Quality; | <ul style="list-style-type: none">• Land Use & Planning;• Noise;• Population & Housing;• Public Services;• Transportation & Circulation; and,• Utilities. |
|--|--|

The Initial Study also determined that the proposed project would not result in significant adverse impacts for a number of issue areas, which are identified below.

- | | |
|---|---|
| <ul style="list-style-type: none">• Agricultural & Forestry;• Biological Resources;• Geology & Soils; | <ul style="list-style-type: none">• Mineral Resources; and,• Recreation. |
|---|---|

1.5 ISSUES OF POTENTIAL CONTROVERSY

As indicated previously, the Initial Study and NOP were circulated by the City to the State Clearinghouse, interested agencies, and the public. The State Clearinghouse issued a project number for this EIR (SCH No. 2016091024). The NOP was circulated for comments beginning October 22, 2018 and ending November 21, 2018. A copy of the NOP is included in Appendices Volume 1, which is provided under a separate cover. Responses to the NOP were received from the following agencies:

- California Department of Transportation (Caltrans), District 7;
- South Coast Air Quality Management District; and,
- Lozeau Drury LLP (On behalf of Laborers International Union of North America Local Union 300).

Key environmental concerns raised by these entities included potential traffic impacts to State Highways and air emissions from construction and vehicle trips. The Draft EIR addressed each of the aforementioned areas of concern. In addition, a Scoping Meeting was held on November 28, 2018 at City Hall. The City's planning team described the proposed project and discussed the environmental review process. The comments received were in support of the proposed project. The only questions were related to the potential for new housing development in the project area. The project team indicated that the project does not envision new housing at this time.

The Draft EIR was circulated for a 45-day review period. During this review, written comments were received from four public agencies and nine other interested entities. These comment letters in their entirety are included in Volume 4 of the Appendices.

- Sara Dudley, Adams Broadwell Joseph & Cardozo, Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA).
- Patrick Hennessey, Palmiere Tyler, Ryzman Family Trust and American International Industries;
- Michael Alti, Community Legal Advisors Inc., Citadel Business Park Owners Association;
- Nicolas Whipps, Wittwer Parkin LLP, Southwest Regional Council of Carpenters;
- Brandy Salas, Gabrieleno Band of Mission Indians – Kizh Nation;
- Gideon Kracov, Attorney at Law, UNITE HERE Local 11, East Yard Communities for Environmental Justice, Daniel Garcia, Ivan Vasquez, and Leonel Vasquez;
- Richard Drury, Lozeau Drury LLP, Supporters Alliance for Environmental Rights ("SAFER");
- Shine Ling, AICP, Los Angeles County Metropolitan Transportation Authority;
- Lijin Sun, South Coast Air Quality Management District;
- Nedy Warren, The Commerce Casino & Hotel;
- Nestor Velasquez, et al., Residents of the City of Commerce;
- Miya Edmonso, State of California Department of Transportation; and,
- Michael Takeshita, County of Los Angeles Fire Department.

Key environmental concerns raised by these entities included the air quality analysis, potential greenhouse gas impacts, traffic impacts, the potential construction noise impacts, water consumption impacts and the availability of water supplies, and the omission of a housing alternative. The detailed comments on the Draft EIR and responses to the comments are provided in Volume 4.



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SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The project area is located in the north-central portion of the City of Commerce. The City of Commerce is located approximately six miles southeast of downtown Los Angeles and is bounded by Montebello on the east, unincorporated East Los Angeles on the north, the cities of Vernon, Bell, and Maywood on the west, and the City of Bell Gardens on the south.² The location of the City of Commerce in a regional context is shown in Exhibit 2-1. The project area's location in the City is shown in Exhibit 2-2.

The entire project area, referred to herein after as the "Planning Area," is located along the north side of Telegraph Road between Hoefner Avenue (on the west) continuing east to Washington Boulevard. The land occupied by the existing Commerce Casino and Hotel and the industrial properties located to the west of Tubeway Avenue are not part of the proposed project. For the purposes of this CEQA analysis, the three distinct geographic areas that comprise the Planning Area, are referred to as Area 1, Area 2, and Area 3. The geographical characteristics for the three areas are summarized below:

- *Area 1* includes the existing Citadel shopping center complex and the majority of the new improvements will be located in the northeast portion of the Citadel shopping center. These new improvements are collectively referred to as Phase 5. The portion of Area 1 that will be developed includes a surface parking area located in the northeast corner of the existing Citadel Outlets center and two existing concrete tilt-up buildings. The Assessor's Parcel Numbers that are applicable to Area 1 include ~~6336-019-930~~ 6336-019-030, ~~6336-019-931~~ 6336-019-031, 6336-019-033, 6336-019-034, ~~9306-024-017~~ 6336-024-017, and 6336-024-018.³
- *Area 2* consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet. Gaspar Avenue is the demarcation between Area 1 and Area 2. The Assessor's Parcel Numbers that are applicable to Area 2 include 6336-018-920, 6336-018-805, and 6336-017-908.⁴
- *Area 3* consists of approximately 10 acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. Washington Boulevard extends along the east side of Area 3 while Telegraph Road extends along the south side. The Assessor's Parcel Number that is applicable to Area 3 is 6336-010-908.⁵

An aerial photograph of the project area and the surrounding area indicating the three Areas is provided in Exhibit 2-3.

² Google Maps. <https://maps.google.com/maps>

³ Blodgett Baylosis Environmental Planning. Site Survey (October 8, 2018)

⁴ Ibid.

⁵ Ibid.

Source: Blodgett Baylosis Environmental Planning and Quantum GIS

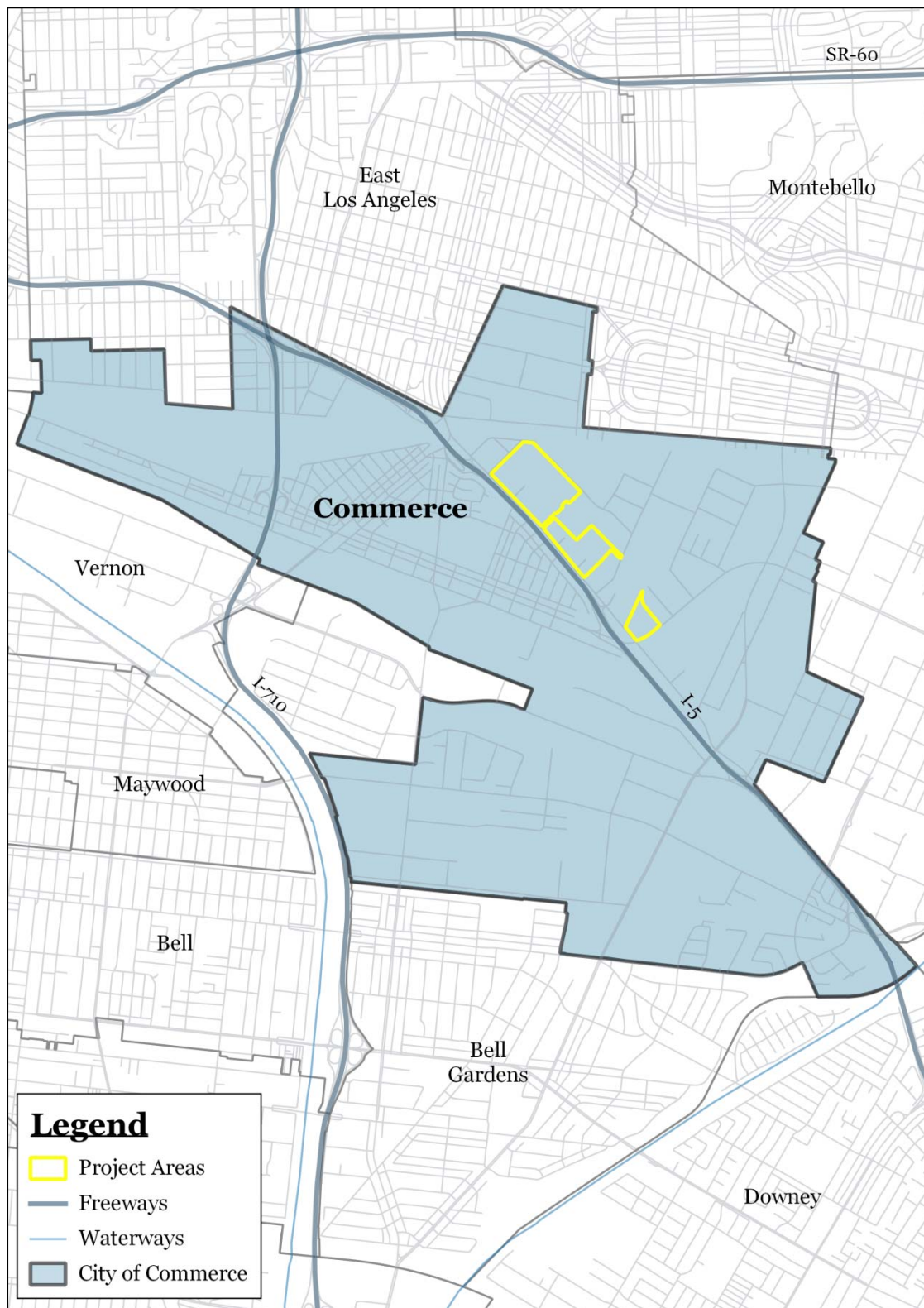


EXHIBIT 2-2
PROJECT LOCATION IN THE CITY
Source: Blodgett Baylosis Environmental Planning and Quantum GIS

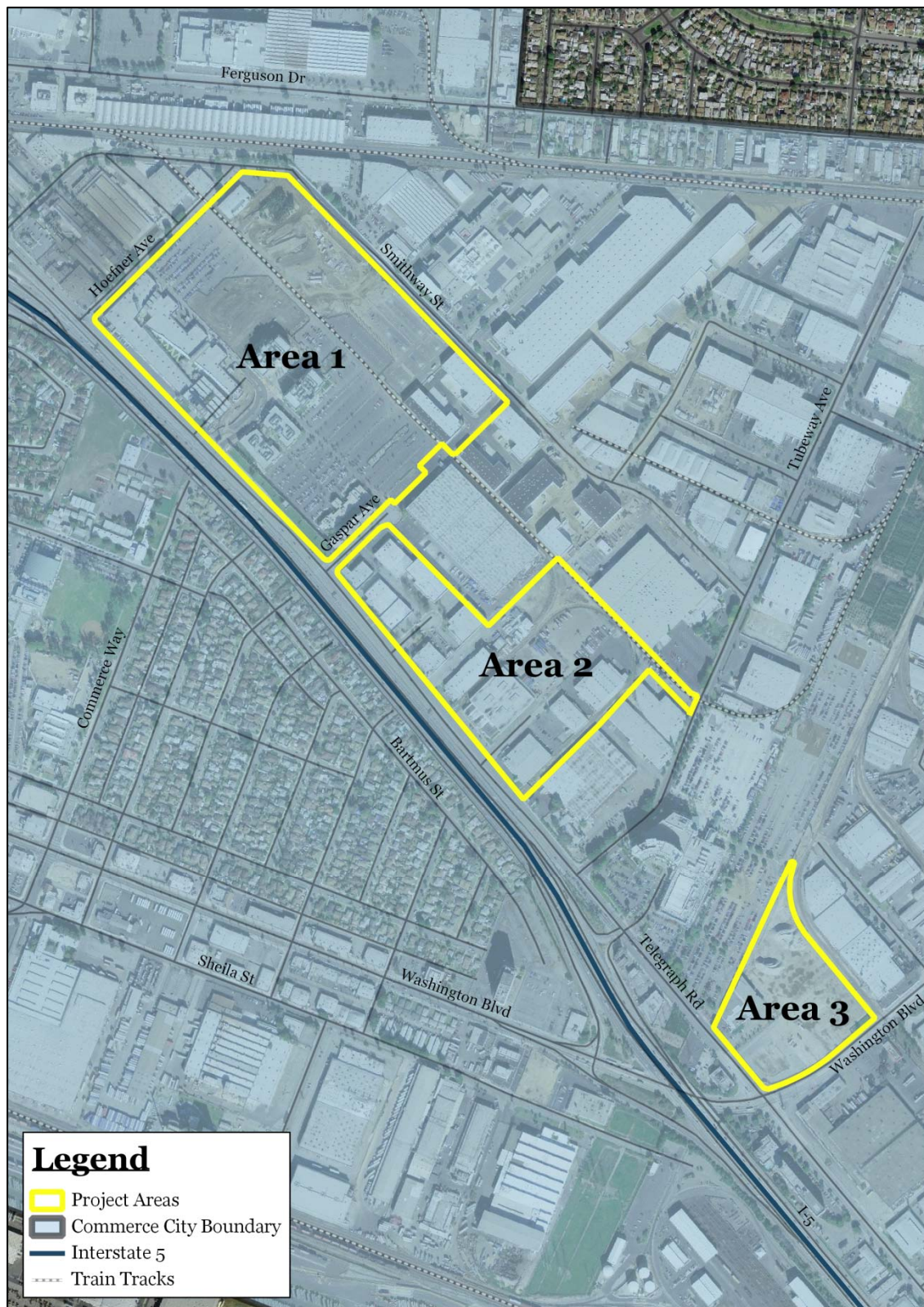


EXHIBIT 2-3 MAP OF PROJECT AREA

Source: Blodgett Baylosis Environmental Planning and Quantum GIS

2.2 ENVIRONMENTAL SETTING

The Planning Area consists of urban development that includes a range of land uses consisting of commercial, industrial, warehousing, surface parking areas, and vacant land. The majority of the existing vacant land is included in Area 2 and Area 3. However, all of the existing vacant land includes parcels that were formerly developed. The affected area encompasses a total land area of approximately 44 acres that include approximately 8 acres in Area 1; 26 acres in Area 2; and 10 acres in Area 3. The environmental setting of the three project areas are summarized below:

- *Area 1* includes an area located within the existing Citadel shopping center complex consisting of approximately 8 acres. Area 1 is predominately located within the northeast portion of the Citadel, which is presently occupied by surface parking and two warehouses.⁶
- *Area 2* consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet. Area 2 is occupied by three buildings, two of which are vacant.⁷
- *Area 3* consists of approximately 10 acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. Washington Boulevard extends along the east side of Area 3 while Telegraph Road extends along the south side. The majority of the site is vacant though a single building used as a furniture outlet retailer occupies the western portion of Area 3.⁸

The existing land uses and development within the three areas are summarized below in Table 2-1.

**Table 2-1
Summary of Existing Uses within Project Area**

Area	Use	Name	Bldg. Area (sq. ft.)	Address	Exhibit ¹
Area 1	Surface Parking	NA	NA	NA	2-4 (A)
	Industrial Bldg.	Unicorp & Uninex Intl.	38,750 sq. ft.	5780 Smithway St.	2-4 (B)
	Industrial Bldg.	New Unoccupied Bldg.	40,625 sq. ft.	5788 Smithway St.	2-4 (C)
Area 2	Industrial Bldg.	Justman Packaging & Display	14,744 sq. ft.	5819 Telegraph Rd.	2-5 (A)
	Industrial Bldg.	Vacant Bldg	36,812 sq. ft.	2366 Travers Ave.	2-5 (B)
	Industrial Bldg.	Vacant Bldg.	36,812 sq. ft.	5901 Telegraph Rd.	2-6 (A)
	Vacant Land	Grading and Site Preparation	NA	NA	2-6 (B)
Area 3	Vacant Land	Graded Land	NA	NA	2-7 (A)
	Commercial Bldg.	Los Angeles Furniture Online	22,500 sq. ft.	6241 Telegraph Rd.	2-7 (B)

1. Reference indicates the corresponding photograph provided in Exhibits 2-4 through 2-7.
Source: Blodgett Baylosis Environmental Planning and Los Angeles County Tax Assessor

⁶ Blodgett Baylosis Environmental Planning. Site Survey (October 8, 2018)

⁷ Ibid.

⁸ Ibid.

The existing land uses and development within the three project areas (Area 1, Area 2, and Area 3) total 190,243 square feet including 79,375 square feet in Area 1; 88,368 square feet in Area 2; and 22,500 square feet in Area 3. The existing vacant and undeveloped parcels located within the Planning Area were previously occupied by development that has since been demolished. The existing Citadel Outlet complex contains a variety of commercial retail, office, and hotel uses. The main Citadel complex, which contains retail, hospitality, and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3). The existing conditions within the three Areas are illustrated in Exhibits 2-4 through 2-7. The photographs included in these exhibits are referenced in Table 2-1.

2.3 PROJECT DESCRIPTION

The project will be divided into three distinct geographic areas referred to as Area 1 (Phase 5), Area 2 (Phase 6), and Area 3 (the portion located on the northwest corner of Washington Boulevard and Telegraph Road).

2.3.1 AREA 1 - CITADEL EXPANSION (PHASE 5)

Area 1 includes a portion of the existing Citadel shopping center complex. The proposed new improvements are also collectively referred to as Phase 5. The new elements proposed as part of the Area 1 development are outlined below.

- *Building 20* will be a newly constructed 15,000 square-foot, three-level commercial building. The first level will consist of approximately 7,030 square feet while the mezzanine will have approximately 1,810 square feet. The second level will contain 6,160 square feet of floor area. An escalator will provide pedestrian travel between the two main levels.⁹
- *Building 21* will be a new 107,150 square-foot commercial building that will be constructed immediately south of Building 20. The building will be subdivided into multiple retail tenant spaces. Larger tenant spaces will consist of two levels while the remaining smaller tenant spaces will have a single level. The floors within the two-level tenant spaces will be connected by escalators to facilitate pedestrian travel between the two floors.¹⁰
- *New and expanded parking structures* will provide a total of 1,618 spaces. The first parking structure will consist of four levels and provide total of approximately 750 parking spaces. The new parking structure will be constructed below the two hotel buildings. Access to the parking structure will be possible using a direct driveway connection with Gaspar Avenue (on the east) and a new drive aisle access with Smithway Street on the north.¹¹ A second six level parking structure consisting of 630 stalls will be constructed north of an existing 5 level parking structure. This existing parking structure will be expanded by 238 spaces.

⁹ Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018.

¹⁰ Ibid.

¹¹ Ibid.



2-4(A): View of the portion of the parking lot that will be improved facing south



2-4(B): View of the Citadel Business Center facing south



2-4(C): View of the adjacent Citadel Business Center to the east facing south

EXHIBIT 2-4
PHOTOGRAPHS OF AREA 1
Source: Blodgett Baylosis Environmental Planning

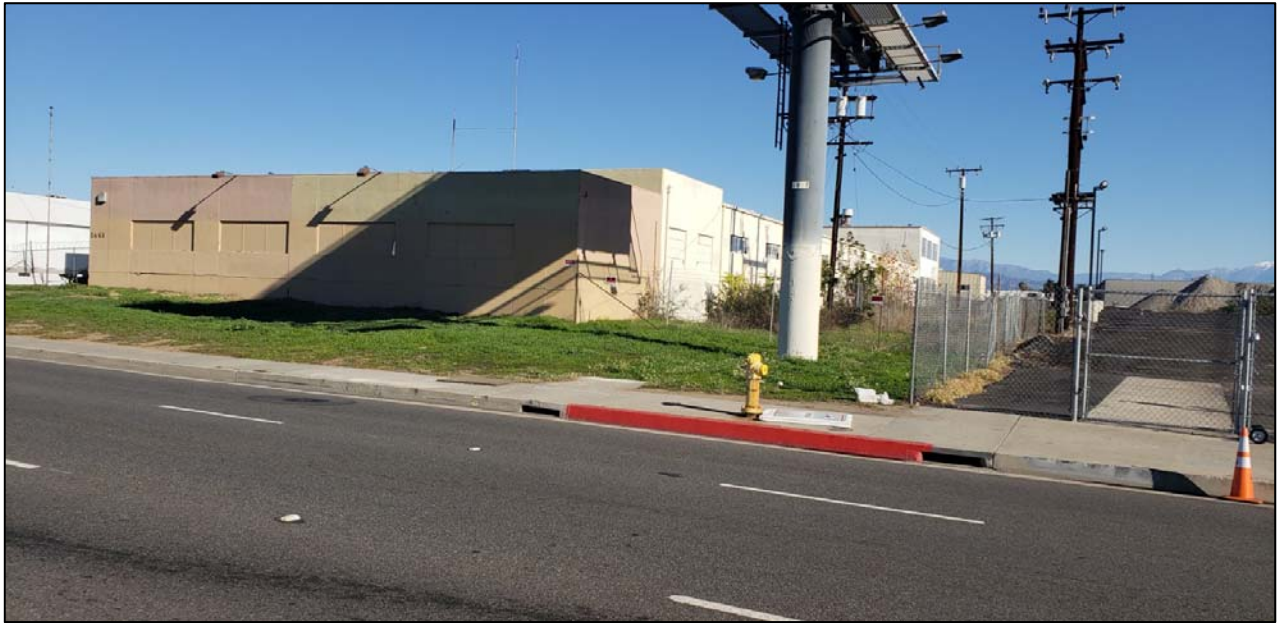


2-5(A): View of the Justman Packaging and Display facing north



2-5(B): View of the unoccupied building facing northwest

EXHIBIT 2-5
PHOTOGRAPHS OF AREA 2
Source: Blodgett Baylosis Environmental Planning



2-6(A): View of the unoccupied building facing northwest



2-6(B): View of a surface parking lot along the north side of Telegraph Road facing north

EXHIBIT 2-6
PHOTOGRAPHS OF AREA 2
Source: Blodgett Baylosis Environmental Planning



2-7(A): View of the 10-acre site facing north



2-7(B): View of the existing on-site improvements facing west

EXHIBIT 2-7
PHOTOGRAPHS OF AREA 3
Source: Blodgett Baylosis Environmental Planning

- *Traveler's Hotel* will be constructed in the northeast portion of the Phase 5 area. This five-level hotel will contain approximately 174 guest rooms. This hotel will have a total floor area of 80,000 square feet. As indicated previously, this hotel structure will be constructed over the parking structure levels. The maximum height of the hotel/parking structure will be approximately 150 feet above grade.¹²
- *Loft Hotel* will be constructed south of the Traveler's Hotel and this hotel building will also be constructed over the parking structure. This hotel building will consist of five levels on top of the four-level parking structure. This hotel will contain 96 guest rooms with a total floor area of 98,000 square feet. The hotel will also include a monorail platform that will provide pedestrian access to the monorail that will pass through the parking structure's fourth level. The maximum height of the hotel/parking structure will be approximately 150 feet above grade.¹³
- The *Food/Retail* will include approximately 41,571 square feet of additional retail/food related uses.
- The *Hotel Access* will be provided via the parking structure located below the parking structure as well as a Porte Corche that will be accessible from Gaspar Avenue. The Porte Corche will be shared by both hotels.¹⁴
- A *New/Expanded Parking Structures* will be constructed in the southern portion of Area 1. The new parking structure will consist of six levels (one subterranean and five above ground levels) and will contain up to 680 stalls. In addition, an existing five level parking structure will be expanded to provide an additional 238 parking spaces.¹⁵

Other improvements that will be located in Area 1 include a new Grand Fountain Plaza, artwork, pedestrian paths, safety and decorative lighting, landscaping and a bus/transit area. A new monorail will be constructed that will extend through the existing Citadel Outlets continuing to Area 2. The development plan for Area 1 is shown in Exhibit 2-8.

2.3.2 AREA 2 - CITADEL EXPANSION (PHASE 6)

Area 2 consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet. Gaspar Avenue is the demarcation between Area 1 and Area 2. The new improvements are collectively referred to as Phase 6. The majority of the new buildings will be located in the northern and eastern portion of Area 2 while surface parking fields will be located between the aforementioned buildings and the Telegraph Road right-of-way.

¹² Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.

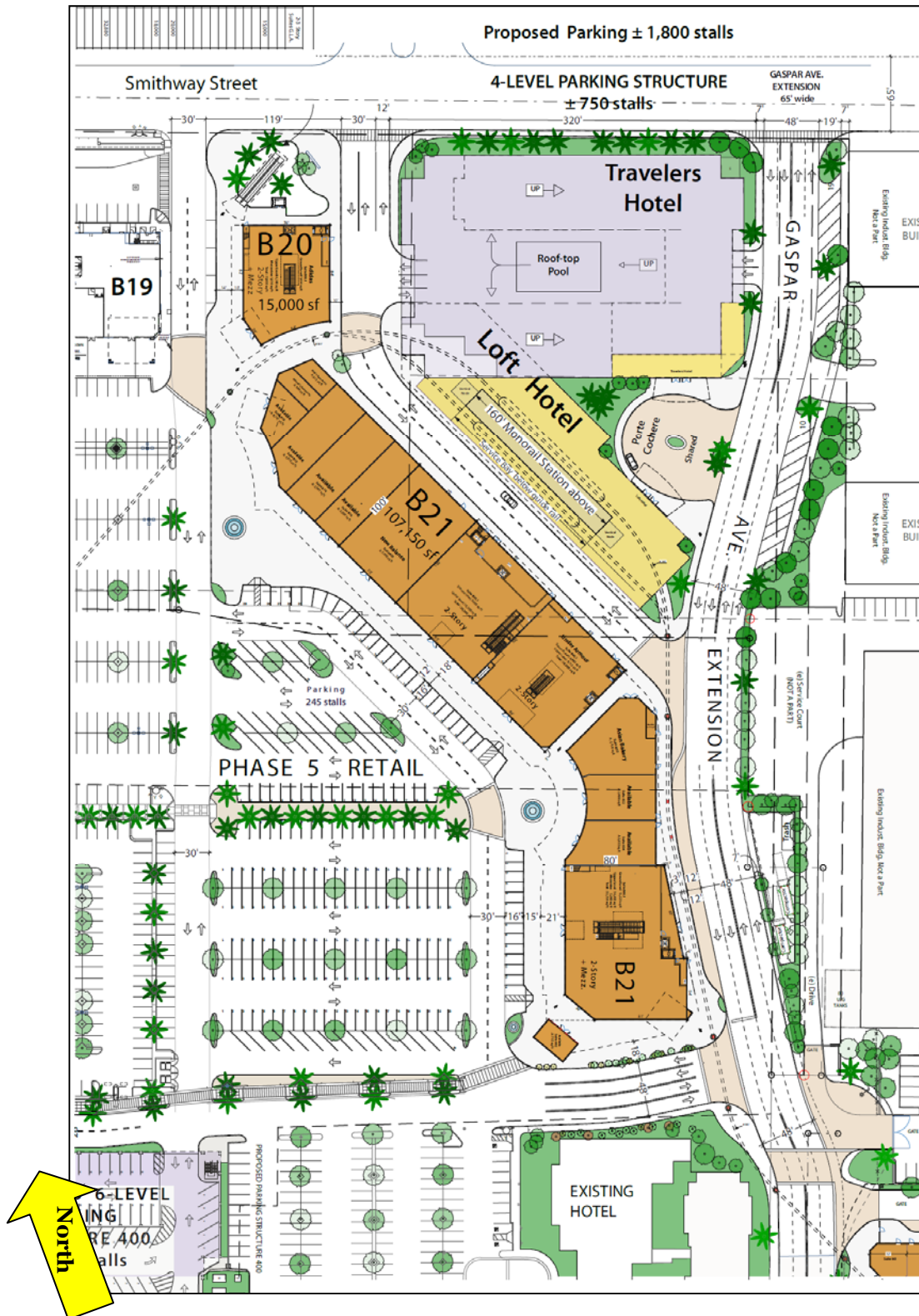


EXHIBIT 2-8
FUTURE DEVELOPMENT CONCEPT FOR AREA 1
Source: Studio Progetti, Inc.

The new elements proposed as part of the Area 2 (Phase 6) development are outlined below.

- *Building 22* will be a new 46,834 square-foot commercial retail building that will include both single-level and two-level tenant spaces. An escalator will provide pedestrian travel between the two levels within the two level tenant spaces. The public entrances to the individual tenant spaces will be located along the building's south facing elevation.¹⁶
- *Building 23* will be a new 23,107 square-foot retail building that will be constructed immediately east of Building 22. Similar to Building 22, this building will include both single and two-level retail tenant spaces. The floors of the two-level retail space will include an escalator for pedestrian access. The public entrances to the individual tenant spaces will be located along the building's south facing elevation.¹⁷
- A *Recreational Commercial* use (referred to as an "Adventure Experiential Retail"), consisting of two levels and 120,000 square feet of floor area, will be centrally located within Area 2. The public entrances to this building will be located on the north and south building elevation. A surface parking area that will accommodate both conventional and oversized parking will be located to the rear (north side) of the building.¹⁸
- A new *Hotel and Parking Structure* will be located in the northeastern portion of Area 2. The new parking structure will consist of four parking levels that will accommodate approximately 700 parking spaces. A new hotel, consisting of nine floors and 185,000 square feet, will be constructed over the parking structure and will contain approximately 500 guest rooms. The hotel's main lobby area and public entry will be located along the parking structure's south facing elevation. The hotel lobby will also include a pedestrian access/platform to the monorail system.¹⁹
- A *Movie/Entertainment Complex* will consist of three levels and will include approximately 150,000 square feet of floor area. Small fast-food restaurants that will largely cater to those attending the theater along with an outside court area will be located along the theater's west facing elevation. A 150-foot tall design element (referred to as an Icon Tower) will be situated near the theater building's southeast corner.²⁰
- A *Restaurant*, consisting of approximately 3,140 square feet, will be located in the westernmost portion of Area 2.²¹

The development plan for Area 2 is shown in Exhibits 2-9 and 2-10.

¹⁶ Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Ibid.

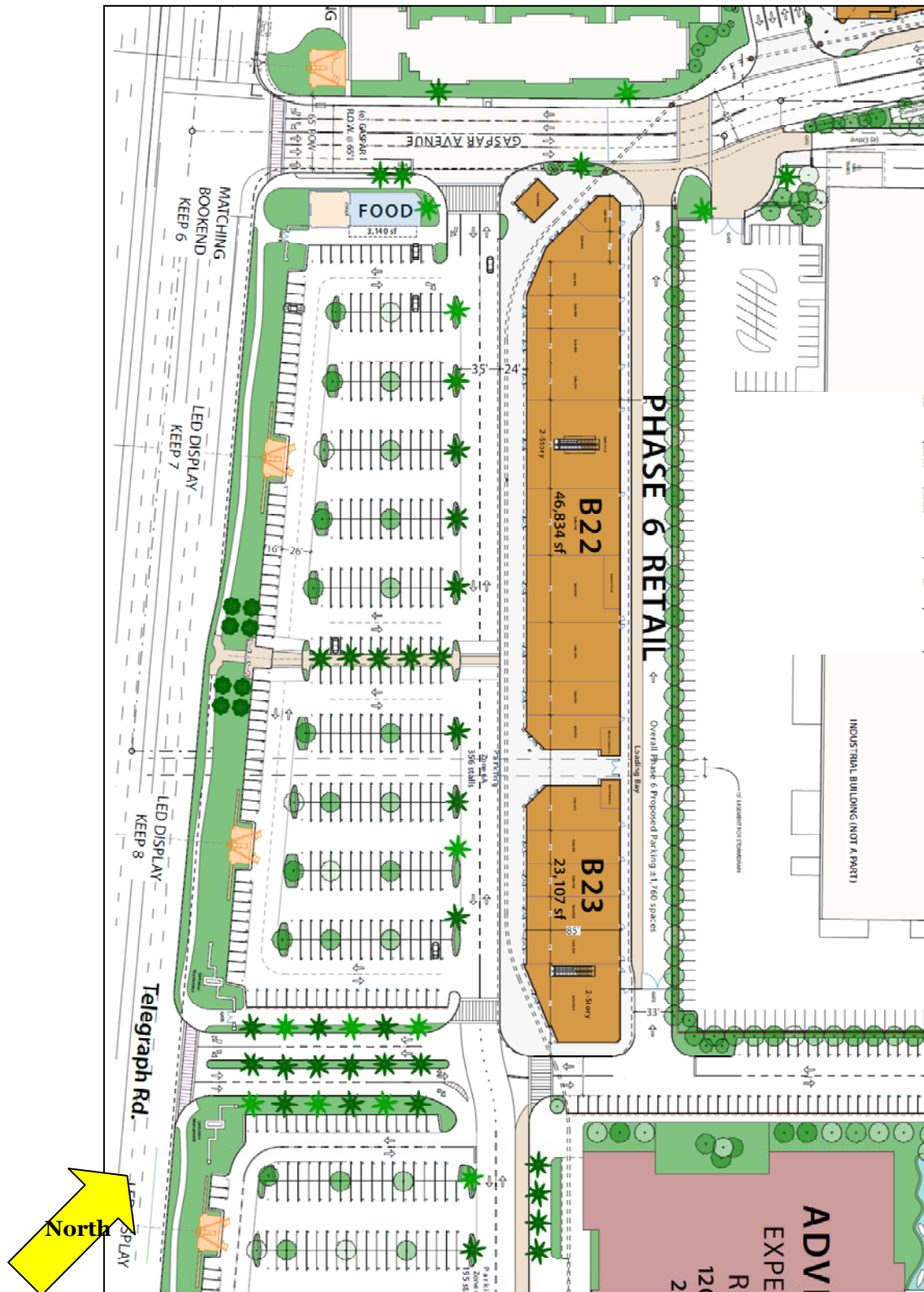


EXHIBIT 2-9
FUTURE DEVELOPMENT CONCEPT FOR AREA 2 (WEST PART)
Source: Studio Progetti, Inc.

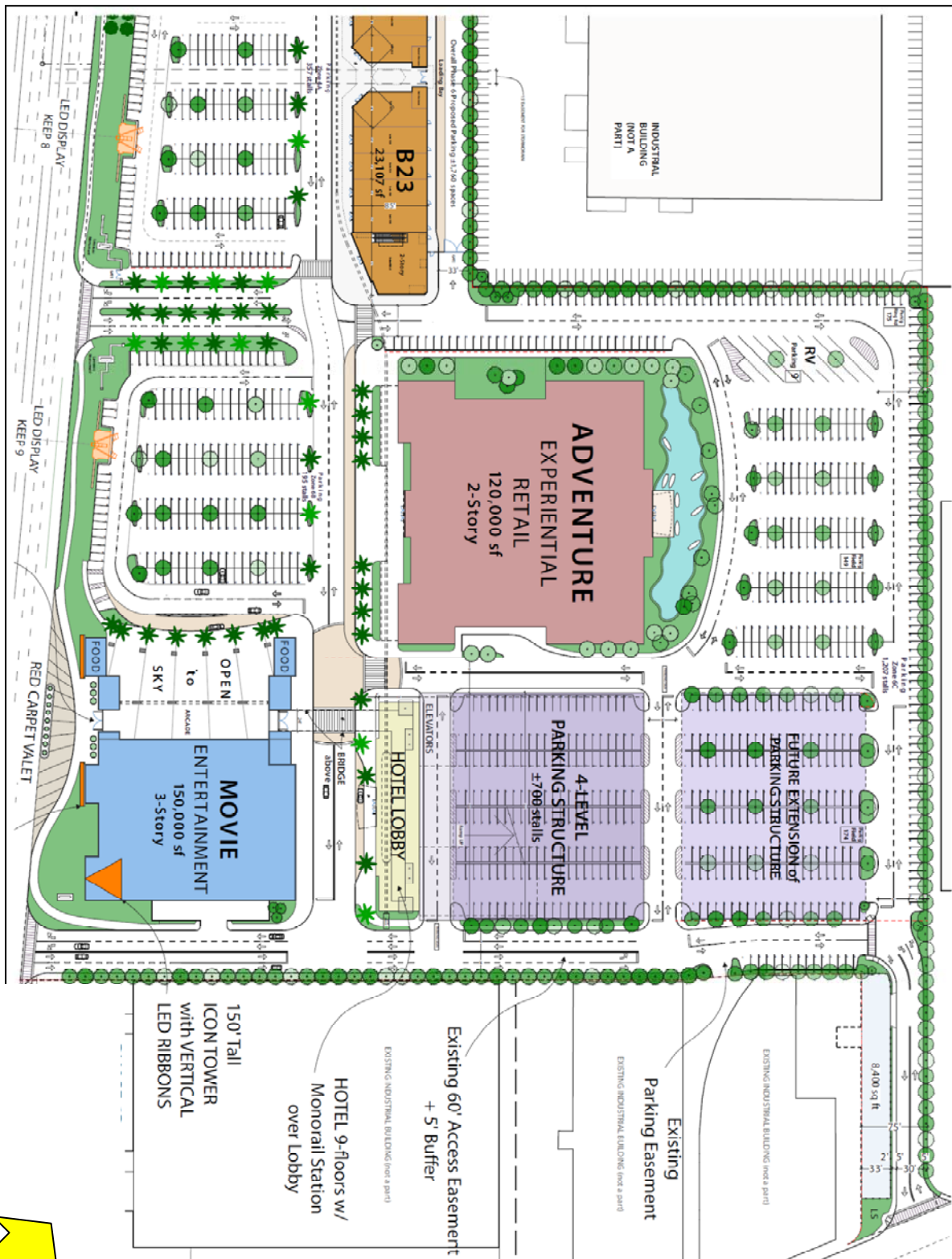


EXHIBIT 2-10
FUTURE DEVELOPMENT CONCEPT FOR AREA 2 (EAST PART)

Source: Studio Progetti, Inc.

2.3.3 AREA 3 – NW CORNER OF WASHINGTON BLVD. & TELEGRAPH RD.

Area 3 consists of approximately ten acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. Washington Boulevard extends along the east side of Area 3 while Telegraph Road extends along the south side. The new elements that are proposed as part of the Area 3 development are outlined below.

- *Fast Food Restaurant Pad 1* will be a new 2,000 square-foot restaurant located in the northeastern portion of Area 3. This restaurant will also include a drive-thru lane. Approximately 38 parking spaces will be provided.²²
- *Fast Food Restaurant Pad 2* will be a new 4,400 square-foot restaurant located in the eastern portion of Area 3 along the Washington Boulevard frontage. This restaurant will also include a drive-thru lane. A total of 42 parking spaces will be provided.²³
- *Sit Down Restaurant Pad 3* will be a new 5,000 square-foot restaurant located on the southeast corner of Area 3. This restaurant will also include an outdoor dining area. A total of 77 parking spaces will be provided.²⁴
- *Fast Food Restaurant Pad 4* will include a new 2,000 square-foot restaurant located in the southwest portion of Area 3 along the Telegraph Road frontage. This restaurant will also include a drive-thru lane. A total of 33 parking spaces will be provided.²⁵
- The *Pad 5 Alternative* will include either a *Fast Food Restaurant* consisting of 4,500 square feet of floor area and 73 parking stalls. As an alternative, a four level, 70,000 square foot office building will be constructed on Pad 5. This 70,000 square-foot office building may also be a public facility or public use.²⁶
- A new *Warehouse/Industrial Building* will be located in the northwest portion of Area 3. This building will have a total floor area of approximately 55,000 square feet. A total of seven loading docks will be located along the building's west-facing elevation. Access to the truck receiving and loading area will be secured by gates. A total of 42 surface parking spaces will be provided in a surface parking lot located to the east of the building and approximately 20 surface parking spaces in the rear of the building.²⁷

Other improvements that will be located in Area 3 include landscaping, internal roadways, and parking areas. The development plan for Area 3 is shown in Exhibit 2-11.

²² Studio Progetti. *A Project of Craig Realty Group. [The] Citadel. Overall Site Plan.* November 21, 2018.

²³ Ibid.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Ibid.

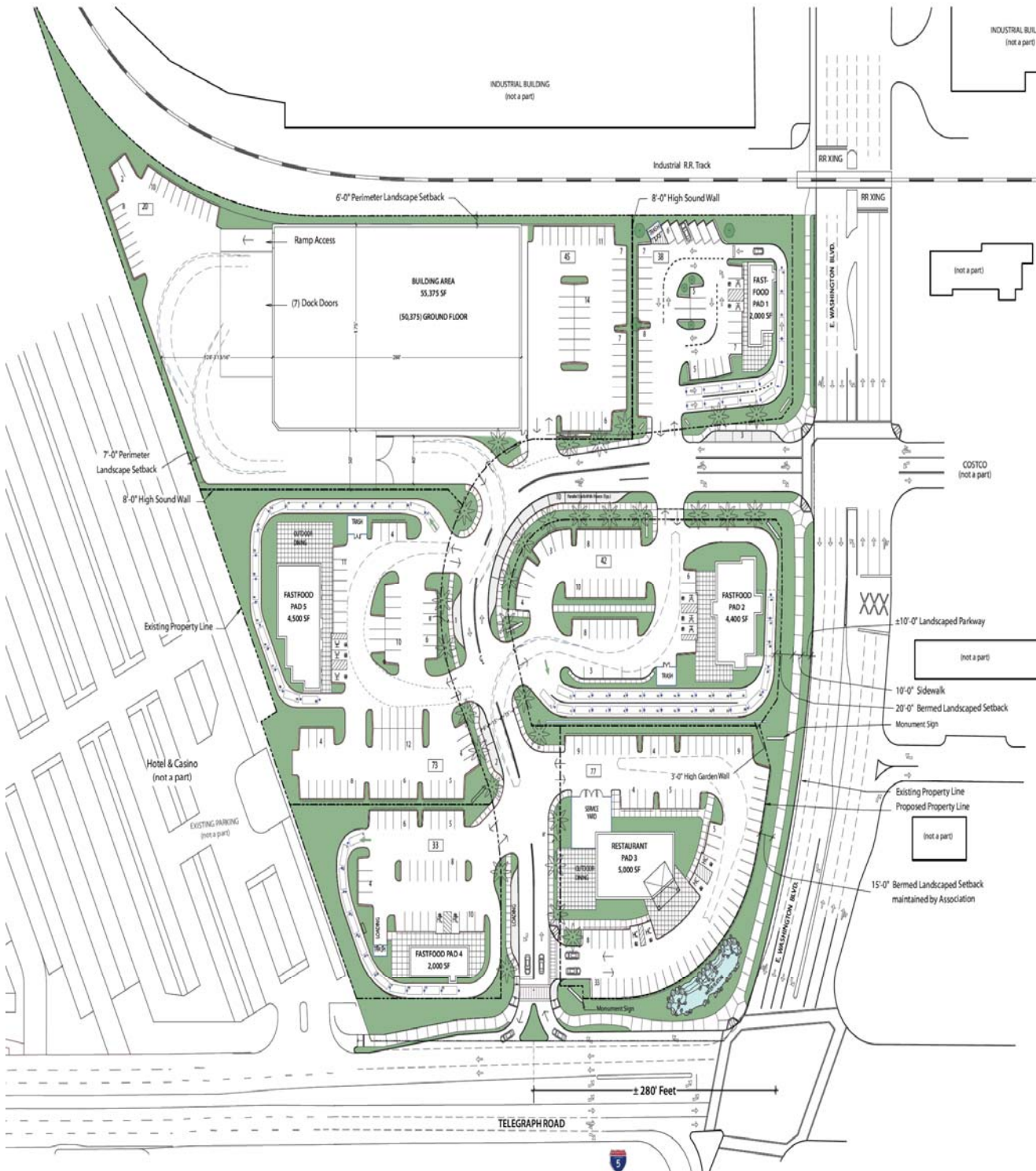


EXHIBIT 2-11
FUTURE DEVELOPMENT CONCEPT FOR AREA 3
 Source: Studio Progetti, Inc.

2.3.4 SUMMARY OF NEW DEVELOPMENT

The proposed *new* development within the three areas (Area 1, Area 2, and Area 3) will have a total floor area of 1,007,202 square feet. The new development will consist of approximately 237,662 square feet of retail uses; 358,000 square feet of hotel uses totaling 770 rooms; 270,000 square feet of theater, entertainment, and recreation uses; 16,540 square feet of food serving uses, 70,000 square feet of office uses, and 55,000 square feet of industrial uses. This breakdown in land uses assumes that Pad 5 in Area 3 will be developed as an office use instead of a fast food restaurant. The proposed land uses and development for the three project areas are summarized below in Table 2-2.

Table 2-2
Summary of Proposed Development within the Planning Area

Area	Project Element	Details	Description
Area 1	Building 20 Retail	15,000 sq. ft.	Three level commercial retail building.
	Building 21 Retail	107,150 sq. ft.	One and two level multi-tenant retail building.
	Traveler's Hotel	80,000 sq. ft.	Five level, 174 room hotel.
	Loft Hotel	93,000 sq. ft.	Five level, 96 room hotel.
	Food/Retail	45,571 sq. ft.	Restaurant and retail uses.
	Parking Structure	750 spaces	Four level parking structure containing 750 spaces.
	New Parking Structure	680 spaces	Six level parking structure containing up to 680 spaces.
	Parking Structure Expansion	238 spaces	Expansion of existing five level parking structure 238 spaces.
Area 2	Building 22 Retail	46,834 sq. ft.	Single and two level multi-tenant retail spaces.
	Building 23 Retail	23,107 sq. ft.	Single and two level multi-tenant retail spaces.
	Recreation/Commercial Bldg.	120,000 sq. ft.	Two level adventure experiential commercial.
	Hotel	185,000 sq. ft.	Nine levels over the parking structure with 500 guest rooms.
	Gaspar Food Pad	3,140 sq. ft.	Single level restaurant.
	Entertainment Complex	150,000 sq. ft.	Three level theater building & supporting restaurant uses.
	Parking Structure	700 parking spaces	Parking structure with four levels below the hotel.
Area 3	Pad 1 Fast Food Restaurant	2,000 sq. ft.	Fast food restaurant with drive-thru lane.
	Pad 2 Fast Food Restaurant	4,400 sq. ft.	Fast food restaurant with drive-thru lane.
	Pad 3 Restaurant	5,000 sq. ft.	Sit down restaurant.
	Pad 4 Fast Food Restaurant	2,000 sq. ft.	Fast food restaurant with drive-thru lane.
	Pad 5 Office ¹	70,000 sq. ft.	Four level buildings that may be an <u>office or public</u> use.
	Warehouse/Industrial	55,000 sq. ft.	Industrial building with seven loading docks.

Notes:

1. Pad 5 may be developed as a 4,500 square-foot fast food restaurant use with a drive-thru lane instead of the office building.
Source: Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018

2.4 CONSTRUCTION PHASING

The proposed areas will be constructed in phases. Other than the parking structures and other minor improvements, construction of the 10-acre Washington Boulevard/Telegraph Road site (Area 3) will likely commence first. Work on Area 3 will commence in 2019-2020 allowing individual businesses to start to open in 2020. Work on Area 1 will begin in 2020-2021. Finally, Area 2 (Phase 6) will be developed once Area 1 is open for business the two other Phases are open for business. The earliest all three components of the project will be open for business is by the year 2021 2023.

2.4.1 AREA 1 CONSTRUCTION CHARACTERISTICS

Work in Area 1 could commence in ~~2019~~ 2020-2021 and is anticipated to be finished and open for business starting in ~~2021~~ and fully 2022.

- The two existing warehouses in Area 1 will be demolished in 2020 ~~once the replacement building has been constructed in Area 3.~~
- The construction of the Gaspar Avenue extension, the retail rear service roadway, and one of the parking structures the proposed retail will commence in ~~late 2019~~ 2020 with an anticipated completion in 2020 or early 2021.
- The new retail buildings and the hotels will erected during this phase. The parking structure and Traveler Hotel construction may commence in 2020 with an anticipated completion in mid year 2022. The Loft-style Hotel and Monorail Station are anticipated for completion in 2023 (the proposed monorail may open concurrently with the hotel or in 2024).

2.4.2 AREA 2 CONSTRUCTION CHARACTERISTICS

Finally, the majority of Area 2 (Phase 6) will be developed once Area 1 is the two other Phases are open for business with construction for Area 2 beginning in 2024. ~~Demolition and site work on Area 2 could commence as early as 2020 with an anticipated completion in phases starting in 2023 through 2026.~~

- The proposed Monorail will require at least three years to complete from engineering, design, to completion with commissioning and National Transportation Safety Board (NTSB) approvals. The Monorail is anticipated to be completed in 2023/2024.
- The existing buildings will be demolished in Area 2 and this demolition will require two months to complete. The existing asphalt pavement will be removed during this phase. In addition, the weeds, gravel, and dirt that occupies the eastern portion of Area 2 will be removed. The excavation of earth to accommodate the installation of the building pads, footings, foundations, and piping will occur during this phase. This phase will last for two months.
- Buildings 21 and 22 and the major tenant spaces will erected during this phase. The finishing of the buildings, paving, and the installation of landscaping for the Area 2 development will follow.

2.4.3 AREA 3 CONSTRUCTION CHARACTERISTICS

Work on Area 3 will commence in 2019-2020 ~~allowing and is anticipated to be complete and~~ individual businesses ~~to would~~ start to open in 2020. The key construction related elements that are applicable to Area 3 are outlined below.

- The furniture outlet building will be demolished. This phase will require one month to complete.
- The existing asphalt pavement curbs and gutters, interior roadways will be removed during this phase. In addition, the weeds, gravel, and dirt that occupies the eastern portion of Area 3 will be removed. The excavation of earth to accommodate the installation of the building pads, footings, foundations, and piping will also occur during this phase. This phase will last between three to four months.
- The fast food restaurants, sit-down restaurant, office, and industrial building will be erected during this phase. The vertical construction period for the individual sites will range from 12 to 24 months.
- The concluding phase for Area 3 will involve the finishing of the buildings, paving, and the installation of landscaping. This phase will take approximately three months to complete.

2.5. OVERVIEW OF DISCRETIONARY ACTIONS

As currently envisioned, the project will require the approval of the following discretionary actions:

- The entire planning area (Area 1 [existing Citadel], Area 2 [approximately 26 acres], and Area 3 [approximately 10 acres]) will be included in and subject to two statutory development agreements (DAs) pursuant to California Government Code Section 65863 through 65867, which will be approved by ordinance, requiring Planning Commission review and City Council approval. The first DA will apply to Area 1 and Area 2. The second DA will apply to Area 3. Both DAs will provide expedited site plan review and a master sign plan review.
- Proposed Zone Changes (ZC) will be included in the DAs. A proposed Zone Change from M-2 (*Heavy Industrial*) to C-2 (*Commercial*) will be required for two sites located in Area 1. These two sites will required a zone change from M-2 to C-2. Area 3 will require up to two zone changes. First, site for the proposed industrial building will need to be rezoned to M-2 to permit the proposed use. Furthermore, if an institutional/public/government facility is to be located on a portion of the joint venture site, the site must be zoned CPF (Commercial Public Facility Zone) to allow for the proposed use.
- The approval of the project and the certification of the Final EIR.

Other permits will be required as part of the proposed project's approval. These other permits will include, but may not be limited to, a Solid Waste Facility Permit, a Construction Stormwater Permit (State of California Water Resources Control Board), a General Industrial Stormwater Permit (State of California

Water Resources Control Board), a Grading Permit (City of Commerce), a Building Permit (City of Commerce), and an Occupancy Permit (City of Commerce).

2.6 PROJECT OBJECTIVES

The objectives for the proposed project include the following:

- The addition of new upscale retail tenant uses for this key corridor in the City;
- The erection and operation of a new state of the art hotel uses;
- The creation of an aesthetically attractive, high-quality design that reflects the property's location within view of those traveling along the I-5 Freeway;
- The provision of a high level of accessibility to and through the Telegraph Road corridor, to promote pedestrian travel and efficient vehicular access; and,
- The enhancement of the economic vitality of the City by providing sales tax and other revenue generation opportunities.
- The creation of new jobs for the local economy.



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SECTION 3. ENVIRONMENTAL ANALYSIS

This section of the EIR indicates the potential environmental impacts that may result from the construction and subsequent operation of the proposed project. The scope of the analysis is detailed herein in Section 1.5. In terms of the evaluation of potential environmental effects, there are four possible outcomes:

- *No Impact.* The proposed project will not have any measurable environmental impact on the environment.
- *Less Than Significant Impact.* The proposed project may have the potential for impacting the environment, although these impacts are likely to be below levels or thresholds that the City or other responsible agencies consider to be significant.
- *Less Than Significant Impact with Mitigation.* The proposed project may have the potential to generate impacts that are considered to represent a significant impact on the environment. However, the level of impact may be reduced to levels that are considered to be less than significant with the implementation of the recommended mitigation measures.
- *Potentially Significant Impact.* The proposed project may, or is known to represent impacts, which are considered significant, even after the adoption of all feasible mitigation. In these instances, the City Council would be required to make findings related to a Statement of Overriding Considerations if it wishes to approve the proposed project.

The analysis of each issue area considers the following:

- The discussion of each issue begins with a section entitled *Scope of Analysis* that provides an overview of the analysis called for in the Initial Study prepared for the proposed project.
- The *Environmental Setting* describes the regulatory framework and the existing conditions with respect to the issue being analyzed and serves as the baseline against which the environmental impacts are weighed.
- The *Thresholds of Significance* indicates those criteria and standards used by the City, responsible agencies, and trustee agencies in the identification of potentially significant effects.
- The *Environmental Impacts, Mitigation Measures, and Significant Impacts* discussion indicates the potential short-term (construction-related) and long-term (operational) impacts for each issue analyzed; the measures that will be effective in reducing or eliminating an impact; and whether there are any remaining unmitigable significant environmental impacts following mitigation.

3.1 AESTHETIC IMPACTS

This section of the EIR describes the existing conditions with respect to aesthetics, light, and glare and the potential impacts associated with the proposed project's construction and subsequent operation on visual resources within the site and its surroundings.

3.1.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation.²⁸ The environmental analysis undertaken as part of the Initial Study's preparation indicated the EIR should evaluate the following issue:

- The proposed project's potential for an adverse effect on a scenic vista;
- The proposed project's potential for substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- The proposed project's potential for substantial degradation of the existing visual character or quality of the site and its surroundings; and,
- The proposed project's potential for a new source of substantial light and glare that would adversely affect day or night-time views in the area.

3.1.2 ENVIRONMENTAL SETTING

Regulatory Setting, State Regulations

The Planning Area is located to the north of the Santa Ana Freeway (Interstate 5 or I-5). Because of the Planning Area's proximity to the aforementioned freeway, certain protocols must be adhered to ensure that design and lighting from those properties located next to freeways do not interfere with the night time vision of drivers on the Freeway.

The *California Department of Transportation (CALTRANS)* regulates the placement of outdoor advertising displays visible from California Highways. The State of California Outdoor Advertising Act (COAA) establishes restrictions on advertising structures that are located within 1,000 feet of a freeway or highway. The COAA establishes limitations on the content, size, location, and other characteristics of advertising structures. CALTRANS performs regular reviews of freeways and highways to enforce outdoor advertising requirements under the Federal Highway Beautification Act and the COAA.²⁹

²⁸ Copies of the Notice of Preparation (NOP), the Initial Study are included in Appendices Volume 1, which is provided under a separate cover.

²⁹ California Department of Transportation. *Outdoor Advertising*. Website visited on January 15, 2019.
<http://www.dot.ca.gov/trafficops/oda/>

A classified landscaped freeway is a section of freeway with ornamental vegetation planting that meets the criteria established by the California Code of Regulations, Outdoor Advertising Regulations, Title 4, Division 6. This designation is used in the control and regulation of outdoor advertising displays. That segment of the I-5 Freeway located immediately adjacent to the project area is not a designated “Landscaped Freeway” segment.³⁰

Regulatory Setting, City of Commerce General Plan

The *City of Commerce General Plan* is responsible for regulating the design, appearance, and maintenance of land uses and development in the City. The primary regulatory controls include the City of Commerce General Plan and Zoning Ordinance. The City of Commerce General Plan includes the following policies that are directly relevant to the proposed project.³¹

- *Community Development [Element] Policy 2.1.* The City of Commerce will continue to promote the development of a quality retail and commercial entertainment district in the vicinity of Telegraph Road, north of the Santa Ana Freeway.
- *Community Development [Element] Policy 2.4.* The City of Commerce will continue to preserve and promote the improvement of the existing commercial areas, including the Commerce Center, the Telegraph Road/Washington Boulevard area, the Atlantic/Washington Redevelopment Project Area, the Commerce Business Park, and the commercial properties located along Slauson Avenue.
- *Community Development [Element] Policy 2.8.* The City of Commerce will continue to encourage the development of a high-intensity, highly visible commercial corridor consisting of offices, hotels, and retail and entertainment uses along Telegraph Road, extending from Hoefner Avenue to Vail Avenue.
- *Community Development [Element] Policy 4.3.* The City of Commerce will continue to promote the development of the Citadel and neighboring areas as a focal point for family entertainment.
- *Community Development [Element] Policy 6.2.* The City of Commerce will strive to see that commercial properties are maintained and that obsolete signage is removed.
- *Community Development [Element] Policy 6.3.* The City of Commerce will require new commercial and industrial development to employ architectural and site design techniques that will promote quality and efficient development.

Property maintenance requirements are governed by the *City of Commerce Municipal Code*.³² The City of Commerce Code Enforcement Division ensures that all properties in the City are maintained pursuant to community standards as outlined in the Municipal Code. Relevant sections of the Municipal Code include

³⁰ California Department of Transportation. *Classified Landscaped Freeways*. Website visited on January 15, 2019.
<http://www.dot.ca.gov/design/lap/livability/classified-landscaped-fwys>.

³¹ Commerce, City of. *City of Commerce 2020 General Plan*. January 2008

³² Commerce, City of. *City of Commerce Municipal Code*. Website accessed January 7, 2019.

Chapter 19.09.030 (Development Standards) and Chapter 19.19 (Site Planning and General Development Standards).

Regulatory Setting, City of Commerce Municipal Code

The City of Commerce Municipal Code, Chapter 19.19.030 (Property Maintenance) includes the following pertinent standards to regulate the maintenance of all properties, land uses, and structures in the City:

- Debris, rubbish, and trash, including but not limited to discarded old furniture, appliances, boxes, toys, etc.; discarded building materials; and equipment and materials stored on rooftops shall not be visible from public rights-of-way for more than three days.
- Structurally unsafe buildings, including but not limited to those with known fire hazards; faulty weather protection broken roofs; windows and doors; partially constructed structures when construction has ceased; unoccupied buildings that are left open; hazardous fences or walls; abandoned signs; and damaged buildings shall be demolished, removed, or fenced to prevent public access.
- Erosion, subsidence, and surface water problems within a property shall be abated.

Regulatory Setting, City of Commerce Arts in Public Places

The City of Commerce recently adopted *Division 23, Arts in Public Places*. This chapter is known as the *City of Commerce Art in Public Places Program*.³³ The intent of the Art in Public Places Program is to provide a collection of nationally recognized and permanent outdoor artwork throughout the City. The program is designed to present the community with a variety of artistic styles and themes, all of the highest possible quality. The requirements of this Program shall apply to commercial or industrial developments, having a project cost equal to or in excess of two hundred fifty thousand dollars.³⁴

Regulatory Setting, Light & Glare Requirements

The primary controls with respect to light and glare include specific sections of the *City of Commerce Municipal Code* that govern property maintenance and light trespass.³⁵ These regulations are identified in Section 19.19.130 [Light and Glare] of the City of Commerce Municipal Code. This section of the Municipal Code includes specific provisions regarding glare and light trespass.

This section states the following “No flickering or flashing lights shall be permitted in any residential or commercial zone. All lights shall be constant and shall not change intensity or color more often than once every thirty minutes” and “Lighting for advertising signs shall not cause *light* or glare on surrounding properties.”

³³ Commerce, City of. *City of Commerce Municipal Code*. Website accessed January 7, 2019.

³⁴ Commerce, City of. *City of Commerce Municipal Code. Division 23.– Arts in Public Places*. Website accessed December 8, 2018.

³⁵ Commerce, City of. *City of Commerce Municipal Code. Chapter 19.19, Section 19.19.130 – Light and Glare*. Website accessed December 8, 2016.

Existing Scenic Vistas

The project area is located in the midst of an urban environment with no notable topographical features in the vicinity. The overall topography of the project area is generally level. The San Gabriel Mountains are located approximately 13.0 miles to the north and are visible from the property on clear days. Other topographical feature in the area include the Montebello Hills located 4.4 miles to the northeast; the Puente Hills located 5.86 miles to the northeast; the Los Angeles River located 1.76 miles to the southwest; and the Rio Hondo River located 2.36 miles to the east. The San Gabriel Mountains, the Montebello Hills, and the Puente Hills are visible from some locations within the Planning Area.³⁶

The Planning Area is located within an urbanized area. The undeveloped parcels are found in Area 2 and Area 3 and were formerly developed and the buildings that previously occupied these sites have since been demolished. As a result, there are no significant natural features that remaining within the three areas. The dominant scenic resource in the area is the Citadel (Samson) façade. In early 1929, the architects Morgan Walls and Clements designed and constructed the Assyrian-themed Samson Tire and Rubber Co. factory. The factory was permanently closed in 1978. The City of Commerce acquired the Samson factory site for \$14 million in 1983. Seven years later, Trammell Crow Co. oversaw the \$118 million redevelopment of the site into an outlet center, as well as the construction of a 201-room Wyndham Garden Hotel next door. As part of the site's redevelopment, the main (south) wall elevation was preserved and integrated into the overall commercial development. In 1982, the California State Historical Resources Commission approved the wall's nomination to the National Register of Historic Places.

Visual Character/Quality of the Project Areas

The project area consists of urban development that includes a range of land uses and development consisting of commercial, industrial, warehousing, surface parking areas, and vacant land. The existing visual characteristics of the project area are summarized below:

- *Area 1* includes an area located within the existing Citadel shopping center complex consisting of approximately eight acres. The portion that will be developed with new hotel and retail uses within Area 1 is located within the northeast portion of the Citadel. These development sites are located more than 800 feet from the Telegraph Road and will be visually blocked by the Samson façade that extends along the Telegraph Road frontage. The development sites themselves are presently occupied by surface parking and two warehouses. These existing warehouses are located along the west side of Gaspar Avenue, south of Smithway Street.³⁷
- *Area 2* consists of approximately 26 acres and is located east of the existing Citadel complex and continuing easterly for an approximate distance of 2,100 feet.³⁸ Currently, Area 2 is occupied by three buildings, one of which is occupied and two are vacant. In addition, the easterly portion of

³⁶ Google Maps. <http://www.maps.google.com/maps>. Website accessed on January 7, 2019

³⁷ Blodgett Baylosis Environmental Planning. *Site Survey* (October 8, 2018 through January 7, 2019)

³⁸ Ibid.

Area 2 is ~~vacant~~ undeveloped and the buildings that formerly occupied the site have been demolished.

- Area 3 consists of approximately ten acres of land located on the northwest corner of Washington Boulevard and Telegraph Road. Washington Boulevard extends along the east side of Area 3 while Telegraph Road extends along the south side. The majority of the site is currently vacant though a single building occupied by a furniture outlet occupies the eastern portion of the site.³⁹

The aesthetic and visual characteristics of the existing land uses and development that occupy the three areas are summarized in Table 3-1.

Table 3-1
Summary of the Existing Uses and their Condition within the Project Area

Area	Use and Name	Address	Condition
Area 1	Surface Parking	NA	The parking area is in good condition
	Industrial Bldg., Unicorp & Uninex Intl.	5780 Smithway St.	The building and site are in good condition
	Industrial Bldg., (Unoccupied)	5788 Smithway St.	The building and site are in good condition
Area 2	Industrial Bldg., Justman Packaging	5819 Telegraph Rd.	The building and site are in good condition
	Industrial Bldg., Vacant Bldg.	2366 Travers Ave.	The building and site are in poor condition
	Industrial Bldg., Vacant Bldg.	5901 Telegraph Rd.	The building and site are in poor condition
	Vacant Land, Graded Earth	NA	The site is in poor condition
Area 3	Vacant Land, Graded Earth	NA	The site is in poor condition
	Commercial Bldg., Los Angeles Furn.	6241 Telegraph Rd.	The building and site are in fair condition

Source: Blodgett Baylosis Environmental Planning and Los Angeles County Tax Assessor

The existing development within the three areas total 190,243 square feet including 79,375 square feet in Area 1; 88,368 square feet in Area 2; and 22,500 square feet in Area 3. The existing vacant and undeveloped parcels within Area 2 and Area 3 were previously occupied by development that has since been demolished. The existing Citadel Outlet complex contains a variety of commercial retail, office, and hotel uses. The main Citadel complex, which contains both retail and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3). The existing conditions within the three Areas are illustrated in Exhibits 2-4 through 2-6 included herein in Section 2.

Existing Light and Glare

Light trespass is a form of light pollution that visually impacts light sensitive uses or activities (driving, sleeping, etc.). The most familiar example of light trespass is a floodlight which illuminates a neighbor's yard. Essentially, light trespass is unwanted spillover lighting. In addition to being irritating, it is also wasteful, and it contributes to the problem of light pollution. Light trespass is most commonly caused by

³⁹ Blodgett Baylosis Environmental Planning. *Site Survey* (October 8, 2018 through January 7, 2019)

individual light fixtures though it can also be caused by poorly directed outdoor lighting, ambient building lighting, and other sources.

Existing lighting in the Planning Area includes street lighting along Telegraph Road and Washington Boulevard, parking area lighting, and signage. A substantial amount of light is generated by free-standing digital signs located along the Citadel's southern property line. These are digital signs that produce vivid images that are visible from the I-5 freeway. The freestanding Commerce Casino sign is an additional source of light, though this sign is typically lit during the evening hours. Glare is the reflection of light (sunlight, headlights, lamps, etc.) on reflective surfaces. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land uses or a driver's vision.

Light Sensitive Land Uses

The nearest light sensitive land uses include the Rosewood Park residential neighborhood. This neighborhood is located to the south of the I-5 freeway, extending from Eastern Avenue on the west to Boris Avenue to the east. The digital signage located within the Citadel complex; the Citadel's multi-level above-ground parking garage; the Double Tree hotel, and the Commerce Casino are all visible from the aforementioned residential neighborhood.⁴⁰

3.1.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce and Appendix G of the CEQA Guidelines, a project will normally be deemed to have a significant adverse aesthetic environmental impact on aesthetics if it results in the following:

- The proposed project's potential for an adverse effect on a scenic vista;
- The proposed project's potential for substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- The proposed project's potential for substantial degradation of the existing visual character or quality of the site and its surroundings; or,
- The proposed project's potential for creating a new source of substantial light and glare that would adversely affect day or night-time views in the area.

⁴⁰ Blodgett Baylosis Environmental Planning. *Site Survey* (October 8, 2018 through January 7, 2019)

3.1.4 ENVIRONMENTAL IMPACTS

3.1.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR AN ADVERSE EFFECT ON A SCENIC VISTA.

DISCUSSION OF IMPACT ANALYSIS

The greatest visual change associated with the proposed project's implementation involves the elimination of the existing older buildings and/or undeveloped properties and their replacement with a new building.⁴¹ The nearest homes to the project site are located approximately 250 feet from Area 2, 860 feet from Area 3, and 1,280 feet from Area 1. These homes are generally located to the southwest of the project site on the south side of the Santa Ana Freeway. The proposed new development within Area 1 through 3 will not obstruct views of the significant physiographic features (the San Gabriel Mountains, the Montebello Hills, and the Puente Hills) from the homes located within the Rosewood neighborhood. The views from the residences are presently restricted by the existing development within the area and the sound walls that extend along the south side of the Santa Ana Freeway.

Overall, the proposed project's implementation will improve the overall visual and aesthetic quality of those properties located along the north side of the Telegraph Road corridor. The existing underutilized properties within Areas 2 and 3 consisting of vacant building and undeveloped properties will undergo development with new commercial buildings. The existing underutilized and dilapidated parcels within Area 2 and Area 3 will be improved with new development and landscaping.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in significant impacts to scenic resources.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant adverse impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in any significant adverse unmitigable aesthetic impacts on a scenic vista.

3.1.4.2 THE PROPOSED PROJECT'S POTENTIAL FOR SUBSTANTIAL DAMAGE TO SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS WITHIN A STATE SCENIC HIGHWAY.

DISCUSSION OF IMPACT ANALYSIS

There are no designated State scenic highways located in the vicinity of the project site.⁴² In addition, there are no City-designated scenic highways in Commerce. The new buildings will include architectural

⁴¹ California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov

⁴² Ibid.

features that will improve the Planning Area's appearance along the Telegraph Road and Washington Boulevard frontages. In addition, the proposed project will not affect any trees, outcroppings, or historic resources. The project sites have already undergone development and there are no natural topographic features remaining.⁴³

Demolition and construction activities would result in short-term, temporary changes in visual character as the project site transitions from its existing uses to the proposed future uses. All of the existing buildings and improvements onsite within the three Areas would be removed and the site would be graded. To screen views of the project site during construction, mitigation requiring the Applicant to erect a temporary barrier along public street frontages (Washington Boulevard and Telegraph Road) that adjoin the project site is required. The barriers would consist of material (wood, fabric, vinyl, etc.) that would serve to screen views of demolition and construction activities from public view. In addition, the barrier would be required to incorporate graffiti-resistant properties to prevent vandalism. With the implementation of this mitigation measure, impacts would be reduced to a level of less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project may result in potential significant impacts during the demolition, grading, and construction phases of development. As a result, mitigation is required.

MITIGATION OF POTENTIAL IMPACTS

The following mitigation is required to address potential negative impacts during demolition, grading, and construction phases.

Mitigation Measure 1 (Scenic & Visual Impacts). Prior to demolition activities, the project applicant shall erect a temporary construction barrier along public street frontages that adjoin the Areas 2 and 3 along Washington Boulevard and Telegraph Road. The barrier shall consist of material (wood, fabric, vinyl, etc.) that screens off-site views of the project site from the public right-of-way. The screen wall must also employ graffiti-resistant materials/properties. The barrier shall remain in place until building construction activities complete.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project, following mitigation, would not result in substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

⁴³ Blodgett Baylosis Environmental Planning. Site Survey. (October 8, 2018 through January 7, 2019).

3.1.4.3 THE PROPOSED PROJECT'S POTENTIAL FOR SUBSTANTIAL DEGRADATION OF THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS.

DISCUSSION OF IMPACT ANALYSIS

The proposed new development within the three areas (Area 1, Area 2, and Area 3) will have a total floor area of 1,007,202 square feet. The new development will consist of approximately 237,662 square feet of retail uses; 358,000 square feet of hotel uses totaling 770 rooms; 270,000 square feet of theater, entertainment, and recreation uses; 16,540 square feet of food serving uses, 70,000 square feet of office uses, and 55,000 square feet of industrial uses.

Area 1 includes an area located within the existing Citadel shopping center complex. The dominant new visual elements proposed as part of the Area 1 development include the following:⁴⁴

- The *Parking Structure* will consist of four levels and provide total of approximately 750 parking spaces. The new five-level parking structure will be constructed below the two hotel buildings.
- *Traveler's Hotel* will be constructed in the northeast portion of the Phase 5 area. This five-level hotel will contain approximately 174 guest rooms. The maximum combined height of the hotel and parking structure will be approximately 150 feet above grade.
- *Loft Hotel* will be constructed south of the Traveler's Hotel though this five level hotel building will also be constructed over the parking structure and will have a maximum height of approximately 150 feet above grade.
- *A New/Expanded Parking Structures* will be constructed in the southern portion of Area 1. The new parking structure will consist of six levels and will contain 630 stalls.
- Other aesthetic and visual improvements that will be located in Area 1 include a new Grand Fountain Plaza, artwork, decorative lighting, and landscaping.

The dominant visual and architectural elements for Area 2 include the following:⁴⁵

- A *Recreational Commercial* use (referred to as an "Adventure Experiential Retail"), consisting of two levels and 120,000 square feet of floor area, will be centrally located within Area 2.
- A new *Hotel and Parking Structure* will be located in the northeastern portion of Area 2. The new parking structure will consist of four parking levels that will accommodate approximately 700 parking spaces. A new hotel, consisting of nine floors, will be constructed over the parking structure and will contain approximately 500 guest rooms.

⁴⁴ Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018.

⁴⁵ Ibid.

- A *Movie/Entertainment Complex* will consist of three levels and will include approximately 150,000 square feet of floor area.
- A 150-foot tall design element (referred to as an Icon Tower) will be situated near the theater building's southeast corner.

Area 3 consists of approximately ten acres of land located on the northwest corner of Washington Boulevard and Telegraph Road.⁴⁶ The new elements that are proposed as part of the Area 3 development are outlined below.

- *Fast Food Restaurant Pads* totaling between four to five drive through restaurants will be constructed in Area 3. As an alternative, one of the five drive-through restaurant pads will be developed as a four level, 70,000 square foot office building that may be a public/institutional use instead.
- A new *Warehouse/Industrial Building* will be located in the northwest portion of Area 3. This building will have a total floor area of approximately 55,000 square feet.

The proposed improvements will not physically change the existing Citadel (Samson) wall that extends along the Telegraph Road frontage of Area 1. These larger project elements and their potential visual impact are summarized below in Table 3-2. The larger project elements are also illustrated in Exhibit 3-1.

Table 3-2
Summary of Major Visual Elements

Area	Project Element	Description
Area 1	Traveler's Hotel	Five level, 174 room hotel constructed over the parking structure.
	Loft Hotel	Five level, 96 room hotel constructed over the parking structure.
	Parking Structure	Four level parking structure containing 750 spaces, constructed below hotels.
	New Parking Structure	Six level parking structure containing 680 spaces.
Area 2	Recreation/Commercial Bldg.	Two level, 120,000 sq. ft. adventure experiential commercial.
	Hotel	Nine levels over the parking structure with 500 guest rooms.
	Icon Tower	150 ft. tall Icon Tower next to the Entertainment Complex.
	Entertainment Complex	Three level theater building (150,000 sq. ft.) and supporting restaurant uses.
	Parking Structure	Four level parking structure (700 spaces) below the hotel.
Area 3	<u>Restaurant uses or Office Uses</u>	Four level, 70,000 sq. ft. building that may be a public/institutional use.
	Warehouse/Industrial	Industrial building, 55,000 sq. ft., with seven loading docks.

Source: Studio Progetti. *A Project of Craig Realty Group. [The] Citadel.* November 21, 2018

⁴⁶ Studio Progetti. *A Project of Craig Realty Group. [The] Citadel.* November 21, 2018..



Views of Area 1 and Area 2 looking northwest.



View of Area 2 looking north.

EXHIBIT 3-1
BUILDING HEIGHT & MASSING ILLUSTRATION
Source: Studio Progetti, Inc.

The building design and landscape design concept for the proposed Citadel Outlets Expansion Project is conceptually illustrated in Exhibit 3-2. The building design and landscaping requirements for the proposed project will comply with the City of Commerce Municipal Code requirements. The parking lot area will provide landscaping along the perimeter as well as within interior areas. In particular, the development concept will include the planting of trees throughout the center. Shrubs and bark mulch groundcover would be incorporated into the landscape design where applicable. In addition, the developer will install City-approved landscaping along the Telegraph Road and Washington Boulevard road frontages.

The proposed project's implementation would involve the removal of the existing older buildings within Area 2 and Area 3 and their replacement with more visually appealing contemporary commercial uses. The proposed Development Agreement and adherence to other City requirements would regulate the development of the complex. This will ensure that the future development achieves a cohesive, compatible design in terms of architecture, landscaping, and signage. The change in the area's visual characteristics is anticipated to be positive, since the existing unappealing visual attributes within Areas 2 and 3 would be eliminated and replaced with a modern commercial development. As a result, the impacts would be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts on scenic resources.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant visual impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in substantial degradation of the existing visual character or quality of the site and its surroundings.

3.1.4.4 THE PROPOSED PROJECT'S POTENTIAL FOR CREATING A NEW SOURCE OF SUBSTANTIAL LIGHT AND GLARE THAT WOULD ADVERSELY AFFECT DAY OR NIGHT-TIME VIEWS IN THE AREA.

DISCUSSION OF IMPACT ANALYSIS

New sources of light trespass emanating from the project areas will include indoor and outdoor lighting, illumination from new signage, and headlights on the monorail. However, this lighting will not significantly impact nearby light sensitive uses due to the distance between the sensitive receptors and the new development. Additional outdoor lighting will be incorporated into the project; with a majority of this lighting located in the parking areas. Three new freestanding LED signs will be installed along the north side of Telegraph Road within Area 2. The LED intensity will be adjustable as a means to prevent glare.

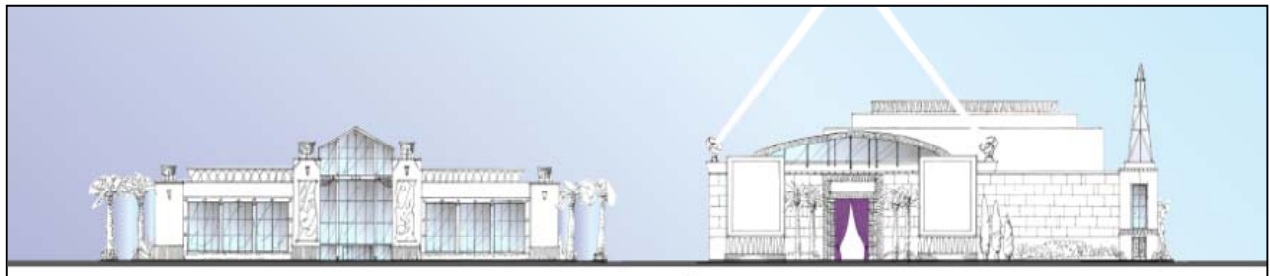


EXHIBIT 3-2
CONCEPTUAL ARCHITECTURAL DESIGN
Source: Studio Progetti, Inc.

Light spillover from the parking area lighting will not affect the residential units located south of the I-5 Freeway because this light spillover will be attenuated by the wall that extends along the Citadel's southern property line. Future light radiating from light fixtures located in Area 2 will be obstructed by the sound wall that extends along the south side of the I-5 Freeway. Outdoor light fixtures placed in Area 3 will not emit light capable of creating an impact on nearby sensitive receptors since no sensitive land uses have a line of sight with Area 3. Lighting from vehicle headlights travelling down Telegraph Road will not be visible from the aforementioned residential neighborhood due to the presence of the aforementioned walls.

Light sensitive land uses (single-family units) are located south of the project site along the south side of the I-5 freeway. Lighting is not expected to impact these light sensitive receptors due to their distance from the project site, the presence of the wall extending along the Citadel's southern property line, and the presence of a sound wall located along the south side of the I-5.⁴⁷ Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. The architectural plans call for inset and shaded window treatments and the use of non-reflective glass. As a result, no glare-related impacts are anticipated.

A total of three new freestanding LED signs will be installed along the southern portion of Area 2. These signs will display digital images similar to those produced by the signs located along the southern portion of the Citadel. Additional mitigation is provided to minimize potential impacts related to glare and the operation of the LED signs.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

Glare may affect future residents as well as drivers travelling along I-5, Washington Boulevard, and Telegraph Road. Therefore, mitigation is required to minimize glare.

MITIGATION OF POTENTIAL IMPACTS

To further reduce the potential for spill-over lighting and glare, the following mitigation will be required:

Mitigation Measure 2 (Light & Glare Impacts). The Applicant must also submit an exterior lighting plan for review and approval by the Public Works and Development Services Department prior to the issuance of building permits.

Mitigation Measure 3 (Light & Glare Impacts). The three new LED digital signs proposed for Area 2 must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver. The LED signs must be designed to freeze the display in one static position, display a full black screen, or turn off, in the event of a malfunction. The proposed displays (all levels) must be fully dimmable, and must be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day. Finally, the LED signs will be prohibited from displaying any red, blinking, or intermittent light likely to be mistaken for warning or danger signals.

⁴⁷ Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on November 16, 2018.

Mitigation Measure 4 (Light & Glare Impacts). All buildings, parking structures, and signage within the project areas must be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass.

The aforementioned mitigation will reduce the potential aesthetic impacts to levels that are less than significant.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, with the implementation of the required mitigation.

3.2 AIR QUALITY IMPACTS

This section describes the existing air quality setting and potential effects from project implementation. The analysis considered the air quality impacts associated with construction activities as well as the long term operational impacts. The air quality analysis worksheets are provided in Appendix A of Appendices Volume 1 under a separate cover.

3.2.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental analysis undertaken as part of the Initial Study's preparation indicated the EIR should evaluate the following issues:

- The proposed project's potential for conflicting with or obstructing the implementation of the applicable air quality plan;
- The proposed project's potential for violating any air quality standard or contributing substantially to an existing or projected air quality violation;
- The proposed project's potential for resulting in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors);
- The proposed project's potential for exposing sensitive receptors to substantial pollutant concentrations; and,
- The proposed project's potential for creating objectionable odors affecting a substantial number of people.

3.2.2 ENVIRONMENTAL SETTING

Definition of Criteria Air Pollutants

The focus of the air quality analysis provided herein is related to the potential emissions of criteria pollutants associated with future development arising as part of the proposed project's construction and subsequent operation. The criteria pollutants of special concern include the following:

- *Ozone (O₃)* is a nearly colorless gas that irritates the lungs and damages materials and vegetation. O₃ is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)*, a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain, is produced by the incomplete combustion of hydrocarbon fuels.

- *Nitrogen dioxide (NO₂)* is a yellowish-brown gas that, at high levels, can cause breathing difficulties. NO₂ is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. NO_x emissions are also a concern because of their contribution to the formation of O₃ and particulate matter.
- *Sulfur dioxide (SO₂)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- *PM₁₀* refers to particulate matter less than ten microns in diameter. PM₁₀ causes a greater health risk than larger-sized particles, since fine particles can more easily cause respiratory irritation.

The sources and potential health effects of the criteria pollutants are summarized in Table 3-3.

Table 3-3
Primary Sources and Effects of Criteria Pollutants

Pollutants	Emissions Source	Health Effects
Sulfur Dioxide (SO ₂)	<ul style="list-style-type: none"> • Combustion of sulfur fossil fuels • Smelting of sulfur-bearing metal ores • Industrial processes 	<ul style="list-style-type: none"> • Irritation of eyes • Aggravation of respiratory diseases (asthma, emphysema)
Carbon Monoxide (CO)	<ul style="list-style-type: none"> • Incomplete combustion of fuels and other carbon-containing substances 	<ul style="list-style-type: none"> • Irritation of eyes • Aggravation of respiratory diseases (asthma, emphysema)
Nitrogen Dioxide (NO ₂)	<ul style="list-style-type: none"> • Motor vehicle exhaust • High-temperature stationary combustion 	<ul style="list-style-type: none"> • Aggravation of respiratory illness
Ozone (O ₃)	<ul style="list-style-type: none"> • Atmospheric reaction of organic gases with nitrogen oxides in sunlight 	<ul style="list-style-type: none"> • Irritation of eyes • Aggravation of respiratory & cardiovascular diseases
Fine Particulate Matter (PM ₁₀)	<ul style="list-style-type: none"> • Stationary combustion of solid fuels • Construction activities • Industrial processes 	<ul style="list-style-type: none"> • Increased cough & chest discomfort • Aggravation of respiratory & cardio-respiratory diseases

Source: South Coast Air Quality Management District.

Regulatory Setting - Federal and State Clean Air Regulations

The *Environmental Protection Agency (EPA)* is the lead Federal Agency charged with the implementation and enforcement of the Clean Air Act. As part of this effort, the EPA is responsible for the establishment of national ambient air quality standards (referred to herein as the *Federal Standards*). The EPA also regulates mobile emission sources that include automobiles, trucks, aircraft, and recreational vehicles.⁴⁸ Specific National ambient air quality standards (AAQS) have been promulgated by the Federal government and the California Air Resources Board (CARB) has also established ambient air quality standards for some of the pollutants regulated by the Federal government (refer to Table 3-4).

The EPA established National Ambient Air Quality Standards (NAAQS) ambient air quality standards for the following air pollutants: ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide

⁴⁸ Automobiles sold in California must meet the stricter emission standards established by the California Air Resources Board.

(SO₂), lead (Pb), particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). The CARB has also established ambient air quality standards for six of the aforementioned pollutants regulated by the EPA. Some of the California ambient air quality standards are more stringent than the national ambient air quality standards. In addition, California has established ambient air quality standards for the following: sulfates, vinyl chloride, and visibility. Table 3-4 lists both the current California ambient air quality standards (AAQS), ~~and the Federal AAQS for each criteria pollutant, and the corresponding attainment status in meeting the State and Federal air standard.~~

Table 3-4
National and California Ambient Air Quality Standards and Attainment Status

Pollutants	National Standards	State Standards
Lead (Pb)	1.5 µg/m ³ (calendar quarter) <i>Non-attainment (LA County)</i>	1.5 µg/m ³ (30-day average) <i>Non-attainment (LA County)</i>
Sulfur Dioxide (SO ₂)	0.14 ppm (24-hour) <i>Attainment</i>	0.25 ppm (1-hour) 0.04 ppm (24-hour) <i>Attainment</i>
Carbon Monoxide (CO)	9.0 ppm (8-hour) 35 ppm (1-hour) <i>Attainment (Maintenance)</i>	9.0 ppm (8-hour) 20 ppm (1-hour) <i>Attainment</i>
Nitrogen Dioxide (NO ₂)	0.053 ppm (annual average) <i>Attainment (Maintenance)</i>	0.25 ppm (1-hour) <i>Attainment</i>
Ozone (O ₃)	0.12 ppm (1-hour) <i>No Standard</i> 0.12 ppm (8-hour) <i>Non-attainment Extreme</i>	0.09 ppm (1-hour) <i>Non-attainment</i> 0.12 ppm (8-hour) <i>Non-attainment</i>
Fine Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hour) <i>Attainment (Maintenance)</i>	50 µg/m ³ (24-hour) <i>Non-attainment</i>
Fine Particulate Matter (PM _{2.5})	35 mg/m ³ (24-hour) <i>Non-attainment (serious)</i> 12 mg/m ³ (annual) <i>Non-attainment (Serious)</i>	12.0 mg/m ³ (Annual) <i>Non-attainment</i>
Sulfate	None	25 µg/m ³ (24-hour)
Visual Range	None	10 miles (8-hour) w/humidity < 70%

Regulatory Setting – SCAQMD Thresholds and Regulations

The *South Coast Air Quality Management District (SCAQMD)* has jurisdiction over a 10,743 square-mile area that includes Orange County, Los Angeles County (except for Antelope Valley), the non-desert portion of western San Bernardino County, and western Riverside County. The SCAQMD is responsible for the implementation of the protocols of the Federal Clean Air Act. In addition, the SCAQMD is responsible for ensuring that the more stringent California Clean Air standards are met. The SCAQMD is responsible for the formulation and implementation of a long-range plan referred to as the Air Quality Management Plan

or AQMP that indicates how these objectives will be met. Projects in the South Coast Air Basin (SCAB) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

The proposed project would have a significant long-term impact on air quality if any of the operational emission significance thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.⁴⁹

The SCAQMD has also adopted a number of regulations that effectively implement the District's efforts to improve air quality in the SCAB. These regulations that are the most relevant to the proposed project's construction and subsequent operation are outlined below.⁵⁰

- *SCAQMD Rule 402* prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- *SCAQMD Rule 403* governs fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source.

⁴⁹ South Coast Air Quality Management District. *Final 2016 Air Quality Plan [AQMP]*. Adopted March 2017.

⁵⁰ South Coast Air Quality Management District. *SCAQMD Rule Book*. Website accessed on January 8, 2019. <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

- *SCAQMD Rule 481* applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the specific conditions are met.
- *SCAQMD Rule 1108* governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule would regulate the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the project must comply with SCAQMD Rule 1108.
- *SCAQMD Rule 1113* governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. As of January 1, 2014, VOC content in architectural coatings will be limited to no more than 50 grams per liter. Therefore, all paints and solvents used during construction of the project must comply with SCAQMD Rule 1113.
- *SCAQMD Rule 1143* governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction.
- *SCAQMD Rule 1186* limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.
- *SCAQMD Rule 1303* governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM₁₀ among other pollutants.
- *SCAQMD Rule 1401*, New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants (TACs).

Regulatory Setting - Local (City of Commerce) General Plan

The City of Commerce 2020 General Plan addresses air quality within the City in the Air Quality Element. This Element includes specific policies aimed improving Air Quality in the City. These policies include devising strategies that promote the co-existence of sensitive receptors and industrial uses; reducing automobile emissions; and promoting the use of alternative fuels. Those policies that are relevant to the proposed project are identified below.⁵¹

⁵¹ Commerce, City of. *City of Commerce 2020 General Plan, Section 8 Air Quality Element*. January 2008

- *Air Quality [Element] Policy 1.2.* The City of Commerce will encourage the applicants for sensitive land uses (e.g., residences, schools, daycare centers, playgrounds and medical facilities) to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential impacts of air pollution on sensitive receptors.
- *Air Quality [Element] Policy 1.3.* The City of Commerce will promote and support mixed-use land patterns that allow the integration of retail, office, institutional and residential uses. Consult with the AQMD when siting new facilities with dust, odors or TAC emissions to avoid siting those facilities near sensitive receptors and avoid siting sensitive receptors near sources of air pollution.
- *Air Quality [Element] Policy 1.4.* The City of Commerce will facilitate communication among residents, businesses, and the AQMD to quickly resolve air pollution nuisance complaints. The City will distribute information to advise residents on how to register a complaint with the SCAQMD.
- *Air Quality [Element] Policy 1.5.* The City of Commerce will require that owners of new developments that have the potential to emit air pollutants that would impact sensitive receptors to notify residents and businesses adjacent to the proposed site prior to starting construction.
- *Air Quality [Element] Policy 2.1.* The City of Commerce will require that developers of high density and mixed-use developments consult with the local transit agency and incorporate all appropriate and feasible transit amenities into the plans.
- *Air Quality [Element] Policy 2.6.* The City of Commerce will design safe and efficient vehicle access to commercial land uses from arterial streets to ensure efficient vehicular ingress and egress.
- *Air Quality [Element] Policy 2.7.* The City of Commerce will promote mass transit ridership through careful planning of routes, headways, origins and destinations, and types of vehicles
- *Air Quality [Element] Policy 2.8.* The City of Commerce will seek new cooperative relationships between employers and employees to reduce vehicle miles traveled (VMT).
- *Air Quality [Element] Policy 2.9.* The City of Commerce will work with large employers and commercial/industrial complexes to create Transportation Management Associations and to implement trip/VMT action strategies.
- *Air Quality [Element] Policy 2.11.* The City of Commerce will collaborate with local transit agencies to develop programs and educate employers about employee rideshare and transit.
- *Air Quality [Element] Policy 2.12.* The City of Commerce will identify and develop non-motorized transportation corridors (e.g., bicycling and pedestrian trails and lanes).
- *Air Quality [Element] Policy 2.13.* The City of Commerce will establish requirements for special event centers to provide off-site parking and park-n-ride facilities at remote locations. Remote

parking should be as close as practicable to the event site and the operator should operate or provide alternative-fuel vehicles for shuttles.*

- *Air Quality [Element] Policy 2.14.* The City of Commerce will encourage special event center operators to provide discounted transit passes with event tickets or offer discounted on-site parking for carpooling patrons (four or more persons per vehicle).
- *Air Quality [Element] Policy 4.1.* The City of Commerce will synchronize traffic signals throughout the city and with adjoining cities and counties while allowing free flow of mass transit systems.
- *Air Quality [Element] Policy 4.3.* The City of Commerce will encourage businesses to schedule deliveries at off-peak traffic periods through the land use entitlement or business regulation process.
- *Air Quality [Element] Policy 4.6.* The City of Commerce will work with local transit providers to incorporate best design practices for transit into new development projects.

Regional Climate

Commerce is located in the South Coast Air Basin (SCAB) of California, a 6,600 square-mile area that encompasses Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Winters within the SCAB are mild and frost is rare, as temperatures seldom fall below 28° F.

Meteorological data for downtown Los Angeles between 1918 and 2005 may best characterize the local climate. During this period, the average annual maximum temperature was 74.1° F and the average annual minimum temperature was 55.9° F. The average annual daytime temperatures in the City ranged from 55.4° F to 83.2° F, with temperatures often exceeding 100° F during the summer months. Annual rainfall in the area averaged 14.95 inches during the measurement period between 1918 and 2005 though the region has experienced a prolonged drought in the early years of the current decade. The SCAB, in general, has not attained national or State standards for ozone or PM₁₀.⁵²

Local Air Quality

The City is located approximately 17 miles from the Pacific Ocean and enjoys the moderating influences of the ocean.⁵³ Local meteorological conditions (such as light winds and shallow vertical mixing) and topographical features (such as the local mountains) create areas of high pollutant concentrations by hindering dispersal. Temperature inversions created by a semi-permanent subtropical high-pressure cell over the Pacific Ocean also hinder dispersion by trapping cool air from the ocean near the ground with warm air from the inland areas.⁵⁴ Ambient air quality in the City may be characterized by readings taken

⁵² South Coast Air Quality Management District. *CEQA Air Quality Handbook*. <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>

⁵³ South Coast Air Quality Management District. *Air Pollution and Meteorology*. May 2017.

⁵⁴ Ibid.

from the monitoring station located in Receptor Area 5 (Station No. 84) in the City of Pico Rivera. Overall air quality has improved since 2000.

Air quality within the SCAB has shown a steady improvement since monitoring was initiated and the ozone concentrations are no exception. The maximum 1-hour ozone concentration in the SCAB measured in 2002 was the lowest concentration since monitoring began. Ozone concentrations still exceed both the State and Federal clean air standards in some areas of the SCAB though the urbanized area of Los Angeles County has not experienced an exceedance of either Federal or State ozone standards. The exceedances were recorded in the San Bernardino Mountains and the Santa Clarita area. The SCAQMD's air quality data indicates that during the past few years, the project area has exceeded the ozone, PM₁₀, and PM_{2.5} standards.⁵⁵ Currently, the SCAB region is not in attainment of the ozone and PM_{2.5} standards. The AQMP provides the latest control strategies to achieve attainment as expeditiously as practicable.

The City of Commerce has a history of poor air quality. The City contains four railroad yards totaling 530 acres. People who live in the Bandini and Ayers-Leonis neighborhoods, near the rail yards in Commerce, are more likely to develop respiratory disease compared to other people living elsewhere in Los Angeles County.⁵⁶ In addition, residents are exposed to substantial criteria pollutant emissions released from vehicles and trucks travelling down I-5, I-710, Telegraph Road, Washington Boulevard, and other congested streets.

Sensitive Receptors

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality. Sensitive receptors typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate. These population groups are generally more sensitive to poor air quality.⁵⁷ Sensitive receptors located near the project site include the following: the single-family residential neighborhood located along the south side of the I-5 freeway and Rosewood Park School, located 222 feet to the southwest and Rosewood Park, located 267 feet to the southwest. The park and the school are also located south of the I-5.

3.2.3 THRESHOLDS OF SIGNIFICANCE

According to the Commerce and Appendix G of the CEQA Guidelines, a project will normally be deemed to have a significant adverse environmental impact on air quality, if it results in any of the following:

- The proposed project's potential for conflicting with or obstructing the implementation of the applicable air quality plan;
- The proposed project's potential for violating any air quality standard or contributing substantially to an existing or projected air quality violation;

⁵⁵ South Coast Air Quality Management District. Air Quality Data. <http://www.aqmd.gov/home/air-quality/air-quality-data-studies>

⁵⁶ Ibid.

⁵⁷ South Coast Air Quality Management District. *CEQA Air Quality Handbook*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>

- The proposed project's potential for resulting in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors);
- The proposed project's potential for exposing sensitive receptors to substantial pollutant concentrations; and,
- The proposed project's potential for creating objectionable odors affecting a substantial number of people.

3.2.4 ENVIRONMENTAL IMPACTS

3.2.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR CONFLICTING WITH OR OBSTRUCTING THE IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN.

DISCUSSION OF IMPACT ANALYSIS

Measures to improve regional air quality are outlined in the SCAQMD's Air Quality Management Plan (AQMP).⁵⁸ The most recent AQMP was adopted in 2017 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).⁵⁹ The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Key elements of the AQMP include enhancements to existing programs to meet the 24-hour PM_{2.5} Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM_{2.5} and Ozone.

Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP:⁶⁰

- *Consistency Criteria 1* refers to a proposed project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.
- *Consistency Criteria 2* refers to a proposed project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.⁶¹

⁵⁸ South Coast Air Quality Management District. *CEQA Air Quality Handbook*. <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>

⁵⁹ Ibid.

⁶⁰ Ibid.

⁶¹ Ibid.

In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions will exceed the levels that the SCAQMD considers to be a significant adverse impact (refer to the analysis included in the next section). However, these exceedances will be mitigated to the fullest extent possible. The proposed project will also conform to Consistency Criteria 2 since it will not significantly affect any regional population, housing, and employment projections prepared for the City of Commerce. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Comprehensive Plan (RCP) prepared by the Southern California Association of Governments (SCAG) are considered consistent with the AQMP growth projections, since the RCP forms the basis of the land use and transportation control portions of the AQMP.

According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Commerce is projected to add a total of 4,500 jobs through the year 2040.⁶² A total of 1,750 new jobs will be created by the proposed project (a detailed breakdown of the potential employment generation is provided herein in Section 3-10). The number of jobs that will be created is well within SCAG's employment projections for the City. In addition, the project may aid in reducing citywide unemployment, which currently stands at 4.1% as of December 2018. The current 2019 unemployment rate for the City of Commerce is 5.8%, which translates into 300 local residents actively seeking work. The corresponding figures for surrounding communities including Bell (600 unemployed persons or an unemployment rate of 4.2%); Bell Gardens (700 unemployed persons or an unemployment rate of 4.8%); Maywood (500 unemployed persons or an unemployment rate of 3.7%); East Los Angeles (3,800 unemployed persons or an unemployment rate of 6.6%); and Montebello (1,200 unemployed persons or an unemployment rate of 4.2%). Within these five adjacent communities, there are a total of 6,800 persons actively seeking work.⁶³

The existing Citadel Outlets Center and the other expansion areas (Area 1, Area 2, and Area 3) are located within the Town Center Planning Area identified in the adopted City of Commerce General Plan.⁶⁴ The Town Center Planning Area includes the great majority of that portion of the City that is located north of the Santa Ana Freeway (excluding the residential neighborhood that extends along the south side of Ferguson Drive). The land use policy for the Town Center Planning Area recognized commercial importance of Telegraph Road corridor by stating the following:

"...[The Town Center] planning area supports both commercial and industrial land uses. However, the tremendous freeway exposure available to the Telegraph Road corridor offers a multitude of opportunities for higher-intensity office and service/retail/highway commercial uses. ...The Citadel development serves as the area's visual focal point, continuing eastward, in the area generally bounded by Tubeway Avenue, the Santa Ana Freeway, and the city's eastern and northern borders."

⁶² Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040*. Adopted on April 7, 2016. <http://scagrtpscsc.net/Documents/2016/final/f2016RTPSCS.pdf>

⁶³ California, State of. *Employment Development Department (EDD). Local Labor Market Information*. January 30, 2019. <https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html>

⁶⁴ Commerce, City of. *City of Commerce General Plan*. Exhibit 2-2 City Map and Planning Areas. Page 32.

The City's General Plan goes on to state that the "Telegraph Road corridor should become a high intensity, high-visibility office/hotel/restaurant commercial corridor. Foremost, the Citadel Center and the adjacent properties will support uses that not only provide long-term economic benefits to the City, but that also spur development of related office, commercial, and entertainment-related uses within the area."⁶⁵

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project would not result in have a significant adverse impact related to conformity with an applicable AQMP.

MITIGATION OF POTENTIAL IMPACTS

No mitigation will be required since no significant impacts related to a conflict with the applicable AQMP was identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential for conflicting with or obstructing the implementation of the applicable AQMP.

3.2.4.2 THE PROPOSED PROJECT'S POTENTIAL FOR VIOLATING ANY AIR QUALITY STANDARD OR CONTRIBUTING SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION.

DISCUSSION OF IMPACT ANALYSIS

The proposed project within the three areas will allow for the construction to occur in phases. Work on Area 3 will commence in 2019-2020 with individual businesses starting to open in 2020. Work on Area 1 will begin in 2020-2021. Finally, Area 2 (Phase 6) will be developed once Area 1 is open for business with construction for Area 2 beginning in 2024.

The potential criteria pollutant air emissions may be placed into the following two categories: short-term (construction-related) emissions and long-term (operational) emissions. The estimated daily construction emissions (shown in Table 3-5) assume compliance with applicable SCAQMD rules and regulations for the control of fugitive dust and architectural coating emissions, which include, but are not limited to, the watering of active grading areas within the site and unpaved surfaces at least three times daily, daily clean-up of mud and dirt carried onto paved streets from the site, and the use of low VOC containing paint. Table 3-5 indicated the total anticipated construction emissions for each of the three Area's future development. The CalEEMod V.2016.3.2 model represents a worst case with no mitigation used. The mitigation would involve regular watering of barren soils pursuant to Rule 403. The use of low VOC paints is also required by the SCAQMD which would further reduce ROG emissions.

⁶⁵ Commerce, City of. *City of Commerce 2020 General Plan, Section 3 Community Development Element*. January 2008

Table 3-5
Estimated Daily Construction Emissions (unmitigated pounds/day)

Construction Phase	ROG	NO ₂	CO	SO ₂	PM ₁₀	PM _{2.5}
Area 1 Construction Emissions						
Demolition (on-site) <i>Area 1</i>	<u>3.16</u>	<u>31.44</u>	<u>21.56</u>	<u>0.03</u>	<u>5.27</u>	<u>2.00</u>
Demolition (off-site) <i>Area 1</i>	<u>0.06</u>	<u>0.04</u>	<u>0.56</u>	--	<u>0.16</u>	<u>0.04</u>
Total Demolition <i>Area 1</i>	3.22	31.48	22.12	0.03	5.43	2.04
Site Preparation (on-site) <i>Area 1</i>	<u>3.88</u>	<u>40.49</u>	<u>21.15</u>	<u>0.03</u>	<u>20.11</u>	<u>11.81</u>
Site Preparation (off-site) <i>Area 1</i>	<u>0.07</u>	<u>0.04</u>	<u>0.67</u>	--	<u>0.20</u>	<u>0.05</u>
Total Site Preparation <i>Area 1</i>	3.95	40.53	21.82	0.03	20.31	11.86
Grading (on-site) <i>Area 1</i>	<u>4.19</u>	<u>46.39</u>	<u>30.87</u>	<u>0.06</u>	<u>25.87</u>	<u>7.06</u>
Grading (off-site) <i>Area 1</i>	<u>0.08</u>	<u>0.05</u>	<u>0.75</u>	--	<u>0.22</u>	<u>0.06</u>
Total Grading <i>Area 1</i>	4.27	46.44	31.62	0.06	26.09	7.12
Building Construction (on-site) <i>Area 1</i>	<u>1.70</u>	<u>15.61</u>	<u>16.36</u>	<u>0.02</u>	<u>0.80</u>	<u>0.76</u>
Building Construction (off-site) <i>Area 1</i>	<u>5.51</u>	<u>42.73</u>	<u>47.80</u>	<u>0.22</u>	<u>15.29</u>	<u>4.22</u>
Total Building Construction <i>Area 1</i>	7.21	58.34	64.16	0.24	16.09	4.98
Paving (on-site) <i>Area 1</i>	<u>1.10</u>	<u>11.12</u>	<u>14.58</u>	<u>0.02</u>	<u>0.56</u>	<u>0.52</u>
Paving (off-site) <i>Area 1</i>	<u>0.05</u>	<u>0.03</u>	<u>0.52</u>	--	<u>0.16</u>	<u>0.04</u>
Total Paving <i>Area 1</i>	1.15	11.15	15.10	0.02	0.72	0.56
Architectural Coatings (on-site) <i>Area 1</i>	<u>151.47</u>	<u>1.40</u>	<u>1.81</u>	--	<u>0.08</u>	<u>0.08</u>
Architectural Coatings (off-site) <i>Area 1</i>	<u>0.87</u>	<u>0.54</u>	<u>7.66</u>	<u>0.02</u>	<u>2.47</u>	<u>0.66</u>
Total Architectural Coatings <i>Area 1</i>	152.34	1.94	9.47	0.02	2.55	0.74
Area 1 Maximum Daily Emissions	152.34	58.34	64.16	0.24	26.09	11.86
Area 2 Construction Emissions						
Demolition (on-site) <i>Area 2</i>	<u>2.26</u>	<u>21.48</u>	<u>19.64</u>	<u>0.03</u>	<u>3.06</u>	<u>1.24</u>
Demolition (off-site) <i>Area 2</i>	<u>0.05</u>	<u>0.03</u>	<u>0.48</u>	--	<u>0.16</u>	<u>0.04</u>
Total Demolition <i>Area 2</i>	2.31	21.51	20.12	0.03	3.22	1.28
Site Preparation (on-site) <i>Area 2</i>	<u>2.65</u>	<u>27.52</u>	<u>18.24</u>	<u>0.03</u>	<u>19.33</u>	<u>11.09</u>
Site Preparation (off-site) <i>Area 2</i>	<u>0.06</u>	<u>0.04</u>	<u>0.57</u>	--	<u>0.20</u>	<u>0.05</u>
Total Site Preparation <i>Area 2</i>	2.71	27.56	18.81	0.03	19.53	11.14
Grading (on-site) <i>Area 2</i>	<u>3.32</u>	<u>34.51</u>	<u>28.05</u>	<u>0.06</u>	<u>27.99</u>	<u>6.83</u>
Grading (off-site) <i>Area 2</i>	<u>0.07</u>	<u>0.04</u>	<u>0.64</u>	--	<u>0.22</u>	<u>0.06</u>
Total Grading <i>Area 2</i>	3.39	34.55	28.69	0.06	28.21	6.89
Building Construction (on-site) <i>Area 2</i>	<u>1.57</u>	<u>14.38</u>	<u>16.24</u>	<u>0.02</u>	<u>0.69</u>	<u>0.65</u>
Building Construction (off-site) <i>Area 2</i>	<u>4.95</u>	<u>32.71</u>	<u>43.93</u>	<u>0.22</u>	<u>15.25</u>	<u>4.18</u>
Total Building Construction <i>Area 2</i>	6.52	47.09	60.17	0.24	15.94	4.83
Building Construction (on-site) <i>Area 2</i>	<u>1.47</u>	<u>13.44</u>	<u>16.16</u>	<u>0.02</u>	<u>0.61</u>	<u>0.57</u>
Building Construction (off-site) <i>Area 2</i>	<u>4.72</u>	<u>32.42</u>	<u>41.35</u>	<u>0.21</u>	<u>15.20</u>	<u>4.18</u>
Total Building Construction <i>Area 2</i>	6.19	45.86	57.51	0.23	15.81	4.75
Paving (on-site) <i>Area 2</i>	<u>0.98</u>	<u>9.52</u>	<u>14.62</u>	<u>0.02</u>	<u>0.46</u>	<u>0.43</u>
Paving (off-site) <i>Area 2</i>	<u>0.05</u>	<u>0.03</u>	<u>0.45</u>	--	<u>0.16</u>	<u>0.04</u>
Total Paving <i>Area 2</i>	1.03	9.55	15.07	0.02	0.62	0.47

Table 3-5
Estimated Daily Construction Emissions (pounds/day) - continued

Construction Phase	ROG	NO ₂	CO	SO ₂	PM ₁₀	PM _{2.5}
Architectural Coatings (on-site) <i>Area 2</i>	<u>154.24</u>	<u>1.14</u>	<u>1.80</u>	--	<u>0.05</u>	<u>0.05</u>
Architectural Coatings (off-site) <i>Area 2</i>	<u>0.73</u>	<u>0.40</u>	<u>6.14</u>	<u>0.02</u>	<u>2.47</u>	<u>0.66</u>
Total Architectural Coatings <i>Area 2</i>	154.97	1.54	7.94	0.02	2.52	0.71
Area 2 Maximum Daily Emissions	154.97	47.09	60.17	0.24	28.21	11.14
Area 3 Construction Emissions						
Demolition (on-site) <i>Area 3</i>	<u>3.51</u>	<u>35.78</u>	<u>22.06</u>	<u>0.03</u>	<u>2.84</u>	<u>1.82</u>
Demolition (off-site) <i>Area 3</i>	<u>0.07</u>	<u>0.05</u>	<u>0.67</u>	--	<u>0.16</u>	<u>0.04</u>
Total Demolition <i>Area 3</i>	3.58	35.83	22.73	0.03	3.00	1.86
Site Preparation (on-site) <i>Area 3</i>	<u>4.33</u>	<u>45.57</u>	<u>22.06</u>	<u>0.03</u>	<u>20.45</u>	<u>12.12</u>
Site Preparation (off-site) <i>Area 3</i>	<u>0.08</u>	<u>0.06</u>	<u>0.80</u>	--	<u>0.20</u>	<u>0.05</u>
Total Site Preparation <i>Area 3</i>	4.41	45.63	22.86	0.03	20.65	12.17
Grading (on-site) <i>Area 3</i>	<u>4.73</u>	<u>54.52</u>	<u>33.37</u>	<u>0.06</u>	<u>17.96</u>	<u>6.53</u>
Grading (off-site) <i>Area 3</i>	<u>0.09</u>	<u>0.06</u>	<u>0.89</u>	--	<u>0.22</u>	<u>0.06</u>
Total Grading <i>Area 3</i>	4.82	54.58	34.26	0.06	18.18	6.59
Building Construction (on-site) <i>Area 3</i>	<u>2.11</u>	<u>19.18</u>	<u>16.84</u>	<u>0.02</u>	<u>1.11</u>	<u>1.05</u>
Building Construction (off-site) <i>Area 3</i>	<u>6.43</u>	<u>49.72</u>	<u>56.05</u>	<u>0.24</u>	<u>15.45</u>	<u>4.38</u>
Total Building Construction <i>Area 3</i>	8.54	68.90	72.89	0.26	16.56	5.43
Building Construction (on-site) <i>Area 3</i>	<u>1.90</u>	<u>17.43</u>	<u>16.57</u>	<u>0.02</u>	<u>0.95</u>	<u>0.90</u>
Building Construction (off-site) <i>Area 3</i>	<u>5.87</u>	<u>45.17</u>	<u>51.48</u>	<u>0.23</u>	<u>15.31</u>	<u>4.24</u>
Total Building Construction <i>Area 3</i>	7.77	62.60	68.05	0.25	16.26	5.14
Paving (on-site) <i>Area 3</i>	<u>1.35</u>	<u>14.06</u>	<u>14.65</u>	<u>0.02</u>	<u>0.75</u>	<u>0.69</u>
Paving (off-site) <i>Area 3</i>	<u>0.06</u>	<u>0.04</u>	<u>0.61</u>	--	<u>0.16</u>	<u>0.04</u>
Total Paving <i>Area 3</i>	1.41	14.10	15.26	0.02	0.91	0.73
Architectural Coatings (on-site) <i>Area 3</i>	<u>152.88</u>	<u>1.52</u>	<u>1.81</u>	--	<u>0.09</u>	<u>0.09</u>
Architectural Coatings (off-site) <i>Area 3</i>	<u>0.92</u>	<u>0.60</u>	<u>8.28</u>	<u>0.02</u>	<u>2.47</u>	<u>0.66</u>
Total Architectural Coatings <i>Area 3</i>	153.80	2.12	10.09	0.02	2.56	0.75
Area 1 Maximum Daily Emissions	153.80	68.90	72.89	0.26	20.65	12.17
Daily Thresholds	75	100	550	150	150	55

Source: California Air Resources Board CalEEMod [computer program].

Airborne emissions will occur during the various development phases from the following sources:

- Activities related to ongoing land clearance, grading, and excavation will result in both equipment emissions and fugitive dust emissions. The majority of these NO_x emissions will be associated with the use of diesel-powered construction equipment and fugitive dust (PM₁₀) associated with construction.
- Equipment emissions associated with the use of construction equipment during site preparation and construction activities.

- Delivery vehicles and workers commuting to and from the construction site will generate mobile emissions. The primary pollutant is CO with secondary emissions of ROG and NO_x. As indicated previously, the use of diesel trucks and other equipment will generate large amounts of NO_x.

The potential construction-related emissions from the proposed project were estimated using the computer model CalEEMod developed for the SCAQMD (the worksheets are included in the Appendix). ~~The entire project construction period is expected to last until 2024.~~ The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.4. As shown in Table 3-5, daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases). Therefore, the mass daily construction-related impacts associated with the proposed project would be significant.

As indicated previously, the Planning Area is located in a non-attainment area for ozone and particulates. Therefore, the project Applicant will be required to adhere to all SCAQMD regulations related to fugitive dust generation and other construction-related emissions. According to SCAQMD Regulation 403, all unpaved demolition and construction areas shall be regularly watered up to three times per day during excavation, grading, and construction as required (depending on temperature, soil moisture, wind, etc.). Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. Watering could reduce fugitive dust by as much as 55%. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust. Finally, the contractors must comply with other SCAQMD regulations governing equipment idling and emissions controls. The aforementioned SCAQMD regulations are standard conditions required for every construction project undertaken in the City.

Long-term (operational) emissions refer to those air quality impacts that would occur once the proposed project is operational. These impacts would continue over the operational life of the project. The long-term air quality impacts associated with the proposed project includes mobile emissions associated with vehicular traffic and stationary emissions. The analysis of long-term operational impacts was completed using the CalEEMod computer model.

As indicated in Table 3-6, the projected long-term emissions would exceed SCAQMD thresholds for Reactive Organic Gases (ROG) and NO_x ~~and PM₁₀~~. ROG is an organic gas that undergoes a photochemical reaction, thus, is reactive. ~~NO_x ROG~~ emissions are generated from the exhaust of mobile sources and these gases are precursors to ozone. ~~PM₁₀ refers to small particulates (ten microns in size or smaller.~~ Since the project will result in an exceedance in mobile sourced ROG, and NO_x, ~~and PM₁₀~~, mitigation measures have been provided to encourage the use of alternative forms of transportation.

The total operational emissions for all three areas is shown in Row 4. Near the bottom of the Table, the overlapping emissions for those Areas that are under construction together with the operational emissions from the areas that will be operational at the same time have been noted. The ROG emissions are related to the use of architectural coatings and paints that contain volatile organic compounds (VOCs), which are reactive in normal ambient outdoor temperatures. The high levels of NO_x are largely due to diesel powered construction equipment and trucks used during the building construction phases.

Table 3-6
Estimated Operational Emissions in lbs/day at Build-out

Emission Source	ROG	NO ₂	CO	SO ₂	PM ₁₀	PM _{2.5}
1. Total Area 1 (lbs/day)	<u>26.11</u>	<u>56.50</u>	<u>124.49</u>	<u>0.45</u>	<u>35.58</u>	<u>9.87</u>
2. Total Area 2 (lbs/day)	<u>52.57</u>	<u>134.36</u>	<u>269.30</u>	<u>1.10</u>	<u>93.78</u>	<u>25.93</u>
3. Total Area 3 (lbs/day)	<u>13.04</u>	<u>42.54</u>	<u>70.39</u>	<u>0.21</u>	<u>14.14</u>	<u>3.95</u>
4. Total (lbs/day) 1.	91.72	233.40	464.18	1.76	143.50	39.75
Daily Thresholds	55	55	550	150	150	55
Significant Impact?	Yes	Yes	No	No	No	No
Overlapping Scenario 1						
Area 3 Operational	<u>13.04</u>	<u>42.54</u>	<u>70.39</u>	<u>0.21</u>	<u>14.14</u>	<u>3.95</u>
Area 1 Construction	<u>152.34</u>	<u>15.34</u>	<u>64.16</u>	<u>0.24</u>	<u>26.09</u>	<u>11.86</u>
Total	165.38	57.88	134.55	0.45	40.23	15.81
Daily Thresholds	55	55	550	150	150	55
Significant Impact?	Yes	Yes	No	No	No	No
Overlapping Scenario 2						
Area 3 Operational	<u>13.04</u>	<u>42.54</u>	<u>70.39</u>	<u>0.21</u>	<u>14.14</u>	<u>3.95</u>
Area 1 Operational	<u>26.11</u>	<u>56.50</u>	<u>124.49</u>	<u>0.45</u>	<u>35.58</u>	<u>9.87</u>
Area 2 Construction	<u>154.97</u>	<u>47.09</u>	<u>60.17</u>	<u>0.24</u>	<u>28.21</u>	<u>11.14</u>
Total	194.12	146.13	255.05	0.90	77.93	24.96
Daily Thresholds	55	55	550	150	150	55
Significant Impact?	Yes	Yes	No	No	No	No

Source: California Air Resources Board CalEEMod [computer program].

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases). Therefore, the mass daily construction-related impacts associated with the proposed project would be significant. The proposed project would also generate operational emissions that would exceed the thresholds for ROG, and NO_x and PM₁₀. Much of the pollution will be generated from mobile sources. Therefore, mitigation must be implemented to reduce the number of vehicle trips that will be generated by the proposed project.

MITIGATION OF POTENTIAL IMPACTS

The following mitigation would be required to further reduce air emissions.

Mitigation Measure 5 (Air Quality Impacts). The project Applicant; retail, restaurant, and hotel management and office building management must provide incentives to encourage employees to utilize alternative transportation such as reduced rate transit passes, employee carpooling and vanpooling services, and preferential parking for carpool vehicles.

Mitigation Measure 6 (Air Quality Impacts). The building contractors must install electric vehicle (EV) charging stations in the parking garages. The number and location of the EV stations will be determined by the City in subsequent phases of design review and plan check. Preferential parking spaces for electric vehicles must be provided in every Area.

Mitigation Measure 7 (Air Quality Impacts). Multiple shuttles powered by alternative fuels must be provided in the absence of the monorail. Once the monorail is complete and running, use of the shuttles may be discontinued. The use of the shuttles will discourage future patrons and guests from using their personal vehicle from travelling to different Areas of the project.

Mitigation Measure 8 (Air Quality Impacts). Kiosks and directories depicting mass transit times and routes, the locations of bicycle racks, and the locations and times of the shuttles must be placed in visible locations within each project area.

Mitigation Measure 9 (Air Quality Impacts/Environmental Justice). The project Applicant must host a job fair with advertising prior to the project's opening to attract and hire local residents. In addition, preferential hiring must be given for Commerce residents. By hiring future employees from the City, the Applicant will reduce the number and distance of employee home-to-work trips.

The SCAQMD following their review of the Draft EIR indicated that even though the proposed project's construction and operational emissions would exceed thresholds, the following additional mitigation measures were warranted. If the Lead Agency finds, after revising the air quality analysis based on SCAQMD staff's comments that the project would result in significant air quality impacts, particularly from NOx and PM2.5 emissions, mitigation measures are required. To assist the identification of feasible mitigation measures that are capable of reducing construction emissions from NOx and particulate matter, the SCAQMD recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR.

SCAQMD Mitigation Measure a. Require construction contractor(s) to use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (U.S. EPA) Tier 4 offroad emissions standards for equipment rated at 50 horsepower or greater during construction.

SCAQMD Mitigation Measure b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.

SCAQMD Mitigation Measure c. Require that the proposed project's tenants maintain records of all trucks visiting the project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the project meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

SCAQMD Mitigation Measure d. Maintain vehicle and equipment maintenance records for the construction portion of the project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.

SCAQMD Mitigation Measure e. Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 – CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle that is expected to idle longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. To further ensure that drivers understand the vehicle idling requirement, post signs at the entrance and throughout the site stating that idling longer than five minutes is not permitted.

SCAQMD Mitigation Measure f. Encourage construction contractors to apply for SCAQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. Since the project would result in significant and unavoidable air quality impacts during operation, and in addition to Mitigation Measures (Air Quality) 5 through 9, the SCAQMD staff recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce the proposed project's operational air quality impacts.

SCAQMD Mitigation Measure g. Require at least 5% of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.

SCAQMD Mitigation Measure h. Provide incentives for vendors and material delivery trucks that would be visiting the hotel and commercial uses to encourage the use of zero-emission or near-zero emission heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year10 or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.

SCAQMD Mitigation Measure i. Implement an anti-idling program. Vendors should be instructed to advise drivers that trucks and other equipment shall not be left idling for more than five minutes. Signs informing truck drivers of the anti-idling policy should be posted in the loading docks of the Proposed Project.

SCAQMD Mitigation Measure j. Establish a policy to select and use vendors that use clean vehicles and trucks to service and deliver materials. Include this policy in the vendor contracts and business agreement.

SCAQMD Mitigation Measure k. Maximize the planting of trees in landscaping and parking lots.

SCAQMD Mitigation Measure l. Require use of electric or alternatively fueled street-sweepers with HEPA filters.

SCAQMD Mitigation Measure m. Require use of electric lawn mowers and leaf blowers.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The construction emissions would exceed the SCAQMD thresholds for ROG. The proposed project would also generate operational emissions that would still exceed the thresholds for ROG and NO_x and PM₁₀. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to air quality impacts.

3.2.4.3 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS IN NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD (INCLUDING RELEASING EMISSIONS, WHICH EXCEED QUANTITATIVE THRESHOLDS FOR OZONE PRECURSORS).

DISCUSSION OF IMPACT ANALYSIS

Once operational, the project will result in an exceedance in ROG and NO_x, which are two compounds that are known as ozone precursors. ~~The project will also generate an exceedance in CO emissions.~~ These exceedances are produced by mobile sources such as trucks and vehicles. The cumulative impacts associated with the project's operation would be potentially significant in the absence of mitigation aimed to control and reduce vehicle dependency. The exceedance in ROG, NO_x, and PM₁₀ during operations may contribute to a greater citywide issue, such as elevated cancer risk due to a high concentration of air pollution. Mitigation measures aimed at reducing mobile emissions include measures to promote carpooling, the use of public transit, the use of vehicles fueled by alternative sources, and the use of bicycles by providing bicycle parking racks. Adherence to the mitigation measures provided in the previous subsection as well as to the goals and policies outlined in the City of Commerce General Plan Air Quality Element will reduce the potential air emissions. The Air Quality Element in the City's General Plan identifies specific goals aimed at reducing mobile sourced emissions citywide. These polices include:⁶⁶

⁶⁶ Commerce, City of. *City of Commerce 2020 General Plan, Section 8 Air Quality Element*. January 2008

- *Air Quality [Element] Policy 2.1.* The City of Commerce will require that developers of high density and mixed-use developments consult with the local transit agency and incorporate all appropriate and feasible transit amenities into the plans.
- *Air Quality [Element] Policy 2.4.* The City of Commerce will create opportunities to receive State transportation funds by adopting incentives (e.g., an expedited review process) for planning and implementing infill development projects within urbanized areas that include job centers and clean transportation nodes (e.g., preparation of "transit village" plans).
- *Air Quality [Element] Policy 2.5.* The City of Commerce will collaborate with local, regional, state and federal agencies to create incentives for "job/housing opportunity zones," to promote housing in job-rich areas and jobs in housing rich areas. The Housing Opportunity areas identified in the Community Development Element are consistent with this policy.
- *Air Quality [Element] Policy 2.7.* The City of Commerce will promote mass transit ridership through careful planning of routes, headways, origins and destinations, and types of vehicles.
- *Air Quality [Element] Policy 2.8.* The City of Commerce will seek new cooperative relationships between employers and employees to reduce vehicle miles traveled (VMT).
- *Air Quality [Element] Policy 2.9.* The City of Commerce will work with large employers and commercial/industrial complexes to create Transportation Management Associations and to implement trip/VMT action strategies.
- *Air Quality [Element] Policy 2.10.* The City of Commerce will cooperate with surrounding jurisdictions to provide incentives, adopt regulations, and develop transportation demand management programs educe and eliminate vehicle trips and VMT.
- *Air Quality [Element] Policy 2.11.* The City of Commerce will collaborate with local transit agencies to develop programs and educate employers about employee rideshare and transit.
- *Air Quality [Element] Policy 2.12.* The City of Commerce will identify and develop non-motorized transportation corridors (e.g., bicycling and pedestrian trails and lanes).
- *Air Quality [Element] Policy 3.1.* The City of Commerce will manage the city's transportation fleet fueling standards to achieve the greatest number of alternative fuel vehicles in the city fleet.
- *Air Quality [Element] Policy 3.2.* The City of Commerce will support the development of alternative fuel infrastructure that is publicly accessible.
- *Air Quality [Element] Policy 3.3.* The City of Commerce will establish programs for priority or free parking on city streets or in city parking lots for alternative fuel vehicles.
- *Air Quality [Element] Policy 3.4.* The City of Commerce will cooperate with federal and state agencies and the AQMD in their efforts to reduce exposure from railroad and truck emissions.

The ongoing implementation of the aforementioned General Plan policies coupled with the strict adherence to the mitigation identified in the previous subsection will reduce cumulative citywide mobile emissions.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

As indicated in the previous subsection, the project would exceed the SCAQMD's operational thresholds for ROG and NO_x ~~and PM₁₀~~.

MITIGATION OF POTENTIAL IMPACTS

The project Applicant's implementation of the mitigation measures identified in the previous subsection will reduce the proposed project's net increase in criteria pollutants for which the region is in nonattainment status. The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases) even with the implementation of the required mitigation. The proposed project would also generate operational emissions that would still exceed the thresholds for ROG and NO_x, ~~and CO~~.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases) even with the implementation of the required mitigation. The proposed project would also generate operational emissions that would still exceed the thresholds for ROG, NO_x, and CO. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to air quality impacts.

3.2.4.4 THE PROPOSED PROJECT'S POTENTIAL FOR EXPOSING SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS.

DISCUSSION OF IMPACT ANALYSIS

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air.⁶⁷ These population groups are generally more sensitive to poor air quality. The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project will result in an exceedance of *localized emissions thresholds* or *LSTs*. The approach used in the analysis of the proposed project utilized a number of screening tables that identified maximum allowable emissions (in pounds per day) at a specified distance to a receptor. Sensitive receptors located near the project site include the following: the single-family residential neighborhood located along the south side of the I-5 freeway and Rosewood Park School, located 222 feet to the southwest and Rosewood Park, located 267 feet to the southwest. The park and the school are also located south of the I-5 Freeway. The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO₂; carbon monoxide (CO) emissions from construction and operations; PM₁₀ emissions from construction and operations; and PM_{2.5} emissions from construction and operations. As shown in Table 3-7, the proposed project will ~~not~~ exceed ~~any~~ construction PM_{2.5} based on the

⁶⁷ South Coast Air Quality Management District. *CEQA Air Quality Handbook*. <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>

information included in the Mass Rate LST Look-up Tables provided by the SCAQMD. For purposes of the LST analysis, the receptor distance used was ~~2,100~~ 50 meters.

Table 3-7
Local Significance Thresholds Exceedance SRA 5
(assumes maximum daily emissions from each area)

Emissions	Project Emissions (lbs/day)	Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)				
		25	50	100	200	500
NO ₂	68.90	172	165	176	194	244
CO	72.89	1,480	1,855	2,437	3,867	9,312
PM ₁₀	28.21 (14.10)*	14	42	60	95	203
PM _{2.5}	12.17 (6.08)*	7	10	15	30	103

*The figures shown in parentheses represent the mitigated particulate emissions levels whereby the watering of barren soils of up to three times per day per Rule 403 is implemented. This requirement will reduce fugitive dust by as much as 50%.

The proposed project's construction will not lead to any exceedance of LST thresholds during the construction phases. Furthermore the project's adherence to the mitigation identified in the previous subsections will reduce potential localized impacts to levels that are less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The project's potential for exposing sensitive receptors to exceedances in criteria pollutants will be minimized with adherence to the standard conditions prescribed by the SCAQMD for construction activities. These standard conditions are standard protocols that are required by the SCAQMD for every development project undertaken within the agency's jurisdiction. In addition, adherence to the mitigation measures identified in previous Subsections will reduce the project's operational mobile emissions to the fullest extent possible.

MITIGATION OF POTENTIAL IMPACTS

No additional mitigation beyond that identified in Subsection 3.2.4.2 will be required since no significant LST thresholds will be exceeded.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated that the proposed project would not result in an exposure of sensitive receptors to substantial pollutant concentrations.

3.2.4.5 THE PROPOSED PROJECT'S POTENTIAL FOR CREATING OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE.

DISCUSSION OF IMPACT ANALYSIS

The SCAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.⁶⁸ None of the various uses that are proposed as part of the project will be involved in the aforementioned activities. As a result, no impacts related to the generation of objectionable odors will result.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project will not result in any significant adverse impacts related to the generation of odors.

MITIGATION OF POTENTIAL IMPACTS

The analysis determined that no mitigation was required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated that the proposed project would not have the potential for creating objectionable odors that could affect a substantial number of people.

⁶⁸ South Coast Air Quality Management District. *CEQA Air Quality Handbook*. <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>

3.3 CULTURAL RESOURCES IMPACTS

This section describes the setting and potential effects associated with the proposed project's implementation on archeological resources.

3.3.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. Based on the results of the preliminary environmental analysis undertaken as part of the Initial Study's preparation, the project's potential for the following impacts are evaluated in this EIR:

- A substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines.

3.3.2 ENVIRONMENTAL SETTING

There are a number of existing regulations applicable to any new development that will be effective in further reducing potential cultural resources impacts. These regulations are considered to be standard conditions in that they are required regardless of whether an impact requires mitigation. Those regulations that will serve as standard conditions with respect to potential cultural resources impacts are listed below.

Regulatory Setting - Federal Regulations

Federal regulations for cultural resources are governed primarily by Section 106 of the National Historic Preservation Act (NHPA) of 1966. Section 106 of NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, *Protection of Historic Properties*, are found in 36 Code of Federal Regulations (CFR), Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places.

The criteria for determining National Register Eligibility are found in 36 CFR Part 60, Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While Federal agencies must follow Federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if a project requires a Federal permit or if it uses Federal money. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons;

- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.

Regulatory Setting - State

State historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC). A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, that is historically or archaeologically significant. Section 15064.5 of the CEQA Guidelines specifies criteria for evaluating the importance of cultural resources. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. CEQA, as codified at PRC Sections 21000 et seq., is

the principal statute governing the environmental review of projects in the State. As defined in PRC Section 21083.2, a “unique” archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- The resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- The resources has a special and particular quality such as being the oldest of its type or the best available example of its type; and,
- The resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

In addition, the California State Assembly drafted a bill known as Assembly Bill 52 (AB-52), which is an act to amend Section 5097.94 of the Public Resources Code, and to add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 of the Public Resources Code, relating to Native Americans. This bill was signed into law by Governor Edmund G. Brown on September 25, 2014 and took into affect beginning on July 1, 2015. Under AB-52, Lead Agencies who oversee the preparation of an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration are required to consult with local Native American tribes to determine the likelihood of encountering significant archaeological resources. This consultation period is valid for 30 days and is independent of the public review period required once a project is recorded at the County Clerk. The tribal representatives may request on-site monitoring during a project’s construction phase, indicate that no monitoring is necessary, or choose to not provide any form consultation. Regardless of the outcome, the request for consultation is mandatory.

Regulatory Setting - City of Commerce

The Resource Management Element of the Commerce General Plan addresses the State’s requirements for an open space element and conservation element. The scope of this Element was expanded to include cultural resources, including historic resources. This Element also includes a number of policies that are relevant to historic preservation.⁶⁹

- *Resource Management [Element] Policy 2.1.* The City of Commerce will strive to preserve the history of the city and any historical places in the city, such as the railroad station and the rubber trees in the vicinity of Olympic and Goodrich Boulevards.
- *Resource Management [Element] Policy 2.2.* The City of Commerce will evaluate other potential significant sites in the community, and will continue to recognize the city’s cultural and historical resources.
- *Resource Management [Element] Policy 2.3.* The City of Commerce will document local historic sites and promote the public’s awareness of these resources.

⁶⁹ Commerce, City of. *City of Commerce 2020 General Plan, Section 6 Resource Management Element*. January 2008

- *Resource Management [Element] Policy 2.4.* The City of Commerce will explore opportunities for the development of a city museum and cultural center.

Prehistoric Setting

The first occupants of the Southern California migrated into the region thousands of years prior to the European discovery of the New World. The Southern California area was first occupied by Native Americans who were the descendants of the hunting and gathering peoples that migrated from Asia into North America. The time period in which these early peoples were first established in the Southern California region is uncertain, though there is archaeological evidence that a fully maritime-adapted, seafaring culture existed in Southern California at least ten thousand years ago. On the mainland, discoveries at Rancho La Brea and the recovery of artifacts at Malaga Cove on Santa Monica Bay, suggest a long history of occupation for the region.⁷⁰

The greater Los Angeles Basin was previously inhabited by the Gabrieleño-Kizh people, named after the San Gabriel Mission.⁷¹ The Gabrieleño tribe has lived in this region for around 7,000 years.⁷² Prior to Spanish contact, approximately 5,000 Gabrieleño people lived in villages throughout the Los Angeles Basin.⁷³ Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. Three early villages were located in the vicinity of Commerce: Apachianga, Isantcangna, and Tsungna. Indian gathering activities were most likely concentrated along the Los Angeles and Rio Hondo River channels. Another post contact Indian village site, referred to as La Jaboneria (the soap factory), was known to have existed on the east bank of the Rio Hondo River in an area located south of Telegraph Road.⁷⁴

Historic Setting

Commerce contains several known points of local and statewide historical and cultural interest. Three historic sites in Commerce are officially commemorated. The Uniroyal Tire Plant and the Pillsbury Mill are both listed on the State Register of Historical Places. A plaque marks the site of Vail Landing Field, where Western Airlines began its West Coast passenger and airmail service. Additional sites of interest include the Union Pacific (East Los Angeles) Train Station; the Mount Olive, the Russian Molokan Christian Spiritual Jumpers Lemente, and Mount Carmel ethnic cemeteries; and the 1942 Sleepy Lagoon Murder site. The latter site is noteworthy in that the murder led to a trial that culminated in the Zoot Suit Riots, focusing international attention on the early Mexican-American political movement.

⁷⁰ McCawley, William. *The First Angelinos, The Gabrielino Indians of Los Angeles*. 1996.

⁷¹ Tongva People of Sunland-Tujunga. *Introduction*. http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html

⁷² Ibid.

⁷³ Rancho Santa Ana Botanical Garden. *Tongva Village Site*. <http://www.rsabg.org/tongva-village-site-1>

⁷⁴ City of Commerce. *2020 General Plan*. Plan adopted in 2008.

3.3.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project will normally have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project's potential for a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines.

3.3.4 ENVIRONMENTAL IMPACTS

3.3.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO §15064.5 OF THE CEQA GUIDELINES.

DISCUSSION OF IMPACT ANALYSIS

The Citadel as a whole was originally developed as a Samson Tire and Rubber Company factory, which existed from 1929 until the plant's closure in 1978. Area 1 is presently occupied by two warehouses and surplus parking for the Citadel. Area 2 is currently developed, though the area contained more buildings and paved surfaces. The demolition of much of these buildings began in 2006. As stated in Section 2, the west side of Area 2 is currently occupied by Justman Packaging and Display, ancillary parking, and a vacant building. The east side of Area 2 is largely undeveloped and is covered over in dirt, sparse ruderal vegetation, and mounds of dirt and gravel. An abandoned warehouse is located within the southwest corner of east side of Area 2. Area 3 was developed with multiple industrial buildings. These buildings have been demolished. The initial development and the subsequent improvements that have occurred over the years has resulted in extensive disturbance of the on-site soils.⁷⁵ As a result, there is a limited likelihood that archaeological resources will be encountered during the site's redevelopment.

Formal Native American consultation was provided in accordance with AB-52. The tribal representative of the Gabrielino-Kizh indicated that the project site is situated in an area of high archaeological significance. As part of future grading and excavation activities, the potential for discovering archaeological resources cannot be completely discounted. For this reason, mitigation has been identified to address any resources that may be uncovered during grading activities.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

No archaeological resources have been identified by the archival search or field survey. Formal consultation was undertaken pursuant to AB-52. According to the tribal representative for the Gabrielino-Kizh, the project sites are located in an area of high archaeological significance. Therefore, mitigation is provided to ensure that the site is free of any archaeological resources.

⁷⁵ Blodgett Baylosis Environmental Planning. *Site Survey* (October 8, 2018 through January 7, 2019)

MITIGATION OF POTENTIAL IMPACTS

The following mitigation measure will be required to address potentially significant impacts.

Mitigation Measure 10 (Cultural Resources Impacts). The project Applicant will be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) must be approved by the tribal representatives and the City's Development Services Director and will be present on-site during the construction phases that involve any ground disturbing activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not have the potential for causing a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines.

3.4 GREENHOUSE GAS EMISSIONS IMPACTS

On April 13, 2009, the Governor's Office of Planning and Research (OPR) submitted to the Secretary for Natural Resources its proposed amendments to the *CEQA Guidelines* for GHG emissions, as required by Public Resources Code section 21083.05 (Senate Bill 97). For example, if a lead agency determines that GHGs may be generated by a proposed project, the agency is responsible for assessing GHG emissions by type and source.

3.4.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental analysis undertaken as part of the Initial Study's preparation indicated the EIR should evaluate the following issues related to potential greenhouse gases:

- The proposed project's potential for resulting in the generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and,
- The proposed project's potential for increasing the potential for conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

3.4.2 ENVIRONMENTAL SETTING

Description of Greenhouse Gas (GHG) Emissions

Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. These greenhouse gases trap the heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). The key GHG include the following:

- *Carbon dioxide (CO₂)* is an odorless, colorless gas, which has both natural and anthropogenic (arising from human activities) sources. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic out-gassing. Man-made sources of carbon dioxide are from burning coal, oil, natural gas, and wood. CO₂ emissions are mainly associated with fossil fuel combustion and fossil fuel combustion originating in California and out-of-state power plants that supply electricity to California. Other activities that produce CO₂ emissions include mineral production, waste combustion, and vegetation removal.
- *Methane (CH₄)* is a flammable gas and is the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. A natural source of methane is from the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are landfills, fermentation of manure, and cattle.

- *Nitrous oxide (N₂O)*, also known as laughing gas, is produced naturally by microbial processes in soil and water. Man-made sources of nitrous oxide include agricultural sources, industrial processing, fossil fuel-fired power plants, and vehicle emissions. Nitrous oxide is also used as an aerosol spray propellant and in medical applications. In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and water vapor. Of all the GHGs, CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potential than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e.

In addition, there are a number of man-made pollutants, such as CO, NO_x, non-methane VOC, and SO₂, that have indirect effects on terrestrial or solar radiation absorption by influencing the formation or destruction of other climate change emissions. As emissions of GHGs increase, temperatures in California are projected to rise significantly over the twenty-first century. The modeled magnitudes of the warming vary because of uncertainties in future emissions and in the climate sensitivity.

Regulatory Setting - State

A number of states, including California, have set statewide GHG emission targets. The passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, established the California target to achieve reductions in GHG to 1990 GHG emission levels by the year 2020.⁷⁶ Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40 percent reduction in greenhouse gas emissions below 1990 levels by 2030.⁷⁷

The *California Air Resources Board (CARB)* is part of the California Environmental Protection Agency (CALEPA) and is responsible for overseeing the implementation of the California Clean Air Act, meeting State requirements of the Federal Clean Air Act, and the establishment of the State ambient air quality standards. The CARB is responsible for the preparation setting emission standards for vehicles sold in California and for other emission-sources including consumer goods and off-road equipment. The CARB also established vehicle reformulated fuel specifications and the GHG reduction targets identified in SB 375.

Once operational, the project is required to comply with *Title 24 of the California Code of Regulations* established by the Energy Commission regarding energy conservation standards. The project is also required to comply with Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings of the California Code of Regulations which was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. All buildings for which an application for a building permit is submitted on or after July 1, 2014 must follow the 2013 standards. Energy efficient buildings require less electricity; therefore, increased

⁷⁶ California, State of. OPR Technical Advisory – CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review. June 19, 2008. <http://opr.ca.gov/ceqa/climate-change.html>

⁷⁷ Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030*. <http://gov.ca.gov/news.php?id=18938>

energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions. The California Green Building Standards Code (code section in parentheses) requires:

- *Short-term Bicycle Parking.* If a commercial project is anticipated to generate visitor traffic, a project is required to provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by.
- *Long-term Bicycle Parking.* For buildings with over ten tenant-occupants, a project must provide secure bicycle parking for five percent of tenant-occupied motorized vehicle parking capacity.
- *Designated Parking.* A project must provide designated parking in commercial projects for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles.
- *Recycling by Occupants.* A project must provide accessible areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling.
- *Construction Waste.* A project must provide a minimum 50% diversion of construction and demolition waste from landfills, increasing voluntarily to 80% for commercial projects. All (100%) trees, stumps, rocks and associated vegetation and soils resulting from land clearing shall be reused or recycled.
- *Wastewater Reduction.* Each building shall reduce the generation of wastewater with the installation of water-conserving fixtures *or* through the use of non-potable water systems.
- *Water Conservation.* A project must provide a 20% mandatory reduction in indoor water use with voluntary goal standards for 30, 35, and 40% reductions.
- *Water Meters.* Separate water meters for buildings in excess of 50,000 square feet or buildings projected to consume more than 1,000 gallons per day must be provided.
- *Irrigation Efficiency.* Moisture-sensing irrigation systems for larger landscaped areas must be provided.
- *Pollution Control.* Low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particleboard must be used.
- *Building Operations.* Mandatory inspections of energy systems (i.e. heat furnace, air conditioner, mechanical equipment) for nonresidential buildings over 10,000 square feet must occur to ensure that all are working at their maximum capacity according to their design efficiencies.

Regulatory Setting - City of Commerce

The Air Quality Element of the Commerce General Plan identifies specific policies aimed improving air quality in Commerce. These policies include devising strategies that promote the co-existence of sensitive receptors and

industrial uses; reducing automobile emissions; and promoting the use of alternative fuels. Policies designed to reduce global warming are outlined below:⁷⁸

- *Air Quality [Element] Policy 1.7.* The City of Commerce will actively participate in decisions on the siting or expansion of facilities or land uses (e.g. freeway expansions), to ensure the inclusion of air quality.
- *Air Quality [Element] Policy 5.1.* The City of Commerce will ensure that all future public facilities and improvements do not have a significant adverse air quality impact on the community and that any such impacts must be mitigated to the fullest extent possible.
- *Air Quality [Element] Policy 5.2.* The City of Commerce will oppose the over-concentration of polluting public facilities and improvements.
- *Air Quality [Element] Policy 5.3.* The City of Commerce will take a proactive role in meeting with regional planning agencies to ensure that the local community's voice is heard in air quality issues.

3.4.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project will normally be deemed to have a significant adverse environmental impact on greenhouse gas emissions, if it results in any of the following:

- The proposed project's potential for resulting in the generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and,
- The proposed project's potential for increasing the potential for conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

3.4.4 ENVIRONMENTAL IMPACTS

3.4.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN THE GENERATION OF GREENHOUSE GAS EMISSIONS.

DISCUSSION OF IMPACT ANALYSIS

Direct project-related greenhouse gas emissions include emissions from both area sources and mobile sources. The CalEEMod computer model was used to calculate CO₂ emissions and relies upon default trip data and project specific land use data to calculate emissions. Estimates are based on energy emissions from natural gas usage, as well as automobile emissions. As seen in Table 3-8, the total project-related direct operational emissions would result in 31,141 MTCO₂E/year.

⁷⁸ Commerce, City of. *City of Commerce 2020 General Plan, Section 8 Air Quality Element*. January 2008

**Table 3-8
Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ E
Long-Term – Area Emissions	0.09	--	--	0.09
Long-Term - Energy Emissions	8,101.34	0.29	0.08	8,134.95
Long-Term - Mobile Emissions	21,058.73	0.98	--	21,083.46
Long-Term – Waste Emissions	373.22	22.05	--	924.65
Long-Term – Water Emissions	739.72	4.70	0.11	891.90
Long-Term - Total Emissions	30,273.12	28.03	0.20	31,035.07
Total Construction Emissions	3,184.25	0.21	--	3,189.48
Construction Emissions Amortized Over 30 Years				106.31 MTCO ₂ E
Total Operational and Amortized Construction Emissions				31,141 MTCO ₂ E
Significance Threshold				10,000 MTCO₂E

Source: CalEEMod.V.2016.3.2

The project site's centralized urban location was articulated in the CalEEMod program. The project site's location in an urban area reduces the amount of vehicle miles travelled. The majority of the GHG emissions identified in Table 3-8 will come from mobile sources.

The location of the nearest bus stops was also selected, further reducing the number of trips. In addition, the eclectic mix of uses offered by the project increases the project's diversity. Diversity refers to a collection of a variety of uses (residential, retail, office, public services, etc) located in close proximity to each other. Diversity is important for reducing the number of trips because it eliminates the need to use vehicles to travel between different uses.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The project-related operational emissions (direct and indirect) would result in 31,141MTCO₂e/year. This figure represents the estimated mitigated emissions, which includes the use of energy and water efficient appliances and fixtures, the location of the nearest bus stops, the project's infill nature, and that the project contains a mix of uses. Despite the use of in-program mitigation measures, the project's operational GHG emissions are still expected to exceed the 10,000 MTCO₂e/year thresholds.

MITIGATION OF POTENTIAL IMPACTS

The proposed project will be required to comply with the Green Building Code requirements which will result in a reduction in GHG generation associated with water consumption, waste generation, and traffic. A number of comments on the Draft EIR indicated that the Final EIR should include mitigation measures that would be effective at reducing potential GHG emissions.

GHG Mitigation Measure a. The Citadel owners shall provide incentives to encourage employees to utilize alternative transportation such as reduced public transportation fares, employee carpooling and vanpooling services, and preferential parking for carpool and vanpool vehicles.

GHG Mitigation Measure b. The Gold Line extension will allow Citadel patrons to utilize the transit to travel to the project, thus reducing vehicle trips.

GHG Mitigation Measure c. If the option that involves the extension of the Gold Line through Commerce is pursued, the project Applicant shall provide a shuttle service to transport Citadel patrons to the Gold Line station from the project.

GHG Mitigation Measure d. The building contractors shall install electric vehicle charging stations in the parking areas.

GHG Mitigation Measure e. The Citadel owners must facilitate handicapped access onto the monorail. The monorail station must be designed to provide comfort and promote efficiency in passenger transport and consumption of fuel.

GHG Mitigation Measure f. The Citadel owners must schedule a meeting with representatives of the Los Angeles Metro (LA Metro) and the City of Commerce Public Works and Development Services Department to improve the bus stops that serve the project area. Improvements such as installing shaded benches, increasing bus frequency, and making improvements security will ensure reliable transit ridership. Furthermore, such improvements may increase transit ridership.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The GHG emissions will exceed the SCAQMD significance thresholds even with the implementation of the CARB requirements. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to GHG emissions impacts.

3.4.4.2 THE PROPOSED PROJECT'S POTENTIAL FOR CONFLICT WITH AN APPLICABLE PLAN, POLICY, OR REGULATION ADOPTED FOR THE REDUCTION OF GREENHOUSE GASES.

DISCUSSION OF IMPACT ANALYSIS

The City of Commerce does not have an adopted Climate Action Plan and there is no greenhouse gas reduction plan that is applicable to the proposed project. The California State Legislature adopted AB 32 which focuses on reducing greenhouse gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the CARB adopted the Climate Change Scoping Plan which outlines actions recommended programs and strategies to obtain that goal.⁷⁹ The proposed project would contribute to the emissions of GHGs, primarily CO₂, emitted by construction and operational activities. GHG impacts generally are considered to be cumulative impacts from a climate change perspective. Thus, the analysis of GHG emissions is to determine whether the proposed project impact is cumulatively considerable. The project does not pose any apparent conflict with the CARB recommended actions. Table 3-9 identifies which CARB *Recommended Actions* applies to the proposed project, and of those, whether the proposed project is consistent.

⁷⁹ California, State of. California Air Resources Board. *California's 2017 Climate Change Scoping Plan*. November 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

Table 3-9
Recommended Actions for Climate Change

ID #	Sector	Strategy Name	Applicable to Project?	Will Project Conflict With Implementation?
T-1	Transportation	Pavley I and II – Light-Duty Vehicle GHG Standards	No	No
T-2	Transportation	Low Carbon Fuel Standard (Discrete Early Action)	No	No
T-3	Transportation	Regional Transportation-Related GHG Targets	Yes	No
T-4	Transportation	Vehicle Efficiency Measures	No	No
T-5	Transportation	Ship Electrification at Ports (Discrete Early Action)	No	No
T-6	Transportation	Goods-movement Efficiency Measures	No	No
T-7	Transportation	Heavy Duty Vehicle Greenhouse Gas Emission Reduction Measure – Aerodynamic Efficiency (Discrete Early Action)	No	No
T-8	Transportation	Medium and Heavy-Duty Vehicle Hybridization	No	No
T-9	Transportation	High Speed Rail	No	No
W-1	Water	Water Use Efficiency	Yes	No
E-1	Electricity and Natural Gas	Increased Utility Energy Efficiency Programs More Stringent Building and Appliance Standards	Yes	No
E-2	Electricity and Natural Gas	Increase Combined Heat and Power Use by 30,000GWh	No	No
E-3	Electricity and Natural Gas	Renewable Portfolio Standard	Yes	No
E-4	Electricity and Natural Gas	Million Solar Roofs	No	No
CR-1	Electricity and Natural Gas	Energy Efficiency	Yes	No
CR-2	Electricity and Natural Gas	Solar Water Heating	No	No
GB-1	Green Buildings	Green Buildings	Yes	No
W-1	Water	Water Recycling	Yes	No
W-2	Water	Water System Energy Efficiency	Yes	No
W-3	Water	Reuse Urban Runoff	No	No
W-4	Water	Increase Renewable Energy Production	Yes	No
W-5	Water	Public Goods Charge (Water)	No	No
I-1	Industry	Energy Efficiency and Co-benefits Audits for Large Industrial Sources	No	No
I-2	Industry	Oil and Gas Extraction GHG Emission Reduction	No	No
I-3	Industry	GHG Leak Reduction from Oil and Gas Transmission	No	No
I-4	Industry	Refinery Flare Recovery Process Improvements	No	No
I-5	Industry	Removal of Methane Exemption from Existing Refinery Regulations	No	No
RW-1	Recycling and Waste Management	Landfill Methane Control (Discrete Early Action)	No	No
RW-2	Recycling and Waste Management	Additional Reductions in Landfill Methane – Capture Improvements	No	No
RW-3	Recycling and Waste Management	High Recycling/Zero Waste	Yes	No

Table 3-9
Recommended Actions for Climate Change (continued)

ID #	Sector	Strategy Name	Applicable to Project?	Wilt Project Conflict With Implementation?
F-1	Forestry	Sustainable Forest Target	No	No
H-1	High Global Warming Potential Gases	Motor Vehicle Air Conditioning Systems (Discrete Early Action)	No	No
H-2	High Global Warming Potential Gases	SF6 Limits in Non-Utility and Non-Semiconductor Applications (Discrete Early Action)	No	No
H-3	High Global Warming Potential Gases	Reduction in Perfluorocarbons in Semiconductor Manufacturing (Discrete Early Action)	No	No
H-4	High Global Warming Potential Gases	Limit High GWP Use in Consumer Products (Discrete Early Action, Adopted June 2008)	No	No
H-5	High Global Warming Potential Gases	High GWP Reductions from Mobile Sources	No	No
H-6	High Global Warming Potential Gases	High GWP Reductions from Stationary Sources	No	No
H-7	High Global Warming Potential Gases	Mitigation Fee on High GWP Gases	No	No
A-1	Agriculture	Methane Capture at Large Dairies	No	No

Source: California Air Resources Board, *Assembly Bill 32 Scoping Plan*, 2008.

The measures identified in Table 3-9 as being “applicable to the project” would be beneficial in reducing the overall GHG emissions:

- Program T-3 (Regional Transportation Related GHG Targets) would include the project’s pedestrian and shuttle transit elements.
- Programs E-1 (Electricity and Natural Gas), E-3, E-4, CR-1 (Energy Efficiency), and CR-2 correspond to the project’s use of energy efficient appliances.
- Program GB-1 (Green Buildings) corresponds to the project’s use of water and energy efficient fixtures.
- Programs W-1, W-2, W-4, and W-5 (Water Use Efficiency) reflect the water conservation that will be implemented as part of the proposed project’s operations.
- Finally, the proposed project will be required to comply with all pertinent requirements related to the reduction of waste and recycling (identified in Program RW-3 [High Recycling/Zero Waste]).

The proposed project will not conflict with the CARB’s thirty-nine recommended actions in California’s AB 32 Climate Change Scoping Plan.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The project would incorporate sustainable practices which include water, energy, solid waste, land use, and transportation efficiency measures. The proposed project would not be incompatible in conflict with the

remaining CARB Programs identified in Table 3-6. As a result, no incompatibility with any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases would occur.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant adverse impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not have the potential for increasing the potential for conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

3.5 HAZARDS & HAZARDOUS MATERIALS IMPACTS

This section discusses the potential hazards and hazardous materials impacts anticipated to result from the proposed project's implementation. The development of the project area will result in potential impacts associated with historic contamination. The future development will largely consist of commercial uses that will generate limited quantities of hazardous materials typically associated with maintenance, landscaping, and cleaning activities.

3.5.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The preliminary environmental analysis undertaken as part of the Initial Study's preparation indicated this EIR should evaluate the following issues:

- The proposed project's potential for creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project's potential for emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

3.5.2 ENVIRONMENTAL SETTING

There are a number of existing regulations applicable to any new development that will be effective in further reducing potential impacts related to hazards and hazardous materials. These regulations are considered to be standard conditions in that they are required for all development projects. Those regulations that will serve as standard conditions with respect to hazards and hazardous materials are identified in this section.

Regulatory Setting - Federal

The U.S. EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list was reviewed to determine if site(s) within 0.50 miles of the subject property are under investigation.⁸⁰ The CERCLIS database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment.

The EPA's *National Priorities List (NPL)* was reviewed to identify any sites within one mile of the project site.⁸¹ The project site was not listed as an NPL site. The nearest NPL site is a regional groundwater plume contaminated with chlorinated volatile organic compounds (VOCs), and is currently undergoing

⁸⁰ URS Corporation. *Phase I Environmental Site Assessment for the International Extrusion Corporation Property*. Phase I dated April 29, 2010.

⁸¹ To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a top priority site, pose a significant health or environmental threat, or be a site where the U.S. EPA has determined that remedial action is more cost-effective than removal action.

site investigation and remediation. The project site was investigated by the Los Angeles RWQCB as a potential source to this plume in 2000, as described in above and a 'No Further Action' letter was issued by the agency. Although the regional depth to groundwater is approximately 250 to 300 feet bgs, this regional plume may represent a REC to the project site.

Regulatory Setting - State

The *California Department of Toxic Substance Control (DTSC)* is authorized to implement the State's hazardous waste management program for the EPA. The EPA continues to regulate hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). CERCLA, commonly known as Superfund, was enacted by Congress in 1980. This law created a tax on the chemical and petroleum industries and provided broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. The California DTSC ENVIROSTOR database identifies both known and potential hazardous substances sites and formerly contaminated properties released for reuse, recorded environmental deed restrictions to prevent inappropriate land uses; and risk characterization information used to assess potential impacts to public health and the environment at contaminated sites.

The *California Environmental Protection Agency (Cal-EPA)* and the State Water Resources Control Board established rules governing the use of hazardous materials and the management of hazardous waste. Within the Cal-EPA, the Department of Toxic Substances Control (DTSC) has the primary regulatory responsibility for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of Title I of the Hazardous Waste Control Law (HWCL).

Assembly Bill 387 and Senate Bill 162 provide a comprehensive program to ensure that hazardous material contamination issues are adequately addressed prior to school development. The program involves the preparation of a Phase 1 Environmental Site Assessment to determine whether a release of a hazardous material has occurred on-site in the past or if there may be a naturally occurring hazardous material present within a site.

Regulatory Setting – Regional and County

The *Regional Water Quality Control Board (RWQCB)* mission is to develop and enforce water quality objectives and implementation plans that will best protect the State's waters, recognizing local differences in climate, topography, geology and hydrology. The Planning Area is located within RWQCB, Region 4, Los Angeles. Each regional board consists of seven part-time members appointed by the Governor and confirmed by the Senate. The Regional Boards are mandated to develop "basin plans" for their respective hydrologic areas, issue waste discharge requirements, take enforcement action against violators, and to monitor water quality.

The *Los Angeles County Fire Department (LACFD)* designated mission is to protect the public health and the environment throughout the County from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes. This is achieved through the coordinated efforts of inspections, emergency response, enforcement, and oversight. In 1982, the Los Angeles County Board of Supervisors established the Hazardous Materials Control Program in the Department of Health

Services for the inspection of businesses generating hazardous waste. In 1991, the program merged into the LACFD and it became the Health Hazardous Materials Division (HHMD). All Hazardous Material Specialists are sworn Los Angeles County Deputy Health Officers personnel. In 1997, HHMD became a Certified Unified Program Agency (CUPA) to administer the following programs within Los Angeles County: the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program (Cal-ARP), the Aboveground Storage Tank Program and the Underground Storage Tank Program.

Regulatory Setting - City of Commerce

The primary purpose of the Safety Element is to identify and assess the natural and man-made safety hazards that should be considered in the planning for future land uses and development. The following objective and policies are applicable to the proposed project.⁸²

- *Safety [Element] Policy 4.1.* The City of Commerce will ensure that appropriate mitigation measures relative to soil contamination and soils characteristics (subsidence, erosion, etc.) are required for development and redevelopment in order to reduce hazards.
- *Safety [Element] Policy 4.4.* The City of Commerce will work with Federal, State, and county agencies, as well as the Industrial Council, to protect all city residents and workers from hazardous materials and the risks associated with the transportation of these materials.
- *Safety [Element] Policy 4.5.* The City of Commerce will work with the Fire Department to enforce “right to know” laws.
- *Safety [Element] Policy 4.6.* The City of Commerce will maintain a city liaison officer who will continue to work with the Fire Department to monitor the production, use, and storage of hazardous materials.
- *Safety [Element] Policy 4.7.* The City of Commerce will establish an environmental review procedure that will assess the impact of new potentially hazardous industrial uses on adjacent residential neighborhoods.
- *Safety [Element] Policy 4.8.* The City of Commerce will work with the Los Angeles County Sheriff’s Department to enforce the use of the hazardous materials transport routes identified in the Public Safety Element.
- *Safety [Element] Policy 4.9.* The City of Commerce will encourage the proper disposal of hazardous waste materials produced, used, and stored within the city’s limits.

⁸² Commerce, City of. *City of Commerce 2020 General Plan, Section 7 Safety Element.* January 2008

Area 1 Site Conditions

Area 1 is situated along the northeastern side of Telegraph Road and was originally owned by Uniroyal, the historical successor to the Samson Tire Company. Parcel B consists of approximately 12.9 acres situated along the northeastern boundary of Parcel A and was owned by the Pacific Tube Company. Parcel C is a one acre parcel at the northern intersection of Parcels A and B, and at the southern intersection of Flotilla Street and Hoefner Avenue that was purchased in 2008.

In a previous Phase I ESA report dated April 2007, Block Environmental identified a former oil treatment plant situated on Parcel C on the 1949 and 1966 Sanborn Fire Insurance Maps for this area. Subsequently, Block Environmental performed a subsurface investigation in May 2007 on Parcel C. Subsurface soil samples were collected for field screening and analysis and soil vapor samples collected for volatile petroleum compounds. The report concluded that petroleum or metals impacts were not present on Parcel C. Further site assessment activities were not warranted.

Groundwater monitoring for volatile organic compounds (VOCs) in groundwater was being conducted to evaluate migration from the off-site former Pacific Tubing Company (PATCO) property. There are currently ten groundwater monitoring wells on the former PATCO property, located northwest of the subject property and now a part of the Citadel shopping center parking lot. Tetrachloroethylene (PCE), trichloroethylene (TCE), total chromium, and hexavalent chromium are reported in groundwater above the State of California maximum contaminant level (MCL) standards in monitoring reports prepared through 2009. The California Department of Toxic Substances Control (DTSC) has requested continued groundwater quality monitoring under work plans adopted under the PATCO voluntary cleanup agreement (VCA). The former PATCO vapor degreaser area (VDA) was located in a manufacturing building that included the subject property.

A Voluntary Cleanup Agreement (VCA) was executed between the DTSC and PATCO and based on documentation reviewed; approximately 11,000 tons of PCE solvent impacted soils were removed from the former VDA area in 2001 during the facility demolition. The area has subsequently been covered with pavement to prevent stormwater percolation through the former VDA. However, the volume of PCE was sufficient to migrate downward to the underlying groundwater table at approximately 88 feet below the ground surface. PCE and its degradation product, TCE remain in groundwater as shown in monitoring data for well UGW-4. PATCO signed a VCA with the DTSC in September 2001 specifically for the former VDA area that includes monitoring of the offsite migration of the PCE contamination. The DTSC Project Manager, Mr. Gabriel Farkas stated in 2010 that PATCO had filed for bankruptcy and that the previously agreed to work plan for groundwater monitoring had not been completed. There has been no change in the situation since 2010. Groundwater flow direction generally mimics the topography of the land. Groundwater monitoring conducted through 2009 on the adjacent Citadel property for a regional groundwater issue measured groundwater to be between 87 and 97 feet below ground surface and to flow to the south-southwest.

According to the State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), a plugged and abandoned oil/gas well is located in Area 1 underneath the building located at 5788 Smithway Street. In a letter dated January, 29, 2003, DOGGR stated, "...we have

determined that the requirements of this Division have been fulfilled relative to [the] plugging and abandonment of the well, removal of the well equipment and junk, and the filing of the well records.

Area 2 Site Conditions

Partner Engineering and Science, Inc. prepared a Phase I Environmental Site Assessment (ESA). The Phase I was prepared for the property located at 5809, 5819, 5901, 5903, 5933, and 6001 Telegraph Road, 2240 Gaspar Avenue, and 2300, 2311, 2322, and 2366 Travers Avenue. Partner observed small quantities of hazardous materials including inks, small quantities of motor, compressor and hydraulic oil, solvents (limited to less than one gallon), paints, aerosols, and other general maintenance products on-site. Hazardous materials observed at the subject property appeared to be stored properly, with the exception of small quantities of waste materials (primarily wax-based materials) stored in containers of 55 gallons or less on wooden pallets at 5901 Telegraph Road, with minor evidence of spills. The agency database report obtained from Environmental Data Resources, Inc. (EDR) identified the subject property under historical business names as follows:

- *Frazee Paint* (2366 Travers Avenue) appears in the HIST UST, CA FID UST, SWEEPS UST, Los Angeles Co. HMS, and EMI databases. Four USTs containing diesel, unleaded gasoline, lacquer thinner and wastewater were installed in 1984 and removed in 1993 with no evidence of release identified. A closure letter indicating no further action was required was issued on August 10, 1994 by LACDPW.
- *R&D Latex Corp and Mydrin Inc.* (5901 Telegraph Road) in the HIST UST, EMI, RCRA NonGen/NLR, FINDS, HAZNET, HIST CORTESE, LUST, EMI and CA FID UST databases. One 3,000 gallon UST containing diesel fuel was installed in 1988 and removed in 1990. Removal of impacted soil was performed in 1992 and a closure letter indicating no further action was required was issued on January 7, 1993 by LACDPW.
- *ACTT and Owens-Corning Fiberglass Company* (5933 Telegraph Road) in the RCRA NonGen/NLR, FINDS, HIST UST, CA FID UST, SWEEPS UST, LUST, HIST CORTESE, and Los Angeles Co. HMS databases. One 3,000-gallon UST containing diesel fuel was removed in 1988 and during removal activities an abandoned 6,000-gallon UST filled with slurry was encountered. Impacted soil was reportedly removed and soil vapor extraction was implemented from 1992 through 1994. A closure letter indicating no further action was required was issued on October 21, 1996 by LACDPW; however the abandoned 6,000-gallon slurry filled UST and TPH-impacted soil with concentrations ranging up to 7,200 mg/kg from approximately 25 to 35 feet bgs, below applicable regulatory action limits, was reportedly left in place.
- *Service Air Cargo* (D18, D19) at 6003 Telegraph Road in the SWEEPS UST, Los Angeles County HMS, and HIST UST databases. Two USTs (one 10,000-gallon and one 8,000-gallon) containing diesel fuel were installed in 1976 and prior to 1984 and removed in 1996 with no evidence of release identified. A closure letter indicating no further action was reportedly issued in 1997. Previous Phase I ESAs prepared in from 1999 through 2010 identified similar listings for the subject property.

The majority of the listings appear related to prior site operations. No current on-site USTs are reported, with the exception of one former UST reportedly abandoned in place by filling with slurry located at 5931/5933 Telegraph Road. Based on the lack of current violations and/or listing in other databases indicating a release, these former and current owner and tenant listings are not expected to have created an environmental concern at the subject property. Potential vapor intrusion concerns were identified from off-site facilities. As a result, a vapor barrier must be installed at 2240 Gaspar Avenue should a building be constructed within the site (Area 2).

Other businesses located in Area 2 include Justman Packaging and Displays (5819 Telegraph Road); American International Industries (5901/5903 Telegraph Road and 2366 Travers Avenue); E-Waste Center Inc. (5788 Smithway Street); and the City of Commerce (5933, 6001, and 6003 Telegraph Road). The remaining properties are developed with asphalt-paved parking lots (5809 Telegraph Road, 2240 Gaspar Avenue, and 2311 and 2322 Travers Avenue) or are vacant and unpaved. Justman's operations consist of design and digital printing of large format display and packaging for retail products and small quantities of inks and ink waste are used and stored on-site. American uses the three on-site buildings and exterior areas for extra warehouse storage of raw materials, empty 55-gallon drums, and finished personal care products from their adjacent off-site manufacturing facility to the northwest at 2220 Gaspar Avenue. The property is located northwest side of Gaspar Street to the southwest of Smithway Street in a mixed-use commercial and light industrial area. The property is currently was occupied by E-Waste Center, Inc., which is now closed. On-site operations previously consisted of a drop-off location for electronic waste. E-waste is was stored on-site prior to being dismantled and shipped off-site for recycling. ~~The subject property consists of a one-story building with loading docks, asphalt paved parking areas, and minimal landscaping.~~

The City of Commerce also used the vacant unpaved lots on the southeastern portion for stockpiling and storage of street construction materials and debris for an offsite street widening project. Partner observed small quantities of hazardous materials including inks, small quantities of motor, compressor and hydraulic oil, solvents (limited to less than one gallon), paints, aerosols, and other general maintenance products onsite. Hazardous materials observed at the subject property appeared to be stored properly, with the exception of small quantities of waste materials (primarily wax-based materials) stored in containers of 55 gallons or less on wooden pallets at 5901 Telegraph Road, with minor evidence of spills.

Area 3 Site Conditions

A Phase I Environmental Site Assessment was also performed for Area 3 and, based on the findings of the Phase I Environmental Site Assessment, potential or possible environmental conditions currently associated with the project site were identified. Along the northern site boundary, pole-mounted transformers were observed. Given the pre-1979 date of development of the subject site, the presence of polychlorinated biphenyls (PCB)-containing fluids in the transformer is suspected. However, no leakage or staining is visible on or around the transformers. Area 3 is not located on the DTSC Hazardous Waste and Substances database.⁸³ However, a portion of the site was identified as a Leaking Underground Storage Tank (LUST) cleanup site. This portion of the site (6241 Telegraph Road) was formerly occupied

⁸³ California Department of Toxic Substances Control. *Hazardous Waste and Substances Site List*. Website accessed March 8, 2017. https://www.dtsc.ca.gov/sitecleanup/cortese_list.cfm

by Boyd Furniture. The site came under the jurisdiction of the DTSC due to an existing leak, which released gasoline into the underlying soils. The case regarding the Boyd Furniture LUST was closed in 1993 and no further action is required.

The EPA's multi-system search was consulted to determine whether the project site is identified on any Federal Brownfield list; Federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List; Federal Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Facilities List; and/or Federal RCRA Generators List. Two former tenants, Boyd Furniture and California Furniture Shops, are included in the RCRA database, while Boyd Furniture is also listed in the Toxic Release Inventory database.⁸⁴ Boyd Furniture is listed in the RCRA database as a small quantity generator, although no further action is required for the portion of the project site that was occupied by the aforementioned use. The property that was occupied by Boyd Furniture is also listed in the Toxic Release Inventory (TRI) database. There were seven EPA regulated chemicals that were used in routine operations that took place between 1989 and 1998. These chemicals include: 1,1,1-Trichloroethane, Isopropyl alcohol, Methyl Ethyl Ketone, N-Butyl Alcohol, Toluene, and Xylene.

Entire Planning Area

The entire project area has been developed and there is a potential for certain hazardous materials being encountered during demolition, grading, and excavation activities. These materials included asbestos containing materials (ACMs), lead containing materials (LCMs), and polychlorinated biphenyls (PCBs). Each of the aforementioned hazardous materials and their on-site potential are discussed below:

- *Asbestos* is a naturally occurring mineral fiber that was historically utilized in a multitude of building material products.⁸⁵ ACMs are considered high risk materials for abatement and their removal is classified under Class I removal activities. Other building materials such as floor or ceiling tiles, siding, roofing, transite panels (floor sheeting, floor or roof mastics), are also considered to be potential sources of ACMs.
- *Lead and lead compounds* may be found in many types of paint. In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06% by weight in a dry film of newly applied paint. Lead based paints were commonly used on buildings built prior to 1970's. No buildings are located on the development site and, as a result, the potential for encountering lead containing compounds are minimal.
- *Polychlorinated biphenyls (PCBs)* were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. These substances have been listed as carcinogens by the USEPA. PCBs were banned from use in electrical capacitors, electrical transformers, vacuum pumps, and gas turbines in 1977.

⁸⁴ United States Environmental Protection Agency. *Environfacts-Multisystem Search*.
https://oaspub.epa.gov/enviro/rcrainfoquery_3.facility_information?pgm_sys_id=CAD981662778

⁸⁵ The USEPA has defined asbestos materials as being either friable or non-friable materials. Friable material is defined as easily being broken or crushed by hand pressure. Non-friable asbestos is generally found in pre-manufactured products that bind the asbestos in an adhesive material, such as roofing felts, floor tile, transite pipe, and mastics. Due to the ability to create a fiber release and cause human exposure during normal activities, the presence of friable asbestos is considered significant.

3.5.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project may be deemed to have a significant adverse impact if it results in any of the following:

- The proposed project's potential for creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project's potential for emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

3.5.4 ENVIRONMENTAL IMPACTS

3.5.4.1 THE PROJECT'S POTENTIAL FOR THE CREATION OF A SIGNIFICANT HAZARD THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS.

DISCUSSION OF IMPACT ANALYSIS

Construction projects, such as the one that would be undertaken for the proposed project, would require certain hazardous materials (fuels, adhesives, solvents), that, if improperly used and inadvertently released, could result in a temporary hazard to workers, the public, or the environment. However, the hazardous materials typically used on a construction site are transported onto the site packaged in consumer quantities and used in accordance with manufacturer recommendations. The overall quantities of the majority of these materials at any one time would not result in large bulk amounts that, if spilled, could cause a significant soil or groundwater contamination issue. However, the need to refuel heavy equipment at the site can require the storage of above ground storage tanks or refueling vehicles.

The use of construction best management practices (BMPs) typically implemented as part of construction activities are required by the Storm Water Pollution Prevention Plan (discussed further in Section 3.7, Hydrology and Water Quality). These BMPs would minimize the potential adverse effects to groundwater and soils and could include the following: adherence to the manufacturer's recommendations on use, storage, and disposal of chemical products used in construction; avoiding the over-topping of the construction equipment's fuel tanks; undertaking routine maintenance of construction equipment; and, the properly disposing of discarded chemical and fuel containers.

As indicated previously, because of the age of the onsite structures within Area 2 and Area 3, there is the potential for exposure to hazardous components in building materials and equipment, and potentially contaminated soil, which if disrupted can become a hazard. For this reason, demolition contractors must properly remove, handle, and dispose of these hazardous materials under agency oversight and in accordance with SCAQMD rules to minimize exposure to hazards. The implementation of this standard regulation would reduce impacts to a level of less than significant.

Typically, commercial/retail land uses do not generate, store, or dispose of significant quantities of hazardous materials. Such uses also typically do not normally involve dangerous activities that could expose persons onsite or in the surrounding areas to large quantities of hazardous materials. While the specific tenants are not known, general landscaping and maintenance will include the use of pest control, herbicide, and janitorial products such as commercial cleaners. Small quantities of hazardous materials would be used onsite, including cleaning solvents (such as degreasers, paint thinners, and aerosol propellants), paints and oil-based), acids and bases (such as many cleaners), disinfectants, and fertilizers. These substances would be stored in secure areas and would comply with all applicable storage, handling, usage, and disposal requirements (e.g., California Health and Safety Code Section 25531, et seq., governing accidental release prevention). The potential risks posed by the use and storage of these hazardous materials are primarily limited to the immediate vicinity of the materials. The transport of these materials would be performed by commercial vendors who would be required to comply with various federal and state laws regarding hazardous materials transportation (e.g., Federal Motor Carrier Safety Administration Regulations and 49 Code of Federal Regulations Parts 100-185).

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

Because of the age of the onsite structures that will be demolished, there is the potential for exposure to certain hazardous materials and potentially contaminated soil, which if disrupted can become a hazard. As a result, mitigation measures are required. The implementation of these measures would reduce impacts to a level of less than significant.

MITIGATION OF POTENTIAL IMPACTS

Implementation of the following mitigation measures will reduce the proposed project's emission of hazardous materials.

Mitigation Measure 11 (Hazards & Hazardous Materials). The preparation of a soil and demolition management plan (SMP) will be required. Grading and development should plan for removal of USTs, other subsurface features not removed during demolition, and potential management of visually impacted soil. Observation of grading and demolition operations under the SMP must be conducted.

Mitigation Measure 12 (Hazards & Hazardous Materials). The railroad spur line is likely impacted by petroleum hydrocarbons, arsenic, lead, and polynuclear aromatic hydrocarbons. When the line is removed, and if the soil is excavated and moved from the property, the soil will likely require sampling and special handling.

Mitigation Measure 13 (Hazards & Hazardous Materials). A vapor barrier must be installed at 2240 Gaspar Avenue should a building be constructed within the property (Area 2).

Mitigation Measure 14 (Hazards & Hazardous Materials). An Operations and Maintenance (O&M) Program must be implemented in order to safely manage the suspect ACMs and LBP located in the remaining buildings.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not have the potential for creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

3.5.4.2 THE PROPOSED PROJECT'S POTENTIAL FOR EMITTING HAZARDOUS EMISSIONS OR HANDLING HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL.

DISCUSSION OF IMPACT ANALYSIS

The project site is located 222 feet to the northeast of Rosewood Park High School, which is situated south of the I-5. Given the nature of the project, no hazardous or acutely hazardous materials will be emitted that may affect a sensitive receptor. As a result, no impacts from the operation of the future uses are anticipated. Construction projects, such as the one that would be undertaken for the proposed project, would require certain hazardous materials (fuels, adhesives, solvents), that, if improperly used and inadvertently released, could result in a temporary hazard to workers, the public, or the environment.

The hazardous materials typically used on a construction site are transported onto the site packaged in consumer quantities and used in accordance with manufacturer recommendations. The overall quantities of the majority of these materials at any one time would not result in large bulk amounts that, if spilled, could cause a significant soil or groundwater contamination issue. Additionally, the project will involve the grading of the site and the removal of the existing on-site improvements. During these activities, lead and/or asbestos containing materials as well as stained asphalt, concrete, and contaminated soil may be encountered. The handling, removal, and disposal of the aforementioned items are governed by State and Federal regulations. Furthermore, the project contractors must adhere to the mitigation measures outlined in the preceding subsection.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The project's potential impacts are considered to be less than significant with the adherence to the above-mentioned mitigation measures provided in subsection 3.5.4.1.

MITIGATION OF POTENTIAL IMPACTS

The implementation of the previously identified following mitigation measures will reduce the proposed project's emission of hazardous materials.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not have the potential for emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

3.6 HYDROLOGY & WATER QUALITY IMPACTS

This section of the EIR discusses the Planning Area's existing hydrology and the potential for water quality and drainage impacts. Area 1 is currently fully developed and is largely covered over in impervious surfaces. Area 2 and Area 3 were formerly developed though the portions are covered in pervious surfaces consisting of graded earth.

3.6.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The environmental analysis undertaken as part of the Initial Study's preparation indicated this EIR should evaluate the following hydrology and water quality issues:

- The proposed project's potential for violating any water quality standards or waste discharge requirements.
- The proposed project's potential for substantially depleting groundwater supplies or interfering substantially with groundwater recharge in such a way that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- The proposed project's potential for substantially altering the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.
- The proposed project's potential for substantially altering the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in flooding on- or off-site.
- The proposed project's potential for creating or contributing runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- The proposed project's potential for substantially degrading water quality.

3.6.2 ENVIRONMENTAL SETTING

There are a number of existing regulations applicable to any new development that will be effective in further reducing potential water and hydrology impacts. Those existing regulations that will serve as standard conditions with respect to water and hydrology are summarized below and on the following pages:

Regulatory Setting – Federal

The *Clean Water Act (CWA)* is the primary Federal law in the United States governing water pollution. The act established the symbolic goals of eliminating releases of toxic substances into the water, eliminating additional water pollution, and ensuring that surface waters would meet standards necessary for human sports and recreation. The U.S. Army Corps of Engineers regulates the discharge of dredged or fill material into Waters of the United States under Section 404 of the CWA. Waters of the U.S. include a range of wetland environments such as lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, and wet meadows.

U. S. Army Corps of Engineers, Section 404 Guidelines. The Federal Government's Section 404 Guidelines prohibit the issuance of wetland permits for projects that would jeopardize the existence of threatened or endangered wildlife or plant species. The U.S. Army Corps of Engineers must consult with the U.S. Fish and Wildlife Service (USFWS) and National Oceanic Atmospheric Administration (NOAA) when threatened or endangered species may be affected by a proposed project to determine whether issuance of Section 404 permit would jeopardize the species.

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Mapping Program. The Federal Emergency Management Agency oversees the preparation of maps that indicates those areas where there is a potential for inundation resulting from a 100-year flood and a 500-year flood. The maps serve as the basis as to whether flood insurance is required for homeowners. The mapping program serves an additional purpose in designating those areas of the City where flood-related mitigation may be required.

National Pollutant Discharge Elimination System (NPDES). The system for granting and regulating discharge permits is called the National Pollutant Discharge Elimination System (NPDES), which regulates both point and non-point sources that discharge pollutants into waters of the United States. This regulation requires operators of regulated small municipal separate storm sewer systems to obtain a NPDES permit and develop a storm water management program that will prevent pollutants from being conveyed in storm water runoff into the storm sewer systems (or from being dumped directly into the storm drains). Key requirements of the NPDES permit include measures to be imposed during construction activities, handouts for residential uses, and best management practices (BMPs) for nonresidential uses.

Regulatory Setting – State

The *Porter-Cologne Water Quality Control Act (CWA)*. In the State of California, the State Water Resources Control Board (SWRCB) and local Regional Water Quality Control Boards (RWQCBs) have assumed the responsibility of implementing the EPA's NPDES Program and other programs under the CWA. The primary water quality control law in California is the Porter-Cologne Water Quality Act (Water Code Sections 13000 et seq.). Under this Act, the SWRCB issues joint Federal NPDES Storm Water permits and State Waste Discharge Requirements (WDRs) to operators of municipal storm water and sewer systems (MS4s), industrial facilities, and construction sites to obtain coverage for the storm water discharges from these operations.

Regulatory Setting – City of Commerce

City of Commerce Municipal Code Title 6 – Health and Sanitation, Chapter 6.17 – Stormwater and Runoff Pollution Control. The purpose of this chapter is to comply with the Federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the Municipal National Pollutant Discharge Elimination System (NPDES) Permit. The City of Commerce will accomplish complete compliance with all applicable regulations by reducing pollutants in stormwater discharges to the maximum extent practicable; regulating illicit connections and illicit discharges, thereby reducing the level of contamination of stormwater and dry weather runoff into the Municipal Separate Storm Sewer System (MS4) of the City of Commerce (city); and regulating non-stormwater discharges to the MS4. The intent of this chapter is to protect the health and safety of the residents of the city and enhance and protect the water quality of the receiving waters of the city and the United States, consistent with the Federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the municipal NPDES permit.

The City of Commerce Municipal Code Title 19 – Zoning, Chapter 19.33 – Low Impact Development. The provisions of Chapter 19.33 contain requirements for construction activities and facility operations of Development and Redevelopment projects to comply with the current "municipal NPDES permit," lessen the water quality impacts of development by using smart growth practices, and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. This section contains requirements for stormwater pollution control measures in development and redevelopment projects and authorizes the City to further define and adopt stormwater pollution control measures, to develop LID principles and requirements, including but not limited to the objectives and specifications for integration of LID strategies, and to grant waivers or alternate compliance as allowed by the municipal NPDES permit and collect fees from projects granted exceptions. The site for every planning priority project shall be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. In addition, the preparation of a LID plan is required as part of this chapter.

The *City of Commerce 2020 General Plan*, the Safety Element and the Resource Management Element, indicates those areas of the City where there is a potential for flooding. Where flooding has been identified, special policies, programs, or other mechanisms must be considered as a means to reduce the damaging effects of potential flooding. The City of Commerce General Plan contains policies that regulate hydrology and water quality in the proposed project area. The Resource Management and Safety Elements of the General Plan identify the following objectives and policies related to hydrology and water quality in the project area:

- *Resource Management [Element] Policy 1.1.* The City of Commerce will do its part in the conservation and protection of air, water, energy, and land in the Southern California region.
- *Resource Management [Element] Policy 1.2.* The City of Commerce will cooperate, to the degree necessary, with federal, state, and county agencies, and surrounding cities, in the maintenance and improvement in the quality of local groundwater.

- *Safety [Element] Policy 4.2.* The City of Commerce will work with other agencies to reduce the potential flood hazard in the City.
- *Safety [Element] Policy 3.3.* The City of Commerce will continue to request local water purveyors to provide the city with periodic reports concerning water quality.

Regional Surface Water Characteristics

The project site is located within the Los Angeles River Upper Reach 2 Sub Watershed, which is part of the larger Los Angeles River Watershed. The Los Angeles River flows 51 miles from the Santa Monica Mountains, in the west San Fernando Valley, to Long Beach Harbor, San Pedro Bay, and the Pacific Ocean. Including tributaries, the 824 square mile watershed has a total stream length of about 837 miles with about 4.6 square miles of lake area. The watershed includes steep, easily eroded, undeveloped mountainous areas in the Angeles National Forest and large urban areas in the midsection and south. Los Angeles River Reach 2 begins at the Arroyo Seco confluence and ends at the Compton Creek confluence.

The primary Reach 2 tributary is the Rio Hondo River. The 120 square mile Rio Hondo sub-watershed drains a large portion of the eastern Los Angeles River Watershed. Reach 2 of the Rio Hondo is located north of the Santa Ana Freeway, while Reach 1 stretches from the Freeway south to its confluence with the Los Angeles River. During storm events, flows in Rio Hondo Reach 2 are diverted to the adjacent Rio Hondo Spreading Grounds and used to recharge the central basin groundwater aquifer. When the Spreading Grounds are not operating, the Rio Hondo flows into Rio Hondo Reach 1 and the Los Angeles River.

The total area of the Los Angeles River Upper Reach 2 Watershed Management Area is approximately 14,215 acres, or 22.21 square miles, and it is located the lower half of the Los Angeles River Watershed, beginning at about East 26th Street, in the City of Vernon, and ending at Patata Street, in the City of Cudahy. The Cities of Bell Gardens and Commerce are along the western bank of the Rio Hondo.⁸⁶

Groundwater

The City of Commerce is located within the central section of the Downey Plain, and is underlain by the Central groundwater basin. Water-bearing deposits found beneath the Downey plain include unconsolidated and semi-consolidated marine and non-marine alluvial sediments that yield significant amounts of groundwater. The Central Basin is bounded on the north by the Elysian and Repetto Hills; on the northeast by the Merced and Puente Hills; on the east by the Los Angeles County line and on the southwest by the Newport-Inglewood fault along the Rosecrans, Dominguez, Signal, and Bixby Ranch Hills.

Groundwater resources in the Central Basin consists of a body of shallow, unconfined and semi-perched water on the upper part of the alluvial deposits; the principal body of fresh groundwater within the Recent and Pleistocene deposits; and salt water under the freshwater resources. Groundwater basins are

⁸⁶ CWE Corp. *Los Angeles River Upper Reach 2 Watershed Management Area Coordinated Integrated Monitoring Program (CIMP)*. June 26, 2014. https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/watershed_management/los_angeles/upper_reach2/15-01-27LARUR2WMARevWMP.pdf

recharged by surface and subsurface flows from the bordering hills and mountains; by downward percolation of waters from major streams; and by direct percolation of rain and artificial recharge at spreading basins or injection wells. The discharge of the groundwater is through pumping for domestic use and flows to the ocean through sewers and drainage channels. Water-bearing deposits are unconsolidated and semi-consolidated alluvial sediments that hold water and allow water to pass through, and are referred to as aquifers. Non-water-bearing deposits are consolidated rocks and ground layers which provide limited water and form the boundaries between aquifers.

Flood Hazards and Flood Zone Designation

Large-scale flooding in Commerce could result from the failure of the Garvey Reservoir Dam, located in Monterey Park, or flooding from the Los Angeles or Rio Hondo Rivers. Failure of the Garvey Reservoir (located approximately two miles southeast of the intersection of Garfield Avenue and Graves Avenue in Monterey Park) could reach the city approximately 15 minutes after initial failure of the dam. Floodwaters would primarily impact industrial and commercial development, although portions of the Rosewood, Bandini-Rosini, and Southeast planning areas may also be inundated.

The Los Angeles and Rio Hondo Rivers convey floodwaters from the upper San Gabriel and San Fernando Valleys, through central Los Angeles County, and ultimately to the Long Beach Harbor. In the event of system overload, isolated portions of the City may be subject to flooding. In particular, the Veteran's Memorial Park area and industrial development south of Slauson Avenue could be flooded. The majority of the city, however, is located outside of any flood zone designated as such by the Federal Emergency Management Agency (FEMA).⁸⁷ According to the Federal Emergency Management Agency (FEMA) flood insurance map obtained from the Los Angeles County Department of Public Works, the project area is located in Zone X.⁸⁸ This flood zone has an annual probability of flooding of less than 0.2% and represents areas outside the 500-year flood plain.⁸⁹

Planning Area Hydrologic Setting

The existing site consists of ±36.5 acres of developed and vacant land that generally drains from the northwest toward the southeast direction. The site is 55% impervious and approximately 60% of the site is developed with light industrial buildings and associated parking lots. The site runoff travels via surface flow to Gaspar Avenue, Travers Avenue, and Telegraph Road. There is an existing Los Angeles County Flood Control District facility Project No. 2501, Unit 3, Line C, which varies in size from 51-inch to 60-inch in diameter, which is a reinforced concrete pipe (RCP) storm drain under Telegraph Road and fronting along the Planning Area's south side. There is also a 24-inch RCP storm drain under Travers Avenue that confluences with the 51-inch storm drain in Telegraph Road.

⁸⁷ City of Commerce. *2020 General Plan – Safety Element*. Plan adopted January 2008.

⁸⁸ Los Angeles County Department of Public Works. *Flood Zone Determination Website*. <http://dpw.lacounty.gov/wmd/floodzone/>

⁸⁹ FEMA. *Flood Zones, Definition/Description*. <http://www.fema.gov/floodplain-management/flood-zones>

The Planning Area is within the Los Angeles River Watershed and the storm runoffs are conveyed to the Los Angeles River by the aforementioned County of Los Angeles Flood Control storm drain. The surface runoff from the subject site ultimately flows into catch basins that drain into the County storm drain. The site currently does not support any existing on-site detention facilities or any water quality treatment systems.⁹⁰

Area 3 is currently partially developed with an existing retail building and paved parking lot area. The majority of the existing site is vacant with some stockpiled materials on it. Area 3 is 10.61 acres and is 37.0% impervious. In the existing condition, storm water flows southwesterly towards Telegraph Road and is picked up in curb opening catch basins that connect to the eight feet by nine feet RCB (LACDWP Plan PD 031289) in Telegraph Road. The RCB storm drain ultimately discharges into Rio Hondo Channel, the Los Angeles River and Pacific Ocean.⁹¹

3.6.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, in its capacity as Lead Agency, a project may be deemed to have a significant adverse impact if it results in any of the following:

- The proposed project's potential for violating any water quality standards or waste discharge requirements.
- The proposed project's potential for substantially depleting groundwater supplies or interfering substantially with groundwater recharge in such a way that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- The proposed project's potential for substantially altering the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.
- The proposed project's potential for substantially altering the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in flooding on- or off-site.
- The proposed project's potential for creating or contributing runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- The proposed project's potential for substantially degrading water quality.

⁹⁰ DRC Engineering, Inc. *Citadel Outlets Expansion Phases 5 & 6 36.5 Acres on Telegraph Road at Gaspar Avenue Commerce, California 90040*. December 10, 2017

⁹¹ DRC Engineering, Inc. *Hydrology Report for Mixed-Use Project (10.61 Acres) Telegraph Road and Washington Boulevard Commerce, California 90040*. December 10, 2017

3.6.4 ENVIRONMENTAL IMPACTS

3.6.4.1 POTENTIAL FOR VIOLATING WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS.

DISCUSSION OF IMPACT ANALYSIS

The project drains into the Los Angeles River which is listed on the State Water Board planned a list of impaired water bodies and in the Tier 3 Pollutants of Concern as contained in the LID Manual. The Los Angeles River is listed for ammonia, high coliform count, lead, nutrients (algae) odors, oil, and scum/foam unnatural. The Tier 3 POCs are pH, E. coli bacteria, chloride, total nitrogen, sulfate, TDS, turbidity, aluminum, cyanide, copper, mercury, and selenium. Anticipated pollutants associated with commercial developments, as identified in Table 7-3 of the LID Manual, are suspended solids, total phosphorous, total nitrogen, total copper, total lead, and total zinc. Other common pollutants of concern include trash/debris and oil/grease from the parking areas.

The treatment flow rate will be treated through the biotreatment systems just described. Biotreatment using the sand/compost mix has been found to have high to medium removal rates for nitrogen, chromium, lead and also is effective at removal of sediments, oil and grease, phosphorus, metals, organic compounds, trash and debris, and pathogens (bacteria and viruses). The use of biofiltration basins will facilitate proper treatment and discharge of storm water runoff by using plants to capture and biologically degrade pollutants carried by storm water runoff. Biofiltration/retention areas also reduce the volume of storm water runoff discharged into the local storm drains.⁹² These facilities normally consist of a grass buffer strip, sand bed, ponding area, organic layer or mulch layer, planting soil, and plants. The runoff's velocity is reduced by passing over or through a sand bed and is subsequently distributed evenly along a ponding area.

Based on infiltration testing by the geotechnical engineer, infiltration is infeasible for the project site due to unfavorable infiltration test result and soil stratigraphy per infiltration testing conducted by GPI Geotechnical (see Appendix D). The infiltration rate for the project site is 0.2 inches/hour which is less than the minimum required infiltration rate of 0.3 inches/hour according to the LID manual, and is therefore not a viable treatment method for this site.

The project will not create any hydrologic conditions of concern, as all storm water runoff from the site will be conveyed to proposed underground detention basins that will only restrict flow rate discharges to the same or less the Allowable Q discharge rate designated by the Los Angeles County Department of Public Works, Design Division, Hydraulic Analysis Unit. Outflow discharges from the detention basins will enter the existing concrete-lined storm drain in Telegraph Road and Hoefner Avenue. Therefore, hydromodification is not an issue of concern for this site.

⁹² California Department of Transportation. *Biofiltration Strips*. http://www.dot.ca.gov/hq/LandArch/16_la_design/guidance/ec_toolbox/stormwater/biofiltration_strips.htm

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project will not result in the introduction of contaminated runoff into the local storm drains with the adherence to the construction and operational BMPs identified in the LID report.

MITIGATION OF POTENTIAL IMPACTS

The project's implementation will not require any additional mitigation measures beyond what is recommended by the preparers of the LID report.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project's potential for violating any water quality standards or waste discharge requirements.

3.6.4.2 POTENTIAL FOR DEPLETING OR INTERFERING WITH GROUNDWATER SUPPLIES OR RECHARGE.

DISCUSSION OF IMPACT ANALYSIS

Grading related activities are not anticipated to deplete groundwater supplies from any underlying aquifer or interfere with any groundwater recharge activities. The footings that will be installed to accommodate the majority of the buildings will not extend more than ten feet below the surface. In addition, the proposed project will be connected to the City's water lines and is not anticipated to deplete groundwater supplies through the consumption of the water. The project will be required to install Xeriscape landscaping and water efficient appliances to reduce the burden placed on the City's water resources. Future water consumption will be limited to that used for landscaping, restroom use, and routine maintenance and cleaning. The project Applicant will be required to adhere to the applicable BMPs for the construction site. Adherence to the required BMPs will restrict the discharge of contaminated runoff into the local storm drain system. As a result, the impacts are anticipated to be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project will not result in the introduction of contaminated runoff into the local storm drains with the adherence to the construction and operational BMPs identified in the LID report.

MITIGATION OF POTENTIAL IMPACTS

The impacts will be less than significant with the implementation of the required BMPs identified in the LID report.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in significant impacts to any adopted air quality plan. As a result, the proposed project's potential for substantially depleting groundwater supplies or interfering substantially with groundwater recharge in such a way that would cause a net deficit in

aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

3.6.4.3 POTENTIAL FOR SUBSTANTIALLY ALTERING THE EXISTING DRAINAGE PATTERN LEADING TO EROSION OR SILTATION.

DISCUSSION OF IMPACT ANALYSIS

The Applicant will prepare a LID report that will identify both construction and post-construction (operational) BMPs. The implementation of the required BMPs will improve the quality and reduce the quantity of stormwater runoff by facilitating proper filtration and percolation of excess runoff. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site.

Additionally, the project site is located 1.80 miles to the northeast of the channelized Los Angeles River.⁹³ The proposed project will be restricted to the designated sites and will not alter the course of the Los Angeles River. In addition, the project will not substantially alter the site's natural drainage patterns because previous construction activities may have altered this site's original drainage patterns. No other bodies of water are located in and around the project site. As a result, the impacts are considered to be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project would not result in significant impacts to the existing drainage pattern resulting in substantial erosion on- or off-site.

MITIGATION OF POTENTIAL IMPACTS

The impacts will be less than significant with the implementation of the required BMPs identified in the LID report.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not substantially altering the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.

⁹³ Google Earth. Website accessed January 24, 2019. <https://www.google.com/maps>

3.6.4.4 POTENTIAL FOR ALTERING THE EXISTING DRAINAGE PATTERN LEADING TO FLOODING.

DISCUSSION OF IMPACT ANALYSIS

The building contractors will be required to adhere to the applicable LID report that identifies both construction and post-construction (operational) BMPs. The implementation of the required BMPs will improve the quality and reduce the quantity of stormwater runoff by facilitating proper filtration and percolation of excess runoff. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site.

The Planning Area is located 1.80 miles to the northeast of the channelized Los Angeles River.⁹⁴ The proposed project will be restricted to the designated sites and will not alter the course of the Los Angeles River. In addition, the project will not substantially alter the site's natural drainage patterns because previous construction activities may have altered this site's original drainage patterns. No other bodies of water are located in and around the project site. As a result, the impacts are considered to be less than significant.

Runoff waters would be discharged in a manner to prevent downstream or off-site flooding, erosion, or sedimentation in accordance with City and SWMP requirements. The drainage system is designed to meet all City requirements and will take into account future potential sources of incoming flow when sizing the public storm drain portion of the system. Erosional and water quality impacts would be mitigated through implementation of the SWPPP during construction and through the drainage control requirements set by City and State requirements. Also, any impacts would be further mitigated through a series of site-specific BMPs and a drainage system that will be designed to handle a 25-year storm event pursuant to City regulations and local SWMP requirements.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project would not create a drainage pattern that would result in flooding on- or off-site.

MITIGATION OF POTENTIAL IMPACTS

The impacts will be less than significant with the implementation of the required BMPs identified in the LID report. No additional mitigation beyond the project design features is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential for substantially altering the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner, which would result in flooding on- or off-site.

⁹⁴ Google Earth. Website accessed January 24, 2019. <https://www.google.com/maps>

3.6.4.5 POTENTIAL FOR CREATING OR CONTRIBUTING RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORM WATER DRAINAGE SYSTEMS.

DISCUSSION OF IMPACT ANALYSIS

The hydrology calculations for the project are based on the Los Angeles County Department of Public Works (LADPW) Hydrology Manual (January 2006 edition). Location maps, precipitation values, and soil values have all been interpolated from the LADPW Manual and can be found in Appendix C of the LADPW Hydrology Manual. Existing and proposed site conditions are analyzed using the LA County HydroCalc program to produce pre and post-construction flow rates for the 25-year storm event. The 25-year storm event is being analyzed as the design storm in accordance with LA County Hydrology Manual Urban Flood Protection requirements.

The hydrologic analysis for the proposed site was performed by analyzing three drainage areas; Areas “A”, “B” and “C.” The storm run-off flows from Area “A” will flow into an existing 51-inch RCP storm drain (LACDPW Plan PD-035812) and Area “B” drains into the existing 60-inch RCP storm drain (LACDPW Plan PD-035810) under Telegraph Road and run-off flows from Area “C” drains to an existing 42-inch storm drain (LACDWP Plan PD-035813) under Gaspar Avenue. The longest existing flow path for the drainage areas was selected and an average slope of the path calculated.

The proposed site is designed to convey the 25-year peak runoff from the site into the public storm drains providing protection to the proposed on-site buildings and the downstream public facilities. The existing project site discharges storm water into the public right-of-way on Telegraph Road. The proposed site will be designed to discharge storm water via a storm drain that connects to the public storm drain in Telegraph Road. The on-site system is designed to handle the 25-year storm event. Any flow in excess of the 25-year event will discharge onto the public streets via surface flow through parkway drains. The project will discharge runoff from the site at a rate below the County designated Allowable Q of 0.69 cfs/acre which is well below the pre-existing site condition.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The construction of the proposed project would be required to construct all new drainage infrastructures in accordance with NPDES and City SWMP requirements, which are based on its MS4 permit from the RWQCB. Compliance with applicable permitting requirements and design standards associated with storm water runoff, grading and drainage, and infrastructure design as part of the construction and operation of the proposed project will not result in exceeding existing or planned storm water drainage systems or provide a substantial source of polluted runoff. These requirements state that storm-water must be controlled to limit the offsite transport of pollutants to the maximum extent practical.

MITIGATION OF POTENTIAL IMPACTS

No additional mitigation beyond the project design features is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential for creating or contributing runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

3.6.4.6 PROJECT'S POTENTIAL FOR SUBSTANTIALLY DEGRADING WATER QUALITY.

DISCUSSION OF IMPACT ANALYSIS

The NPDES storm water permitting program regulates storm water quality from construction sites. The developer would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for coverage under the State-wide storm water discharge NPDES permit. The SWPPP should contain a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must list any BMPs the discharger will use to protect storm water runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program.

Specific BMPs that may be applicable would include establishment of sediment basins and erosion control perimeter around active construction and contractor layout areas, silt fencing, jute netting, straw wattles, or other appropriate measures to control sediment from leaving the construction area. These temporary features serve to trap and absorb pollutants and sediments before they can leave the area.

Construction contractors would be made aware of the required BMPs and good housekeeping measures for the project site and associated construction staging areas. Construction debris and waste materials would be collected at the end of each day and properly disposed in trash or recycle bins. For this project, implementation of standard BMPs will adequately protect against both typical and accidental discharges. Therefore, with the implementation of standard BMPs during construction and operations, impacts to water quality standards from the proposed project will be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

Compliance of the proposed project with regulations (NPDES and SWMP) as described above governing storm water discharge will result in no substantial degradation of water quality.

MITIGATION OF POTENTIAL IMPACTS

The impacts will be less than significant with the implementation of the required BMPs identified in the LID report. No additional mitigation beyond the project design features is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not have a potential for substantially degrading water quality.

3.7 LAND USE & PLANNING IMPACTS

This section of the EIR discusses the proposed projects impacts as they relate to conformity with the adopted land use plan that is applicable to the Planning Area.

3.7.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the General Plan, directed the preparation of an Initial Study to determine the nature and scope of the analysis of land use and planning impacts that would be required as part of this EIR's preparation. The preliminary environmental analysis indicated the EIR should evaluate the following:

- The proposed project's potential for conflicting with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

3.7.2 ENVIRONMENTAL SETTING

There are a number of existing regulations that will be applicable to any new development and these policies and regulations will be effective in further reducing potential land use impacts.

Regulatory Setting – Regional Planning Agencies

The *Southern California Association of Governments (SCAG)* is a regional planning organization that works with local governments in its six member counties—Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura—to develop regional goals and address challenges to meeting those goals. SCAG publishes three documents that clearly state the goals and policies of the region: the Regional Comprehensive Plan (RCP), the Compass Blueprint and 2% Strategy, and the Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS).

The proposed project will be evaluated with respect to conformity with these regional planning documents. The RCP serves as an advisory document to local cities and other governmental agencies in the Southern California region.⁹⁵ The RCP combines the planning and policy work performed by the SCAG into one all-encompassing document. It serves as a reference to transportation commissions, environmental organizations, local governments, and other key planning stakeholders. Guidelines in the RCP that are relevant to the proposed plan are as follows:

- SCAG shall successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy:
- Focusing growth in existing and emerging centers and along major transportation corridors.

⁹⁵ Southern California Association of Governments. 2008. <http://www.scag.ca.gov/rcp/index.htm>.

- Creating significant areas of mixed-use development and walkable, “people-scaled” communities.
- Targeting growth in housing, employment, and commercial development within walking distance of existing and planned transit stations.
- Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings, and building new businesses and housing on vacant lots.

The 2016-2040 *Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS)*. The RTP/SCS focuses on improving the balance between land use and current as well as future transportation systems. SCAG develops, maintains, and updates the RTP/SCS on a four-year cycle. The RTP/SCS also contains specific land use policies aimed at promoting sustainable growth. The 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS.

Regulatory Setting – City of Commerce

The *City of Commerce General Plan* serves as the blueprint for future growth and development in Commerce. The adopted Commerce General Plan Land Use Map indicates the location and extent of permitted uses in the City. The Community Development Element designates the general distribution and intensity of land use and development within the land area governed by the general plan. This Element complies with the state requirements for a land use element. The land use applicable to the project sites are *Commercial* and *Commercial Manufacturing*. The following General Plan Policies are directly applicable to the Planning Area.⁹⁶

- *Community Development [Element] Policy 1.3.* The City of Commerce will continue to implement specific standards for new commercial developments located adjacent to residential neighborhoods in order to ensure that adequate buffers are provided so that negative impacts such as noise, light pollution, truck use, and traffic may be mitigated.
- *Community Development [Element] Policy 1.7.* The City of Commerce will promote site plans for new development located in the vicinity of Washington Boulevard that encourages primary access from Washington Boulevard for those businesses located along the roadway (as opposed to the use of alleyways).
- *Community Development [Element] Policy 2.1.* The City of Commerce will continue to promote the development of a quality retail and commercial entertainment district in the vicinity of Telegraph Road, north of the Santa Ana Freeway.
- *Community Development [Element] Policy 2.3.* The City of Commerce will promote the development of larger, more efficient, commercial retail shopping centers as opposed to smaller “strip commercial” centers.

⁹⁶ Commerce, City of. *City of Commerce 2020 General Plan, Section 3 Community Development Element*. January 2008

- *Community Development [Element] Policy 2.4.* The City of Commerce will continue to preserve and promote the improvement of the existing commercial areas, including the Commerce Center, the Telegraph Road/Washington Boulevard area, the Atlantic/Washington Redevelopment Project Area, the Commerce Business Park, and the commercial properties located along Slauson Avenue.
- *Community Development [Element] Policy 2.8.* The City of Commerce will continue to encourage the development of a high-intensity, highly visible commercial corridor consisting of offices, hotels, and retail and entertainment uses along Telegraph Road, extending from Hoefner Avenue to Vail Avenue.
- *Community Development [Element] Policy 2.10.* The City of Commerce will continue to provide safe, convenient pedestrian linkages across and along streets containing strip commercial businesses.
- *Community Development [Element] Policy 4.1.* The City of Commerce will explore the feasibility of developing an area devoted to active family recreation.
- *Community Development [Element] Policy 4.2.* The City of Commerce will promote the development of commercial enterprises that provide family entertainment.
- *Community Development [Element] Policy 4.3.* The City of Commerce will continue to promote the development of the Citadel and neighboring areas as a focal point for family entertainment.

Existing Land Use and Development

The existing Citadel complex as a whole contains a variety of commercial retail, office, hotel, and entertainment-related uses. The Citadel complex, which contains both retail and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located in between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3).

The west side of Area 2 is currently occupied by Justman Packaging and Display, ancillary parking, and a vacant building. The east side of Area 2 is largely undeveloped and is covered over in dirt, sparse ruderal vegetation, and mounds of dirt and gravel. An abandoned warehouse is located within the southwest corner of east side of Area 2. Area 3 is located at the northwest corner of the Telegraph Road/Washington Boulevard intersection. A majority of this site is undeveloped, though a building occupied by Furniture Clearance Warehouse is located at the site's southwest corner. The portions of the site that are currently undeveloped are covered over in dirt, sparse ruderal vegetation, gravel, and remnants of concrete surfaces. Commercial uses including a Costco, McDonalds, and various industrial/warehouse buildings occupy the parcels located east of Washington Boulevard and Telegraph Road.⁹⁷

⁹⁷ Blodgett Baylosis Environmental Planning. *Site Survey* (October 8, 2018 through January 7, 2019)

The existing development within the three project areas (Area 1, Area 2, and Area 3) total 190,243 square feet including 79,375 square feet in Area 1; 88,368 square feet in Area 2; and 22,500 square feet in Area 3. The existing vacant and undeveloped parcels were previously occupied by development that has since been demolished.

The existing Citadel Outlet complex contains a variety of commercial retail, office, and hotel uses. The main Citadel complex, which contains both retail and office uses, is located to the west of Area 2. The Commerce Casino, located east of Tubeway Avenue, is located between Area 2 and the Telegraph Road/Washington Boulevard project site (Area 3). The existing land uses and development within the three areas are summarized in Table 3-10.

Table 3-10
Summary of Existing Uses within Project Area

Area	Use	Name	Bldg. Area (sq. ft.)	Address
Area 1	Surface Parking	NA	NA	NA
	Industrial Bldg.	Unicorp & Uninex Intl.	38,750 sq. ft.	5780 Smithway St.
	Industrial Bldg.	New Unoccupied Bldg.	40,625 sq. ft.	5788 Smithway St.
Area 2	Industrial Bldg.	Justman Packaging & Display	14,744 sq. ft.	5819 Telegraph Rd.
	Industrial Bldg.	Vacant Bldg.	36,812 sq. ft.	2366 Travers Ave.
	Industrial Bldg.	Vacant Bldg.	36,812 sq. ft.	5901 Telegraph Rd.
	Vacant Land	Grading and Site Preparation	NA	NA
Area 3	Vacant Land	Graded Land	NA	NA
	Commercial Bldg.	Los Angeles Furniture Online	22,500 sq. ft.	6241 Telegraph Rd.

1. Reference indicates the corresponding photograph provided in Exhibits 2-4 through 2-7.
Source: Blodgett Baylosis Environmental Planning and Los Angeles County Tax Assessor

3.7.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, in its capacity as Lead Agency, a project may be deemed to have a significant adverse impact if it results in any of the following:

- The proposed project's potential for conflicting with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

3.7.4 ENVIRONMENTAL IMPACTS

3.7.4.1 PROJECT'S POTENTIAL FOR CONFLICTING WITH AN APPLICABLE LAND USE PLAN, POLICY, OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT.

DISCUSSION OF IMPACT ANALYSIS

Portions of the Planning Area will require a number of Zone Changes to accommodate the proposed uses. The first set of zone changes, from M-2 (*Heavy Industrial*) to C-2 (*Commercial*), will be required for two sites located in Area 1. Area 3 will also require up to two zone changes. First, the site for the proposed industrial building will need to be rezoned to M-2 (Heavy Industrial) to C-2 (Commercial) to permit the proposed use industrial building. In addition, if an institutional/public/government facility is ultimately located within Area 3, development site must be zoned CPF (Commercial Public Facility Zone) to allow for the proposed use. The proposed land uses and development for the three project areas are summarized below in Table 3-11.

Table 3-11
Summary of Proposed Uses within Project Area

Area	Project Element	Details	Description
Area 1	Building 20 Retail	15,000 sq. ft.	Three level commercial retail building.
	Building 21 Retail	107,150 sq. ft.	One and two level multi-tenant retail building.
	Traveler's Hotel	80,000 sq. ft.	Five level, 174 room hotel.
	Loft Hotel	93,000 sq. ft.	Five level, 96 room hotel.
	Food/Retail	45,571 sq. ft.	Restaurant and retail uses.
	Parking Structure	750 spaces	Four level parking structure containing 750 spaces.
	New Parking Structure	630 spaces	Six level parking structure containing 630 spaces.
	Parking Structure Expansion	238 spaces	Expansion of existing five level parking structure 238 spaces.
Area 2	Building 22 Retail	46,834 sq. ft.	Single and two level multi-tenant retail spaces.
	Building 23 Retail	23,107 sq. ft.	Single and two level multi-tenant retail spaces.
	Recreation/Commercial Bldg.	120,000 sq. ft.	Two level adventure experiential commercial.
	Hotel	185,000 sq. ft.	Nine levels over the parking structure with 500 guest rooms.
	Gaspar Food Pad	3,140 sq. ft.	Single level restaurant.
	Entertainment Complex	150,000 sq. ft.	Three level theater building & supporting restaurant uses.
	Parking Structure	700 parking spaces	Parking structure with four levels below the hotel.
Area 3	Pad 1 Fast Food Restaurant	2,000 sq. ft.	Fast food restaurant with drive through lane.
	Pad 2 Fast Food Restaurant	4,400 sq. ft.	Fast food restaurant with drive through lane.
	Pad 3 Restaurant	5,000 sq. ft.	Sit down restaurant.
	Pad 4 Fast Food Restaurant	2,000 sq. ft.	Fast food restaurant with drive through lane.
	Pad 5 Restaurant or Office ¹	70,000 sq. ft.	<u>Four level office may be a public/institutional use.</u>
	Warehouse/Industrial	55,000 sq. ft.	Industrial building with seven loading docks.

Notes:

1. Pad 5 may be developed as a 4,500 square foot fast food restaurant use with a drive through lane instead of the office building.
Source: Studio Progetti. *A Project of Craig Realty Group. [The] Citadel.* November 21, 2018

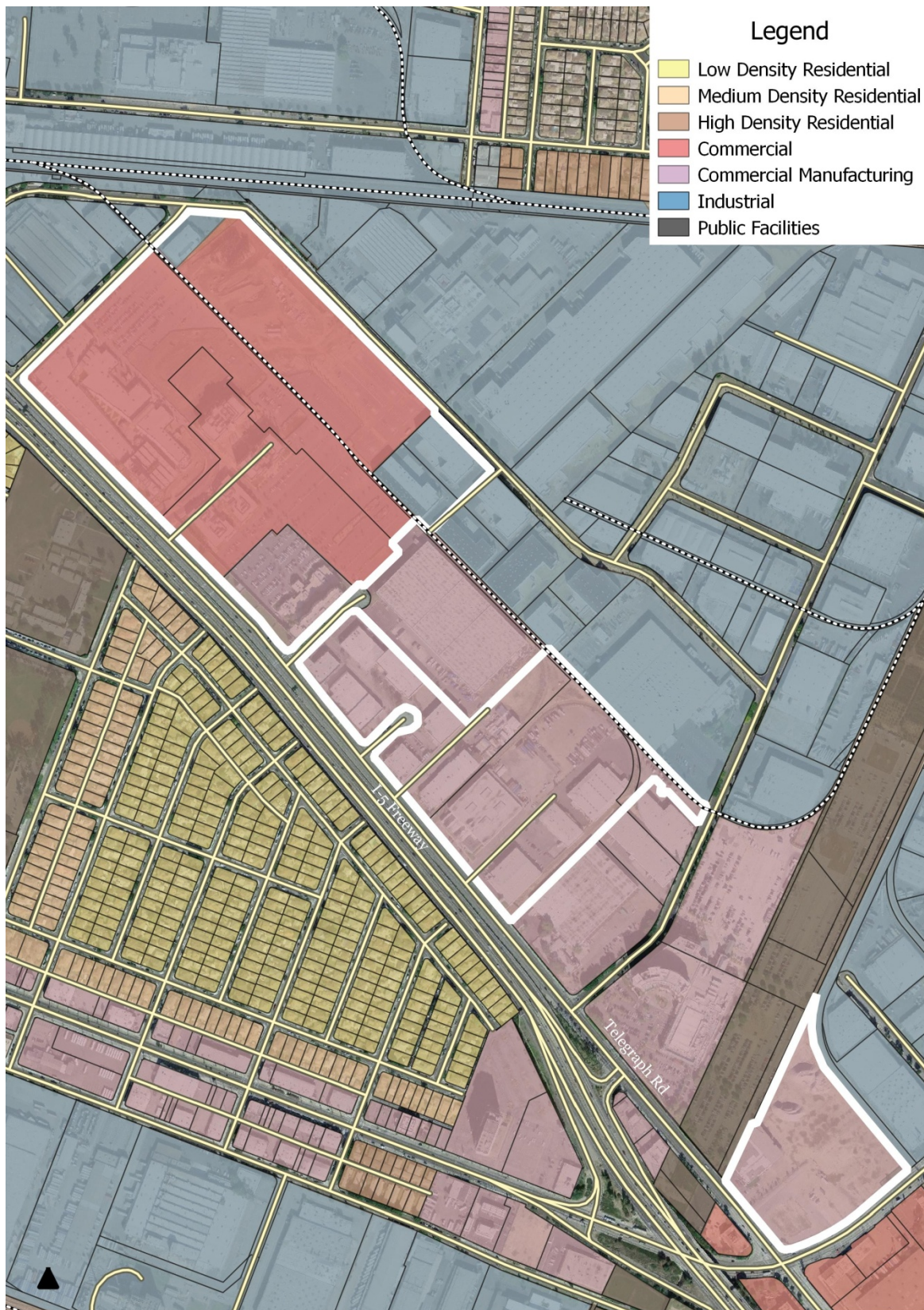


EXHIBIT 3-3
GENERAL PLAN MAP
Source: City of Commerce

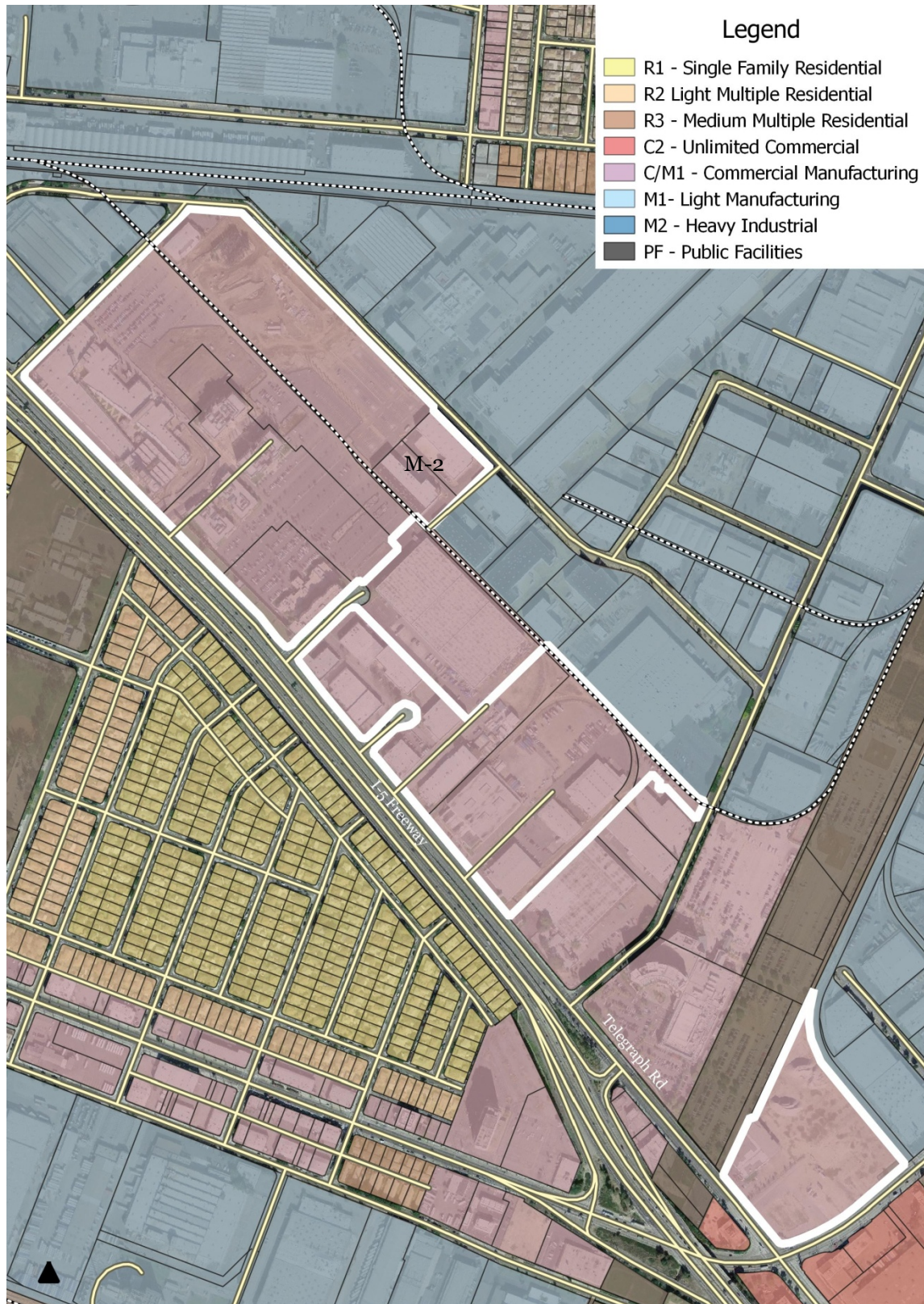


EXHIBIT 3-4
ZONING MAP
Source: City of Commerce

The area noted as M-2 was incorrectly identified in the Draft EIR as C/M1. M-2 is the correct zoning.

The proposed *new* development within the three areas (Area 1, Area 2, and Area 3) will have a total floor area of 1,007,202 square feet. The new development will consist of approximately 237,662 square feet of retail uses; 358,000 square feet of hotel uses totaling 770 rooms; 270,000 square feet of theater, entertainment, and recreation uses; 16,540 square feet of food serving uses; 70,000 square feet of office uses; and 55,000 square feet of industrial uses. This breakdown in land uses assumes that Pad 5 in Area 3 will be developed as an office use instead of a fast food restaurant.

The new development overall is classified as an infill development, which means that the project will be constructed within urban sites that were formerly developed. This recycling of obsolete sites and uses is crucial in reducing greenhouse gas emissions by preventing urban sprawl into the eastern (desert) portions of Southern California. SCAG has been actively promoting infill development through the adoption of the last two RTP/SCS'. The project is in line with SCAG's goal of promoting urban infill development.

The project would also be consistent with SCAG's growth management (RCP) goals that encourage development that will promote job growth and positive economic impact. The proposed project will introduce new jobs to an area with high unemployment rates and would provide the City with a new source of sales tax revenue. SCAG also encourages projects that are pedestrian/public transportation friendly and do not add to the congestion of city roads. The proposed project aims to provide a safe and accessible environment to both pedestrians and vehicles through the proposed circulation system as well as the creation of pedestrian pathways and rest areas within the project site.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

Approval of the proposed project would result in the proposed project being consistent with local land use plans, policies, and regulations.

MITIGATION OF POTENTIAL IMPACTS

No mitigation measures are required and the proposed project's impacts would be less than significant.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

3.8 NOISE IMPACTS

The section of the EIR is concerned with the proposed projects potential noise impacts. The analysis focuses on short-term construction noise impacts and long-term operational noise impacts.

3.8.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The preliminary environmental analysis undertaken as part of the Initial Study's preparation indicated the EIR should evaluate the following issues:

- The proposed project's potential for exposing persons to or the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- The proposed project's potential for the exposure of people to or generation of excessive ground-borne noise levels;
- The proposed project's potential for the substantial permanent increase in ambient noise levels in the project vicinity above noise levels existing without the project; and,
- The proposed project's potential for the substantial temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project.

3.8.2 ENVIRONMENTAL SETTING

Characteristics of Noise

Sound is mechanical energy transmitted by pressure waves through the air and is characterized by various parameters that include sound frequency, the speed of propagation, and the pressure level or energy content (amplitude). Noise is most often defined as unwanted sound. The decibel (dB) scale, a logarithmic loudness scale, is most often used to quantify sound intensity in a convenient and manageable manner. Since the human ear is not equally sensitive to all frequencies within the entire noise spectrum, noise measurements are weighted more heavily within those frequencies of maximum human sensitivity using an *A-weighting* written as dBA. The human ear can detect changes in sound levels greater than 3 dBA under normal ambient conditions. Changes of less than 1 to 3 dBA are noticeable to some people under quiet conditions while changes of less than 3 dBA are only discernable by few people under controlled, extremely quiet conditions. Typical noise levels associated with various activities are noted in Exhibit 3-5.

Noise may be generated from a point source, such as a piece of construction equipment, or from a line source, such as a road containing moving vehicles. This phenomenon is known as "spreading loss." Due to spreading loss, noise attenuates (decreases) with distance. Objects that block the line-of-sight attenuate the noise source if the receptor is located within the shadow of the blockage (such as behind a sound wall).

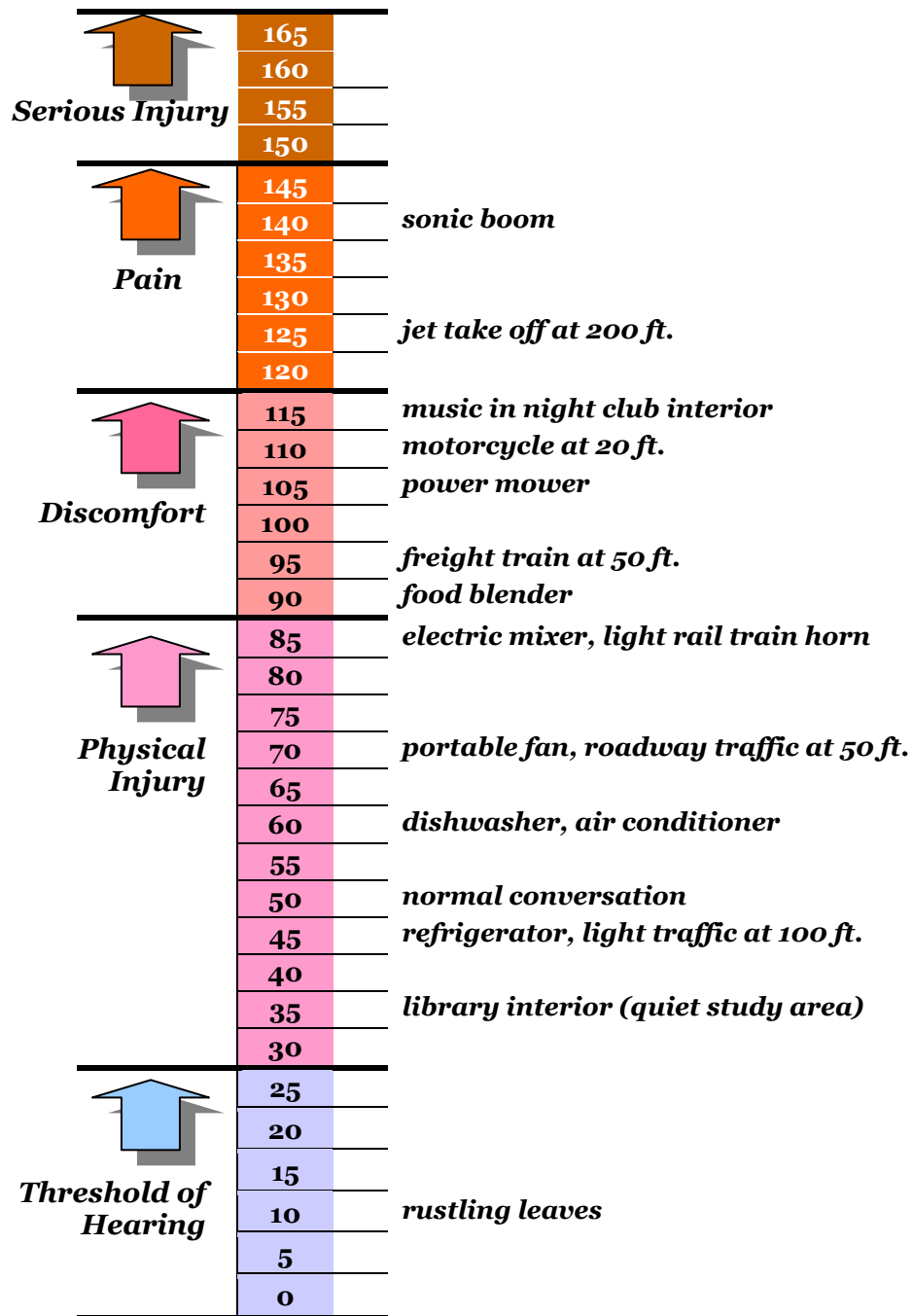


EXHIBIT 3-5
TYPICAL NOISE LEVELS FROM COMMON ACTIVITIES
 Source: Blodgett Baylosis Environmental Planning

Time variation in noise exposure is typically expressed in terms of the average energy over time (called Leq), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50% of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. Other values that are typically noted during a noise survey include the L_{min} and L_{max} that represent the minimum and maximum noise levels obtained over a given period.

Certain receptors are more sensitive to unwanted noise during the evening and at night. As a result, an artificial dB increment is added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or the day/night average noise level (Ldn). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 PM to 10:00 PM and 10 dBA for the hours from 10:00 PM to 7:00 AM to take into account a person's increased sensitivity to noise during these periods. The Ldn descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 PM and 10:00 PM. Both descriptors give roughly the same 24-hour level with the CNEL being only slightly more restrictive (i.e., higher).

Regulatory Setting - Federal Noise Control Regulations

The *Noise Control Act of 1972* authorized the Environmental Protection Agency (EPA) to publish descriptive data on the effects of noise and establish levels of sound requisite to protect public welfare with an adequate margin of safety. The Federal Office of Noise Abatement and Control (ONAC) was originally the responsible with implementing the Noise Control Act. However, the ONAC has since been eliminated, leaving the development of federal noise policies and programs to other federal agencies and interagency committees.

For example, the Occupational Safety and Health Administration (OSHA) agency limits noise exposure of workers to 90 dB Leq or less for eight continuous hours or 105 dB Leq or less for one continuous hour. The Department of Transportation (DOT) assumed a significant role in noise control through its various operating agencies. The Federal Aviation Administration (FAA) regulates noise of aircraft and airports. Surface transportation system noise is regulated by a host of agencies, including the Federal Transit Administration (FTA). Transit noise is regulated by the federal Urban Mass Transit Administration (UMTA), while freeways that are part of the interstate highway system are regulated by the Federal Highway Administration (FHWA). Finally, the federal government actively advocates that local jurisdictions use their land use regulatory authority to arrange new development in such a way that "noise sensitive" uses are either prohibited from being sited adjacent to a highway or, alternately that the developments are planned and constructed in such a manner that potential noise impacts are minimized.

Regulatory Setting – State Noise Control Regulations

The *California Motor Vehicle Code* establishes noise standards for those areas not regulated by the Federal government. State standards regulate the noise levels of motor vehicles and motorboats; establish noise impact boundaries around airports; regulate freeway noise affecting classrooms, sound transmission control and occupational noise control; and identify noise insulation standards.

The *California Administrative Code, Title 24, Building Standards, Chapter 2.35*, outlines noise insulation performance standards to protect persons within new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings. The *California Occupational Noise Control Standards* contained in the California Code of Regulations, Title 8, Industrial Relations, Chapter 4, indicates permissible noise exposure at a workplace. According to these regulations, employees should not be exposed to noise levels of 90 dBA for more than eight hours in any workday.

Regulatory Setting – City of Commerce

The *City of Commerce 2020 General Plan* includes goals and policies designed to protect local residents from excessive noise. These policies underscore the city's continued efforts to control noise exposure through land use planning and building design.⁹⁸

- *Safety [Element] Policy 6.1.* The City of Commerce will ensure that residents are protected from harmful and irritating noise sources to the greatest extent possible.
- *Safety [Element] Policy 6.2.* The City of Commerce will work with businesses in the city and other public agencies to identify ways to reduce noise impacts throughout the city.
- *Safety [Element] Policy 6.3.* The City of Commerce will continue to enforce the existing city's noise control ordinance.
- *Safety [Element] Policy 6.4.* The City of Commerce will incorporate noise considerations into land use planning decisions.
- *Safety [Element] Policy 6.6.* The City of Commerce will encourage acoustical design in all new construction.
- *Safety [Element] Policy 6.7.* The City of Commerce will require additional landscaping in industrial and commercial projects to help reduce noise impacts through increased setbacks.
- *Safety [Element] Policy 6.8.* The City of Commerce will evaluate and implement measures to control stationary non-transportation noise impacts.
- *Safety [Element] Policy 6.9.* The City of Commerce will continue to use the Sheriff's Department or expand the responsibility of the city's Code Enforcement Division to monitor and respond to noise complaints.
- *Safety [Element] Policy 6.10.* The City of Commerce will establish and maintain coordination among the city agencies involved in noise abatement.

⁹⁸ Commerce, City of. *City of Commerce 2020 General Plan, Section 7 Safety Element*. January 2008

- *Safety [Element] Policy 7.3.* The City of Commerce will provide for measures to reduce noise impacts from transportation-related noise sources.
- *Safety [Element] Policy 7.8.* The City of Commerce will mitigate noise impacts related to truck loading and unloading (including garbage trucks) by requiring trash pick-up to be changed to daytime periods.

The *City of Commerce Municipal Code Title 19 – Zoning, Chapter 19.19 – Site Planning and General Development Standards, Section 19.19.160 – Noise*. This section describes the noise standards that are applicable to the various types of zoning. According to this section in the Commerce Municipal Code, the maximum permitted noise levels for residentially zoned properties are 55 dBA from 7:00 AM to 7:00 PM; 50 dBA from 7:00 PM to 10:00 PM; and 45 dBA from 10:00 PM to 7:00 AM. The maximum permitted noise levels for commercial zoned properties are 65 dBA from 7:00 AM to 10:00 PM and 55 dBA from 10:00 PM to 7:00 AM.

The *City of Commerce General Plan Noise Exposure and Land Use Compatibility Guidelines* for land uses in the City that reflect the former California Office of Noise Control prepared Guidelines for the Preparation and Content of Noise Elements of General Plans. These guidelines indicated the compatibility of noise-sensitive land uses in areas subject to noise levels of 55 to 80 dB CNEL or Ldn. Residential uses are normally unacceptable in areas exceeding 70 dB CNEL; and conditionally acceptable between 55-70 dB CNEL for low-density single-family dwelling units, duplexes, and mobile homes, and between 60-70 dB CNEL for multiple-family units. Schools, libraries, hospitals, and nursing homes are treated as noise-sensitive land uses, requiring acoustical studies within areas exceeding 60 dB CNEL. Commercial/professional office buildings and industrial land uses are normally unacceptable in areas exceeding 75 dB CNEL, and are conditionally acceptable within 67 to 78 dB CNEL (for commercial/professional offices only).

Existing Ambient Noise Environment

The existing noise environment in the area is dominated by motor vehicle traffic traveling on local roads and the I-5 freeway. To characterize existing noise levels in the project area, noise emitted by peak-hour traffic traveling on streets in the City of Commerce was modeled using the Federal Highway Administration Traffic Noise Prediction Model⁴ and traffic volume data provided in the Citadel Expansion Traffic Impact Analysis.

To determine the existing noise levels along major roadways and transportation facilities, existing traffic volumes were modeled using the California Department of Transportation (CALTRANS) Traffic Noise Prediction Model. The model calculated the noise level for a particular reference set of conditions (such as existing traffic volumes, roadway grade, vehicle speeds, number of travel lanes, etc). Noise levels (in CNEL) were expressed using noise contours representing a line along which the ambient traffic noise levels were equal (the use of noise contours in this fashion are similar to how weather maps depict common temperatures or topographic maps show areas of equal elevation). For purposes of this analysis, noise level contours for the 70 CNEL, 65, CNEL, and 60 CNEL were calculated.

The noise model computed the distance of the specific noise contour from the roadway centerline. For example, in Table 3-12 the 65 CNEL contour for the Telegraph Road corridor was found to be 110 feet on both sides of the roadway. This figure indicated that all of the properties and land between the contour line and the roadway centerline would be exposed to noise levels of at least 65 CNEL. However, the actual distances to these contours could be considerably less than predicted where intervening structures break the line-of-sight to the roadway.

Table 3-12
Existing Roadway Noise Levels

Roadway	Average Daily Traffic	Distance From Roadway Centerline to CNEL (in feet)*			dBA @ 50' from Centerline
		70 dBA/Ldn	65 dBA/Ldn	60 dBA/Ldn	
Telegraph Rd.	30,556	918 feet	1,902 feet	3,280 feet	87 dBA
Washington Blvd.	8,839	557 feet	1,115 feet	2,230 feet	84 dBA

* Does not consider any obstructions to the noise path. Assumes 10% Trucks
Source: Blodgett Baylosis Environmental Planning 2019

Exterior noise impacts on the building interiors will be reduced by complying with the California Green Building code, which requires the use energy efficient windows and insulation. Insulation will be placed between the joists and studs and will serve as an additional buffer which when combined with stucco and drywall, will reduce interior noise levels by a minimum of 10.0 dBA.⁹⁹ Noise reductions of up to 20 dBA are possible with closed windows.¹⁰⁰ According to the California Department of Transportation, half-inch thick wood attenuates noise by up to 18 dBA.¹⁰¹ Assuming a reduction of 10.0 dBA, interior noise levels are anticipated to average 48.6 dBA due to the building's shell. In addition, the inclusion of central air conditioning will further reduce interior noise.

The project area is located within an urbanized setting and the ambient noise characteristics reflect the surrounding urban environment. The predominant source of noise in the area is related to traffic on the I-5 freeway. An Extech Digital Sound Meter was used to conduct the noise measurements. The meter was performed using a slow response setting, with an "A" weighting. The meter's height above the ground surface was five feet. A series of 100 discrete noise measurements were recorded along the north side of Telegraph Road. The duration of each measurement period was 15 minutes.

⁹⁹ California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol – Table 7-1 FHWA Building Noise Reduction Factors*. Report dated 2013.

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

The results of the survey are summarized in Table 3-13. The measurements were taken on a Wednesday morning at 11:00 AM. The noise measurement location approximately 15 feet from the north curb of along the Area 2 frontage. The median ambient exterior noise level (L_{50}) was 72.1 dBA at the measurement location. The L_{50} represents the noise level that is exceeded 50% of the time (half the time the noise level exceeds this level and half the time the noise level is less than this level). As shown in Table 3-13, the average ambient noise level was 72.0 dBA. The high levels of ambient noise were due to the freeway traffic on the I-5 Freeway. In addition, the traffic on Telegraph Road was a secondary source of noise.

Table 3-13
Noise Measurement Results

Noise Metric	Noise Level (dBA)
L_{max} (Maximum Noise Level)	80.0 dBA
L_{99} (Noise levels <99% of time)	79.3 dBA
L_{90} (Noise levels <90% of time)	75.9 dBA
L_{75} (Noise levels <75% of time)	73.9 dBA
L_{50} (Noise levels <50% of time)	72.1 dBA
L_{min} (Minimum Noise Level)	67.3 dBA
Average Noise Level	72.0 dBA

Source: Blodgett Baylosis Environmental Planning.

3.8.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project may be deemed to have a significant impact on the environment if it results in any of the following:

- The proposed project's potential for exposing persons to or the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- The proposed project's potential for exposing people to, or generation of, excessive ground-borne noise levels;
- The proposed project's potential for a substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project;
- The proposed project's potential for a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and,
- The proposed project's potential for locating of a project within two miles of a public airport or public use airport where the project may expose people residing or working in the project area to excessive noise levels.

3.8.4 ENVIRONMENTAL IMPACTS

3.8.4.1 THE EXPOSURE OF PERSONS TO OR THE GENERATION OF NOISE LEVELS IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES.

DISCUSSION OF IMPACT ANALYSIS

The operation/occupation of the proposed project will not expose existing sensitive receptors to excessive noise levels. The nearest noise sensitive receptors are located approximately 250 feet to the south along the south side of the I-5 freeway. According to Table 3-14, the proposed project's operation will not affect the aforementioned sensitive receptors because noise levels naturally decline as the distance increases. This is due in large measure to the relatively high ambient noise levels.

**Table 3-14
Future Roadway Noise Levels**

Roadway	Average Daily Traffic	Distance From Roadway Centerline to CNEL (in feet)*			dBA @ 50' from Centerline
		70 dBA/Ldn	65 dBA/Ldn	60 dBA/Ldn	
Telegraph Rd.	31,995	1,246 feet	2,362 feet	4,068 feet	89.0 dBA
Washington Blvd.	9,449	557 feet	1,148 feet	2,378 feet	84.0 dBA

* Does not consider any obstructions to the noise path. Assumes 10% Trucks
Source: Blodgett Baylosis Environmental Planning 2019

The line-of-sight between the aforementioned neighborhood and the Planning Area are presently obstructed by the sound walls installed along the south side of I-5 freeway. Furthermore, the high ambient noise levels generated by the surrounding traffic travelling on the I-5 as well as on the adjacent roadways will mask any noise emanating from the project area. In addition, the high ambient noise levels generated by the surrounding traffic travelling on the I-5 as well as on the adjacent roadways will mask any noise emanating from the project area.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project's implementation will not affect the sensitive receptors located 250 feet to the south along the south side of the I-5 freeway.

MITIGATION OF POTENTIAL IMPACTS

The proposed project's implementation will be less than significant and, as a result, no mitigation is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential for exposing persons to or the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

3.8.4.2 THE EXPOSURE OF PEOPLE TO, OR GENERATION OF, EXCESSIVE GROUND-BORNE NOISE LEVELS.

DISCUSSION OF IMPACT ANALYSIS

Future noise levels related to construction within and adjacent to the project site would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment. Construction activities could involve excavation, grading, demolition, drilling, trenching, earth movement, vehicle travel to and from the project site, and possibly pile driving. Construction-related material haul trips would raise ambient noise levels along haul routes depending on the number of haul trips made and types of vehicles used.

Exhibit 3-6 indicates the typical noise levels produced by various types of construction equipment. Construction of the project could generate significant amounts of noise, corresponding to the particular phase of building construction and the noise generating equipment, including the driving of piles, used during construction. The existing noise environment in the area is dominated by motor vehicle traffic traveling on local roads and the I-5 Freeway. The nearest sensitive receptors are located to the south of the I-5 Freeway. The outside pedestrian and parking areas would also be impacted by construction noise. The interior areas are insulated for climate control which would also effectively attenuate construction noise. Construction activities associated with the project would be temporary in nature and related noise impacts would be short term. Also, since construction activities would not substantially increase ambient noise levels at noise-sensitive locations, construction noise would not result in significant impacts to sensitive receptors.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

Construction activities associated with the project would be temporary in nature and related noise impacts would be short term. Also, since construction activities would not substantially increase ambient noise levels at noise-sensitive locations, construction noise would not result in significant impacts to sensitive receptors.

MITIGATION OF POTENTIAL IMPACTS

The analysis indicated the proposed project would not result in a potential for exposing people to, or generation of, excessive ground-borne noise levels. As a result, no mitigation is required.

				70	80	90	100
Equipment Powered by Internal Combustion Engines	Earth Moving Equipment	Compactors (Rollers)					
		Front Loaders					
		Backhoes					
		Tractors					
		Scrapers, Graders					
		Pavers					
		Trucks					
	Materials Handling Equipment	Concrete Mixers					
		Concrete Pumps					
		Cranes (Movable)					
		Cranes (Derrick)					
	Stationary Equipment	Pumps					
		Generators					
		Compressors					
Impact Equipment		Pneumatic Wrenches					
		Jack Hammers					
		Pile Drivers					
Other Equipment		Vibrators					
		Saws					

EXHIBIT 3-6
TYPICAL CONSTRUCTION NOISE LEVELS
Source: Blodgett Baylosis Environmental Planning

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential for exposing people to, or generation of, excessive ground-borne noise levels.

3.8.4.3 A PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROJECT ABOVE LEVELS EXISTING WITHOUT THE PROJECT.

DISCUSSION OF IMPACT ANALYSIS

The proposed project will generate additional vehicle traffic to the local roadway network. These additional vehicle trips will contribute to an increase in roadway noise in the project vicinity. In addition, the proposed project will generate noise from stationary sources such as roof mounted air-conditioning units and truck delivery activities. Using the Federal Highway Administration's Highway Traffic Noise Prediction Model, traffic noise levels were modeled for the five roadway segments where traffic volumes would potentially be great enough to result in a perceptible increase in noise levels. It should be noted that it typically requires a *doubling* of traffic volumes to result in an increase in the ambient noise levels of between 3.0 to 5.0 dBA. The 3.0 to 5.0 dBA figures are considered to be the limit where changes in the noise levels may be perceived by persons with normal hearing. The results of the modeling are shown in Table 3-15.

**Table 3-15
Existing & Future Roadway Noise Levels**

Condition	Roadway Segment	Noise Levels – 50 Feet From Roadway
Existing Condition	Telegraph Rd.	87 dBA
	Washington Blvd.	84 dBA
Future Condition (Post Project)	Telegraph Rd.	89 dBA
	Washington Blvd.	84 dBA
Net Change (Future-Existing)	Telegraph Rd.	2.0 dBA
	Washington Blvd.	No change

As shown, in Table 3-11, the noise levels for the study segments would not increase to a level that would be perceptible to persons with average hearing (3.0 to 5.0 dBA). According to Commerce General Plan Policy 7.8.1.1, which establishes maximum acceptable noise limits for different land uses, the acceptable noise limit in the vicinity of the project site is 70 dBA. The future projected traffic noise levels identified in Table 3-11 would not exceed 70 dBA along the roadways where significant project-generated noise increases would occur. Therefore, the project's traffic increases would result in less than significant impacts related to noise.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project will generate additional vehicle traffic to the local roadway network. These additional vehicle trips will contribute to an increase in roadway noise in the project vicinity. In addition, the proposed project will generate noise from stationary sources such as roof mounted air-conditioning

units and truck delivery activities. Using the Federal Highway Administration's Highway Traffic Noise Prediction Model, traffic noise levels were modeled for the five roadway segments where traffic volumes would potentially be great enough to result in a perceptible increase in noise levels. It should be noted that it typically requires a *doubling* of traffic volumes to result in an increase in the ambient noise levels of between 3.0 to 5.0 dBA. The 3.0 to 5.0 dBA figures are considered to be the limit where changes in the noise levels may be perceived by persons with normal hearing.

MITIGATION OF POTENTIAL IMPACTS

The analysis indicated the proposed project would not result in a potential significant impact. As a result, no mitigation is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a potential for a substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project.

3.8.4.4 A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT.

DISCUSSION OF IMPACT ANALYSIS

Future noise levels related to construction within and adjacent to the project site would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment. Construction activities could involve excavation, grading, demolition, drilling, trenching, earth movement, vehicle travel to and from the project site, and possibly pile driving. Construction-related material haul trips would raise ambient noise levels along haul routes depending on the number of haul trips made and types of vehicles used. Exhibit 3-6 indicates the typical noise levels produced by various types of construction equipment.

The existing noise environment in the area is dominated by motor vehicle traffic traveling on local roads and the I-5 Freeway. The nearest sensitive receptors are located to the south of the I-5 Freeway. The outside pedestrian and parking areas would also be impacted by construction noise. The interior areas are insulated for climate control which would also effectively attenuate construction noise. Construction activities associated with the project would be temporary in nature and related noise impacts would be short term. Also, since construction activities would not substantially increase ambient noise levels at noise-sensitive locations, construction noise would not result in significant impacts to sensitive receptors.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

Construction activities associated with the project would be temporary in nature and related noise impacts would be short term. Also, since construction activities would not substantially increase ambient noise levels at noise-sensitive locations, construction noise would not result in significant impacts to sensitive receptors.

MITIGATION OF POTENTIAL IMPACTS

The analysis indicated the proposed project would not result in a potential significant impact. As a result, no mitigation is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

3.9 POPULATION & HOUSING IMPACTS

This section discusses the potential impacts to public services, including the proposed project's effect generating potential population growth, either directly or indirectly.

3.9.1 SCOPE OF ANALYSIS

The City determined that the analysis should focus on the following issue areas:

- The proposed project's potential for resulting in substantial population growth in an area, either directly or indirectly.

3.9.2 ENVIRONMENTAL SETTING

Regulatory Setting

Population and housing issues are addressed by various State and Local agencies. In addition, there are a number of existing regulations that are applicable to any new development that will be effective in further reducing potential impacts related to population and housing.

- *SCAG 2016 Growth Forecast Appendix.* The Regional Growth Forecast is used as a key guide for developing regional plans and strategies mandated by federal and state governments such as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Program Environmental Impact Report (PEIR) for the RTP/SCS, the Air Quality Management Plan (AQMP), the Federal Transportation Improvement Program (FTIP) and the Regional Housing Needs Assessment (RHNA). The Growth Forecast Appendix to 2016-2040 RTP/SCS is intended to provide more details on the development of the regional growth forecasts for 2016-2040 RTP/SCS. The growth forecast appendix provides employment, household, and population projections for every City located within the SCAG, including the City of Commerce.
- *City of Commerce 2020 General Plan/Housing Element.* The General Plan serves as the blueprint for future growth and development in Commerce. The plan contains policies and programs designed to provide decision makers with a basis for decisions related to land use and development. The adopted Commerce General Plan also includes the City's Housing Element. The City of Commerce first initiated a comprehensive general plan update, including an update of the Housing Element, in the mid-1980. This earlier element was subsequently updated in the mid-1990's pursuant to the required updates by the California Department of Housing and Community Development (HCD). This current Housing Element builds upon the previous elements by updating technical information and assessing the city's progress in implementing its earlier housing goals, objectives, and programs. In addition, this Element outlines those strategies and programs that will enable the city to meet its current Regional Housing Needs Assessment (RHNA). Finally, this Housing Element serves as a critical link between housing policy and the long-range land use plan that calls for continued infill housing development as well as new

opportunities for housing in areas that were previously developed in commercial or industrial uses.

- *California Department of Housing and Community Development (HCD).* HCD plays a critical role in the housing-planning process, which was designed to ensure that communities plan housing that meet the needs of everyone in California's communities. HCD also develops policies that support housing and community development, and conducts research and analysis of California's housing markets and needs. HCD produces California's Statewide Housing Plan (required by state law), California's "Consolidated Plan" (required for California to receive millions of federal dollars for housing and community development), and other special reports.

Existing Employment, Population, and Housing

Virtually all of the land area within Commerce's corporate boundaries was developed prior to the city's incorporation in 1960. Over the years, the lack of available land has presented unique challenges to the city in its efforts to provide housing for its growing population. Innovative redevelopment projects and housing rehabilitation programs have led to significant improvements in both the quantity and quality of available housing. However, the average household size continues to grow, placing increased pressure on the existing housing stock. According to the California State Department of Finance as of January 1, 2019, the City's population was 13,201 persons and the number of housing units was 3,473 units. There are no housing units or persons residing within the three project areas.

3.9.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project will normally be deemed to have a significant adverse impact, if it results in any of the following:

- The proposed project's potential for resulting in a substantial population growth in an area, either directly or indirectly.

3.9.4 ENVIRONMENTAL IMPACTS

3.9.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A SUBSTANTIAL INCREASE IN POPULATION.

DISCUSSION OF IMPACT ANALYSIS

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. The variables that typically contribute to growth-inducing impacts, and the project's potential growth-inducing impacts, are identified in Table 3-15 provided below and on the following page. As indicated in Table 3-16, the proposed project would not result in any growth inducing impacts. As a result, no impacts are anticipated.

Table 3-16
Potential Growth-Inducing Impacts

Factor Contributing to Growth Inducement	Project's Potential Contribution	Basis for Determination
New development in an area presently undeveloped and economic factors which may influence development.	The proposed project would promote development of underutilized parcels.	The new development would promote development consistent with the General Plan Policies for infill development.
Extension of roadways and other transportation facilities.	The proposed project may include an option to extend Gaspar Avenue northbound to Smithway Street.	Limited off-site improvements that will be required will serve the Planning Area only.
Extension of infrastructure and other improvements.	No other off-site water, sewer, and other critical infrastructure improvements are anticipated.	The only infrastructure improvements would be designed to serve the proposed project only.
Major off-site public projects (treatment plants, etc).	No major facilities are proposed at this time.	No off-site facilities would be required to accommodate the projected demand for wastewater treatment or water.
The housing requiring replacement housing elsewhere.	The project does not involve the removal or the replacement of existing affordable or subsidized housing units.	No subsidized affordable housing would be affected by the proposed project.
Additional population growth leading to increased demand for goods and services.	The proposed project would result in long-term growth in employment.	The proposed project will result in a potential build-out of 1,750 new jobs.
Short-term growth inducing impacts related to the project's construction.	The proposed project may result in the creation of new construction employment.	Short-term increases in construction employment are considered a beneficial impact.

Source: Blodgett Baylosis Environmental Planning. 2018.

The proposed project will also conform to Consistency Criteria 2 since it will not significantly affect any regional population, housing, and employment projections prepared for the City of Commerce. Projects that are consistent with the projections of employment and population forecasts identified in the Regional Comprehensive Plan (RCP) prepared by the Southern California Association of Governments (SCAG) are considered consistent with the AQMP growth projections, since the RCP forms the basis of the land use and transportation control portions of the AQMP.

According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan (RTP), the City of Commerce is projected to add a total of 4,500 jobs through the year 2040.¹⁰² A total of 1,750 new jobs will be created by the proposed project, assuming employment generation rates derived from the Institute of Transportation Engineers. The number of jobs that will be created is well within SCAG's employment projections for the City. In addition, the project may aid in reducing citywide unemployment. Finally, the proposed project is consistent with the land use policy outlined in the City of Commerce General Plan.

¹⁰² Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040*. Adopted on April 7, 2016. <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

The current unemployment rate for the City of Commerce is 5.8% which translates into 300 local residents actively seeking work. The corresponding figures for surrounding communities including Bell (600 unemployed persons or an unemployment rate of 4.2%); Bell Gardens (700 unemployed persons or an unemployment rate of 4.8%); Maywood (500 unemployed persons or an unemployment rate of 3.7%); East Los Angeles (3,800 unemployed persons or an unemployment rate of 6.6%); and Montebello (1,200 unemployed persons or an unemployment rate of 4.2%). Within these five adjacent communities, there is a total of 6,800 persons actively seeking work.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The number of new jobs that will be created by the proposed project has been accounted for by SCAG for the 2016 RTP.

MITIGATION OF POTENTIAL IMPACTS

No mitigation is required per the analysis.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in a substantial growth in the population within an area, either directly or indirectly related to a project.

3.10 PUBLIC SERVICES IMPACTS

3.10.1 SCOPE OF ANALYSIS

This section discusses the potential impacts to public services, including the proposed project's effect on existing fire protection and police protection within the City of Commerce and the vicinity of the project site. The City determined that the analysis should focus on the following issue areas:

- The proposed project's potential for resulting in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause a significant environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives relative to fire protection services.
- The proposed project's potential for resulting in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause a significant environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives relative to police protection services.

3.10.2 ENVIRONMENTAL SETTING

Regulatory Setting – Local Regulations

There are a number of existing regulations applicable to any new development that will be effective in further reducing potential public service impacts. These regulations that will serve as standard conditions with respect to public services are identified below:

The City of Commerce General Plan contains goals, objectives, and policies that are intended to guide land use and development decisions in the future. The following policies are applicable to the issues raised in this section:

- *Safety [Element] Policy 1.1.* The City of Commerce will strive to respond to all in-city emergency incidents within a five-minute or less response time.
- *Safety [Element] Policy 1.2.* The City of Commerce will continue to support the efforts of the fire department in the prevention and suppression of fires.
- *Safety [Element] Policy 1.6.* The City of Commerce will ensure that the Fire Department will be included in the environmental review of any large development to ensure that fire prevention and suppression features have been considered in the overall design.
- *Safety [Element] Policy 2.1.* The City of Commerce will ensure that law enforcement services continue to meet the public safety needs of the community.

The *City of Commerce Municipal Code*, Chapter 3.20 of the City of Commerce Municipal Code covers Fire Service fees. The city council declares that a fire protection service fee shall be established and assessed upon all owners of real property within the city for the purpose of producing revenue to maintain sufficient fire service levels.

The *Los Angeles County Fire Code (Title 32, Los Angeles County Fire Code. 2014 Edition)* is adopted in its entirety by reference, as the fire prevention code of the City of Commerce and fully expresses the city council's will and intention to enforce the provisions of Title 32 of the Los Angeles County Fire Code (2014 Edition) within the City.

Environmental Services - Fire Department Services

Fire prevention services are provided by the Los Angeles County Fire Department (LACFD). The services offered by the LACFD include firefighting, paramedic and first aid treatment, hazardous material response, and emergency preparedness coordination. The LACFD is organized into nine divisions overseeing 22 battalions and the City of Commerce is served by Battalion 3. The LACFD is staffed by 4,713 sworn and non-sworn personnel. Of this figure, 2,904 are sworn firefighters or paramedics, with the remaining 1,809 personnel consisting of non-sworn staff. There are three LACFD stations located within the City:

- *Station 22* (928 South Gerhart Street). This station includes a single engine company.
- *Station 27* (6031 Rickenbacker Road). This station includes an engine company and a quint unit (a “quint” unit is a fire apparatus truck that has a dual purpose of a ladder truck and an engine).
- *Station 50* (2327 South Saybrook Avenue). Station 50 is the first response station to the project site is Station 50, located 0.31 miles to the north of the Planning Area. This station includes an engine company and a rescue squad.

The average emergency response time for calls for service in the City averages around just over five minutes (City of Commerce General Plan has adopted a response time objective of five minutes or less for all in-city emergency incidents). Ambulance transport is provided by Care Ambulance Service.

ENVIRONMENTAL SETTING – LAW ENFORCEMENT SERVICES

The City also utilizes the services of the Los Angeles County Sheriff's Department. The City has maintained this contract since incorporation. The nearest first response station to the project site is the Los Angeles County Sheriff's Station located 2.06 miles to the northwest at 5019 East 3rd Street within the City of Los Angeles. The Citadel Outlets Security Department maintains patrols throughout the complex during business hours and after hours. Other responsibilities include public safety and traffic control. The hotels located within the existing Citadel outlets also maintain their own in-house security. Finally, the Citadel currently pays for the cost of one full-time LACSD position to patrol the site.

3.10.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project will normally be deemed to have a significant adverse impact, if it results in any of the following:

- The proposed project's potential for resulting in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause a significant environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives relative to fire protection services.
- The proposed project's potential for resulting in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause a significant environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives relative to police protection services.

3.10.4 ENVIRONMENTAL IMPACTS

3.10.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A SUBSTANTIAL ADVERSE PHYSICAL IMPACT ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH WOULD CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR OTHER PERFORMANCE OBJECTIVES RELATIVE TO FIRE PROTECTION SERVICES.

DISCUSSION OF IMPACT ANALYSIS

The LACFD review the development plan and indicated that the proposed project is located in an area with adequate fire protection coverage and stated that the project would be expected to generate a negligible increase in the number of calls for service. The LACFD also indicated that the proposed development would be required to comply with the standard requirements of the California Fire Code, including provisions pertaining to vehicular access, minimum fire flow standards, fire hydrant spacing, fire sprinkler systems, and related items. Compliance with these standard Fire Code requirements would be determined at the plan check submittal, which is in accordance with the City's standard practice.

The proposed project would involve the development of commercial structures of 30 feet or more in height. In accordance with the California Fire Code, a minimum of two points of vehicular access must be provided. As shown on the site plans provided herein in Section 2, the future development would provide numerous vehicular access points in conformance with LACFD requirements. In summary, the proposed project would not create a need for new or expanded fire protection facilities that result in physical impacts on the environment. Impacts would be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project would not create a need for new or expanded fire protection facilities that result in physical impacts on the environment. As a result, the impacts would be less than significant.

MITIGATION OF POTENTIAL IMPACTS

The analysis determined that no significant adverse impacts would result from the proposed project's implementation. As a result, no mitigation is required.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant impacts related to the provision of fire department services.

3.10.4.2 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A SUBSTANTIAL ADVERSE PHYSICAL IMPACT ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH WOULD CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR OTHER PERFORMANCE OBJECTIVES RELATIVE TO POLICE PROTECTION SERVICES.

DISCUSSION OF IMPACT ANALYSIS

The LACSD provided comments to the City of Commerce indicating that the proposed project would be expected to result in a nominal increase in time handling petty theft (shoplifting) incidents and recommended that the operators expand the existing on-site number of loss prevention personnel. As a conditional of approval, the operators would provide security measures including loss prevention personnel and video surveillance to deter or prevent criminal activity (such as petty theft), consistent with the LACSD. In summary, the proposed project would not create a need for new or expanded police protection facilities that result in physical impacts on the environment. As a result, the potential impacts with the expanded Citadel security personnel and the other security-related improvements would be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The proposed project would not create a need for new or expanded law enforcement services or facilities that result in physical impacts on the environment. As a result, the potential impacts would be less than significant.

MITIGATION OF POTENTIAL IMPACTS

The proposed project would not create a need for new or expanded law enforcement facilities or services that result in physical impacts on the environment. As a result, the potential impacts would be less than significant.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant impacts related to the provision of law enforcement services.

3.11 TRANSPORTATION & CIRCULATION IMPACTS

This section of the EIR analyzed the proposed project's potential traffic impacts and identified any attendant mitigation measures.

3.11.1 SCOPE OF ANALYSIS

The City of Commerce, in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The preliminary environmental analysis undertaken as part of the Initial Study's preparation indicated the EIR should evaluate the following traffic and circulation issues:

- The proposed project's potential for resulting in a conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- The proposed project's potential for exceeding, conflicting with an applicable congestions management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by a county congestion management agency for designated roads or highways;
- The proposed project's potential for resulting in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks;
- The proposed project's potential for substantially increasing hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and,
- The proposed project's potential for conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

3.11.2 ENVIRONMENTAL SETTING

Traffic impacts were evaluated on a typical weekday during the morning (7:00 AM to 9:00 AM) and afternoon (4:00 PM to 6:00 PM) peak periods and on a typical Saturday during the midday peak hour (12:00 PM to 2:00 PM). The base assumptions, technical methodologies, and study area were identified as part of the jointly developed study approach. The following traffic scenarios were developed and analyzed as part of this study (refer to Appendix Volume 2, which is provided under a separate cover):

- *Existing Conditions (Year 2018).* The analysis of existing traffic conditions is intended to provide a basis for the remainder of the study. The Existing Conditions analysis includes an assessment of streets, traffic volumes, and operating conditions.

- *Existing with Project Conditions (Year 2018).* The California Environmental Quality Act (CEQA) requires an evaluation of Project traffic impacts on the existing environment as part of traffic impact analyses. This analysis evaluates the potential Project-related traffic impacts as compared to existing conditions.
- *Future without Project Conditions (Year 2025).* Future traffic conditions were projected for Year 2025 without the Project. The objective of this analysis is to forecast the future traffic growth and intersection operating conditions expected to result from general regional growth and specific related projects developed in the vicinity of the Project site by the Year 2025. This scenario is used as the baseline against which potential Project traffic impacts are evaluated.
- *Future with Project Conditions (Year 2025).* This analysis measures future traffic conditions with traffic expected to be generated by the Project added to Year 2025 without the Project traffic conditions. The incremental impacts of the Project on future traffic operating conditions were then identified.
- *Future with Truck Traffic without Project Conditions (Year 2025).* Future traffic conditions were projected for Year 2025 without the Project. The objective of this analysis is to forecast the future traffic growth and intersection operating conditions expected to result from general regional growth and specific related projects developed in the vicinity of the Project site by the Year 2025. This scenario is used as the baseline against which potential Project traffic impacts are evaluated. To provide a conservative analysis, this scenario assumes that the major streets and intersections in the Study Area will accommodate between five to ten percent truck traffic while the minor streets and minor turning movements will accommodate between two to five percent trucks on both weekdays and weekends. These truck trips were factored up to reflect Passenger Car Equivalents (PCE) using the street system.
- *Future with Truck Traffic with Project Conditions (Year 2025).* This analysis measures future traffic conditions with traffic expected to be generated by the Project added to Year 2025 without the Project traffic conditions. This scenario includes a higher percentage of truck traffic than the previous scenarios to provide for a worst-case analysis. The incremental impacts of the Project on future traffic operating conditions (with truck PCEs considered) were then identified.¹⁰³

In consultation with the City of Commerce, a total of 29 study intersections, including 23 signalized and 6 unsignalized, were selected for detailed analysis, including the five primary access points to The Citadel. The study intersections are illustrated in Exhibit 3-7 and listed in Table 3-17.

¹⁰³ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

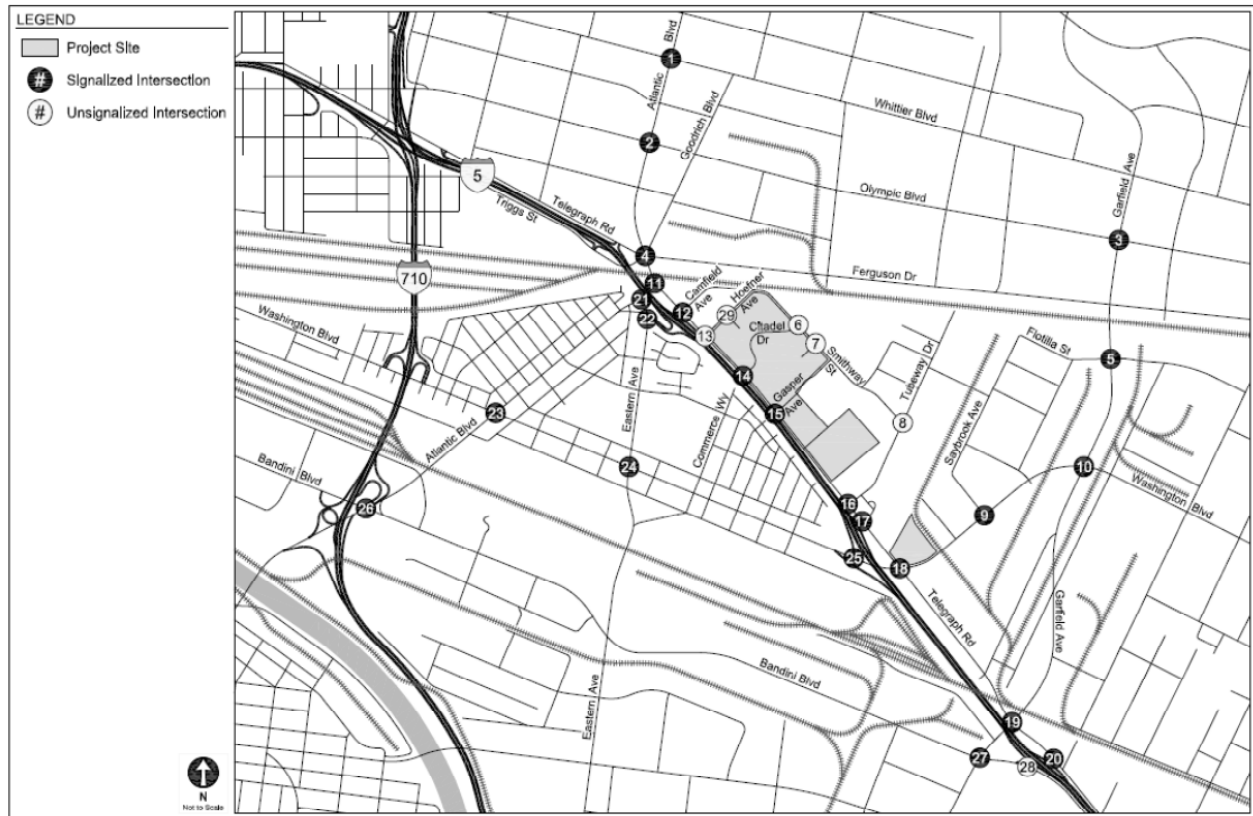


EXHIBIT 3-7
STUDY INTERSECTIONS
 Source: Gibson Transportation Consulting, Inc.

Table 3-17
Study Intersections

Intersection	Jurisdiction
1. Atlantic Boulevard & Whittier Boulevard	City of Commerce
2. Atlantic Boulevard & Olympic Boulevard	City of Commerce
3. Garfield Avenue & Olympic Boulevard	City of Commerce
4. Atlantic Boulevard/Triggs Street & Telegraph Road/Ferguson Drive	City of Commerce
5. Garfield Avenue & Flotilla Street	City of Commerce
6. [a] W Citadel Dwy & Smithway Street	City of Commerce
7. [a] E Citadel Dwy & Smithway Street	City of Commerce
8. [a] Tubeway Avenue & Smithway Street	City of Commerce
9. Washington Boulevard & Saybrook Avenue	City of Commerce
10. Garfield Avenue & Washington Boulevard	City of Commerce
11. Atlantic Boulevard & Telegraph Road	City of Commerce
12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road	City of Commerce/Caltrans
13. [a] Hoefner Avenue & Telegraph Road	City of Commerce
14. Citadel Drive & Telegraph Road	City of Commerce
15. Gaspar Avenue & Telegraph Road	City of Commerce
16. Tubeway Avenue & Telegraph Road	City of Commerce
17. I-5 Ramps/Commerce Casino & Telegraph Road	City of Commerce/Caltrans
18. Washington Boulevard & Telegraph Road	City of Commerce
19. Garfield Avenue & Telegraph Road	City of Commerce
20. I-5 Northbound Ramps & Telegraph Road	City of Commerce/Caltrans
21. Eastern Avenue & Atlantic Boulevard	City of Commerce
22. Eastern Avenue & I-5 Ramps/Stevens Place	City of Commerce/Caltrans
23. Atlantic Boulevard & Washington Boulevard	City of Commerce
24. Eastern Avenue & Washington Boulevard	City of Commerce
25. I-5 Southbound Ramps & Washington Boulevard	City of Commerce/Caltrans
26. Atlantic Boulevard/I-710 Northbound Ramps & Bandini Boulevard	City of Commerce/Caltrans
27. Garfield Avenue & Bandini Boulevard	City of Commerce
28. [a] I-5 Southbound Ramps & Bandini Boulevard	City of Commerce/Caltrans
29. [a] Hoefner Avenue & Citadel Valet Dwy	City of Commerce

Notes: [a] Intersection is unsignalized.

Level of Service (LOS) Methodology

A detailed intersection capacity analysis was conducted for the weekday morning and afternoon peak hours and Saturday midday peak hour for each of these intersections under the six scenarios identified above. Peak period turning movement counts were conducted at the 29 study intersections in May 2016 during the weekday morning and afternoon peak periods and Saturday midday peak period.¹⁰⁴

LOS is a qualitative measure used to describe the condition of traffic flow on the street system, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS D is typically recognized as the minimum acceptable LOS in urban areas. LOS definitions are provided in Table 3-18 for signalized and unsignalized intersections. Intersection capacity calculations were conducted to measure the LOS of the intersections using an overall intersection capacity of 1,600 vehicles per hour per lane (vphpl) and adding a factor of 0.10 to account for the yellow interval clearance. The existing or projected volumes through a signalized intersection are compared to the capacity of the intersection to calculate a volume-to-capacity (V/C) ratio and that ratio is used to determine the LOS at the intersection. For unsignalized intersections, the vehicle delay for the approach with the highest delay in seconds is calculated and used to determine LOS. In accordance with City guidelines, the LOS analyses were conducted using the Intersection Capacity Utilization (ICU) methodology from *Highway Capacity Manual, Special Report 209* (Transportation Research Board, 2000) to obtain the corresponding ICU value for signalized intersections. *2010 Highway Capacity Manual* (Transportation Research Board, 2010) (HCM) methodology was used to obtain delay for unsignalized intersections.

Table 3-18
Level of Service Definitions for Signalized and Unsignalized Intersections

Level of Service	Signalized ICU	Unsignalized) Delay (secs.)	Definition
A	< 0.600	< 10.0	EXCELLENT. No Vehicle waits longer than one red light and no approach phase is fully used.
B	> 0.600 and < 0.700	> 10.0 and < 15.0	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 0.700 and < 0.800	> 15.0 and < 25.0	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 0.800 and < 0.900	> 25.0 and < 35.0	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	> 0.900 and < 1.000	> 35.0 and < 50.0	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.000	> 50.0	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths

Source: Gibson Transportation Consulting, Inc.

¹⁰⁴ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

Regulatory Setting, City of Commerce General Plan

The City of Commerce General Plan includes a Circulation Element that indicates the location and extent of future roadway and intersection improvements. The General Plan also establishes standards that govern a roadway's operation and design. Key General Plan policies that are relevant to the proposed project are listed below.

- *Transportation [Element] Policy 3.1.* The City of Commerce will continue to encourage the use of alternate transportation modes (e.g., shuttles, etc.).
- *Transportation [Element] Policy 3.2.* The City of Commerce will continue to provide residents, employees, and visitors with a local public transit system.
- *Transportation [Element] Policy 3.3.* The City of Commerce will continue to monitor population trends and development that may require modifications to municipal bus system schedules and service routes to better service the major employment, shopping, and service areas located throughout the city.
- *Transportation [Element] Policy 3.4.* The City of Commerce will promote the development of safe and convenient pedestrian access between residential neighborhoods and the parks and schools that serve those neighborhoods.
- *Transportation [Element] Policy 3.5.* The City of Commerce will encourage the maintenance and improvement of "pedestrian-safe" oriented facilities to ensure safe pedestrian movement.
- *Transportation [Element] Policy 3.6.* The City of Commerce will establish bus shelters at heavily used bus stops to increase public recognition and promote the use of the local and regional transit system.
- *Transportation [Element] Policy 3.7.* The City of Commerce, together with the local transit provider and MTA, will provide brochure racks at city hall and community centers.
- *Transportation [Element] Policy 3.8.* The City of Commerce will continue to implement the city's transportation demand management (TDM) measures to improve the efficiency of the city's circulation network.
- *Transportation [Element] Policy 3.9.* The City of Commerce will require major employers to adopt TDM plans pursuant to the city's adopted TDM ordinance.
- *Transportation [Element] Policy 3.10.* The City of Commerce will continue to cooperate with regional transportation agencies to establish routes, stops, and stations in Commerce for the proposed regional mass transit system.

Regulatory Setting, Regional Transportation Improvements

The *Regional Transportation Improvement Program (RTIP)* defines congestion relief projects and programs and is updated every two years. The RTIP must include all federally funded projects and CMP projects that will need Federal or State funds. The RTIP must also be consistent with the Regional Transportation Plan. The *Transportation Improvement Program (TIP)* is a federal- and state-mandated program document that includes information concerning local highway, state highway, and transit projects and services for the following six years. The TIP lists every transportation project that will receive federal funds or is subject to a federally required action (e.g. review for air quality impact). It also covers all capacity-enhancing and non-capacity transportation projects programmed with federal, state, or local funds, as well as the capital and operational details of highway and transit projects. Lastly, the TIP lists all of the following projects that are defined by the Southern California Association of Governments (SCAG) as regionally significant whether or not they require federal funding:

- Freeways;
- State highways;
- Principle arterials (eight-lane divided roadways);
- Major arterials (as defined by county);
- Routes to major activity centers;
- Goods movement routes;
- Intermodal transfer facilities (e.g. rail stations, airports); and,
- Fixed transit routes (e.g. light and heavy rail, commuter rail, bus).

All transportation projects must be listed in the TIP to be eligible for federal and state funding, federal and state permits, and review of Environmental Impact Reports and Environmental Impact Statements.¹⁰⁵

Existing Circulation Network

Primary regional access to the study area is provided by Interstate 5 (I-5) Freeway, which is directly south of the Planning Area, and Interstate 710 (I-710), which is west of the Planning Area. Immediately adjacent to the site, I-5 extends in a northwest/southeast direction. I-710 is an eight-lane freeway that runs north-south from Long Beach to Alhambra. Ramp access to I-5 is provided via Telegraph Road and Washington Boulevard and ramp access to I-710 is provided via Washington Boulevard, Atlantic Boulevard, and Bandini Boulevard. Primary local access to the Planning Area is provided via Telegraph Road, Washington Boulevard, Eastern Avenue, Atlantic Boulevard, and Garfield Avenue.¹⁰⁶ Descriptions of key roadways serving the study area are provided below:

- *Telegraph Road* provides two to three lanes in each direction adjacent to the Planning Area, left-turn pockets at signalized intersections and a two-way left-turn median. Three freeway

¹⁰⁵ Metropolitan Transportation Authority (MTA). *Overview [of] Transportation Improvement Program*. https://www.metro.net/projects/transport_improvement_pgm/. Website accessed January 20, 2019.

¹⁰⁶ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project*. Commerce, California. January 2019.

interchanges are located along this road. Parking is not allowed on either side of the street. The speed limit on Telegraph Road is 45 miles per hour (mph).

- *Hoefner Avenue* provides one lane in each direction. Parking is allowed on both sides of the street. The speed limit on Hoefner Avenue is 25 mph.
- *Gaspar Avenue* provides one lane in each direction. Parking is allowed on the east side of the street. The speed limit on Gaspar Avenue is 25 mph.
- *Camfield Avenue* provides one lane in each direction. Parking is allowed on the east side of the street. The speed limit on Camfield Avenue is 25 mph.
- *Washington Boulevard* is located south of the Planning Area, with two to three lanes in each direction and left-turn pockets at signalized intersections. Parking is generally allowed on both sides of the street. The speed limit on Washington Boulevard is 40 mph.
- *Bandini Boulevard* is an east-west roadway located south of the Planning Area, with two lanes in each direction, left-turn pockets at signalized intersections and a two-way left-turn median. Parking is not allowed on either side of the street west of Bandini Boulevard. The speed limit on Bandini Boulevard is 40 mph.
- *Flotilla Street* is an east-west roadway located north of the Planning Area, with one lane in each direction. Parking is allowed on both sides of the street. The speed limit on Flotilla Street is 25 mph.
- *Ferguson Drive* is an east-west roadway located north of the Planning Area, with two lanes in each direction and left-turn pockets at signalized intersections. Parking is generally allowed on the north side of the street. The speed limit on Ferguson Drive is 25 mph.
- *Olympic Boulevard* is an east-west roadway located north of the Planning Area, with two lanes in each direction and left-turn pockets at signalized intersections. Parking is allowed on both sides of the street. The speed limit on Olympic Boulevard is 35 mph.
- *Whittier Boulevard* is an east-west roadway located north of the Planning Area, with two lanes in each direction and left-turn pockets at signalized intersections. Parking is allowed on both sides of the street. The speed limit on Whittier Boulevard is 30 mph.
- *Smithway Street* provides one lane in each direction and a center turn lane. Parking is allowed on both sides of the street. The speed limit on Smithway Street is 25 mph.
- *Saybrook Avenue* is located east of the Planning Area, with one lane in each direction. Parking is allowed on both sides of the street. The speed limit on Saybrook Avenue is 25 mph.

- *Garfield Avenue* is a north-south roadway located east of the Planning Area (Area 3) with two lanes in each direction, left-turn pockets at signalized intersections, and a two-way left-turn median. Parking is not allowed on either side of the street. The speed limit on Garfield Avenue is 35 mph.
- *Tubeway Avenue* has one lane in each direction. Parking is not allowed on either side of the street. The speed limit on Tubeway Avenue is 25 mph.
- *Atlantic Boulevard* is located west of the Planning Area, with two lanes in each direction, left-turn pockets at signalized intersections, and a two-way left-turn median. Parking is generally allowed on both sides of the street. The speed limit on Atlantic Boulevard is 35 mph.
- *Triggs Street* is a two-lane street adjacent to the I-5 south ramps. Parking is not allowed on either side of the street. The speed limit on Triggs Street is 30 mph.
- *Eastern Avenue* is a north-south roadway located west of the Planning Area with two lanes in each direction, left-turn pockets at signalized intersections, and a raised median. Parking is allowed on both sides of the street. The speed limit on Eastern Avenue is 40 mph.

Existing Public Transit

The Project area is served by Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, City of Commerce Municipal Bus lines, and Montebello Bus lines. The transit routes serving the Project area are described below and shown in Exhibit 3-8 and Exhibit 3-9.

- *Metro Line 18* is a local line that travels from the Wilshire Center to Montebello via 6th Street and Whittier Boulevard, with average headways of 8 to 11 minutes in the morning peak hours and seven minutes in the afternoon peak hours. This line travels along Whittier Boulevard in the vicinity of the project, with a stop at Whittier Boulevard & Atlantic Boulevard.
- *Metro Line 62* is a local line that travels from downtown Los Angeles to Hawaiian Gardens via Telegraph Road, with average headways of 22 to 27 minutes in the morning peak hours and 25 minutes in the afternoon peak hours. This line travels along Telegraph Road in the vicinity of the project, with a stop at Telegraph Road and Gasper Avenue.
- *Metro Line 66* is a local line that travels from Koreatown to the City of Commerce via 8th Street and Olympic Boulevard, with average headways of 18 to 22 minutes in the morning peak hours and 21 minutes in the afternoon peak hours. This line travels along Olympic Boulevard in the vicinity of the project, with a stop at Olympic Boulevard and Atlantic Boulevard.
- *Metro Line 258* is a local line that travels from Alhambra to Paramount via Fremont Avenue and Eastern Avenue, with average headways of 40 to 48 minutes in the morning and 40 minutes in the afternoon peak hours. This line travels along Telegraph Road and Eastern Avenue in the vicinity of the project, with a stop at Telegraph Road and Atlantic Boulevard.

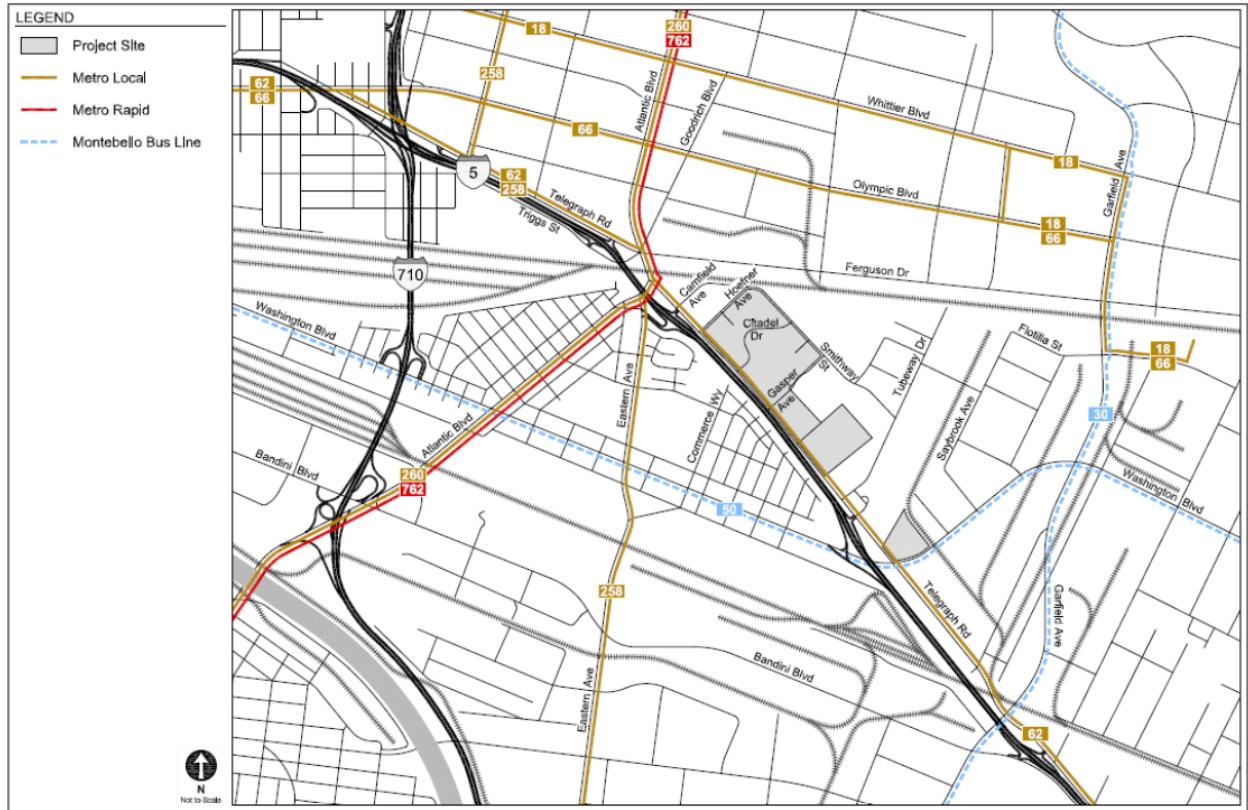


EXHIBIT 3-8
EXISTING TRANSIT SERVICE
Source: Gibson Transportation Consulting, Inc.



EXHIBIT 3-9 EXISTING TRANSIT SERVICE – CITY OF COMMERCE MUNICIPAL BUS LINES

Source: Gibson Transportation Consulting, Inc.

- *Metro Line 260* is a local line that travels from Altadena to the Artesia Blue Line Station via Fair Oaks Avenue and Atlantic Boulevard, with average headways of 16 minutes in the morning and 15 minutes in the afternoon peak hours. This line travels along Atlantic Boulevard in the vicinity of the project, with a stop at Atlantic Boulevard and Goodrich Boulevard.
- *Metro Line 762* is a rapid line that travels from Pasadena to the Artesia Blue Line Station via Atlantic Boulevard, with average headways of 21 to 30 minutes in the morning and 28 minutes in the afternoon peak hours. This line travels along Atlantic Boulevard in the vicinity of the project, with a stop at Atlantic Boulevard and Goodrich Boulevard.
- The *Commerce Blue Line* is a local line that provides service to the northeastern portion of Commerce, with average headways of two hours in the morning peak hours and one hour during afternoon peak hours. This line provides service to Commerce City Hall, Bristow Park, and a local shopping center, with multiple stops adjacent to the Planning Area.
- The *Commerce Red Line* is a local line that provides service to the northeastern portion of Commerce, with average headways of one hour throughout the day. This line provides service to Commerce City Hall, Rosewood Park, and a local shopping center, with multiple stops adjacent to the project.
- The *Commerce Green Line* is a local line that provides service to the western portion of Commerce, with average headways of one hour throughout the day. This line provides service to the Commerce Metrolink Station, Commerce City Hall and a local shopping center, with multiple stops adjacent to the Planning Area.
- The *Commerce Orange Line* is a local line that provides service to the western portion of Commerce, with average headways of 80 minutes throughout the day. This line provides service to The Citadel, Commerce Metrolink Station, and Commerce City Hall, with multiple stops adjacent to the Planning Area.
- The *Commerce Yellow Line* is a local line that provides service to the western portion of Commerce, with average headways of one hour throughout the day. This line provides service to Commerce City Hall, Commerce Metrolink Station, and a local shopping center, with multiple stops adjacent to the Planning Area.
- The *Montebello M-50 Line* is a local line that provides service from downtown Los Angeles to La Mirada, with average headways of 35 minutes in the morning and afternoon peak hours. This line travels along Washington Boulevard in the vicinity of the Planning Area, with stops at Atlantic Boulevard and Washington Boulevard.

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Table 3-19 summarizes the transit routes operating in the vicinity of the Planning Area. It shows the routes organized by service providers, the type of service (peak vs. off-peak, rapid vs. local), and frequency of service, as described above. The average headways during the peak hour were estimated using detailed October 2017 trip and ridership data provided by Metro.¹⁰⁷

Table 3-19
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway in Minutes			
			AM Peak Hour		PM Peak Hour	
Metro Bus Service			NB/EB	SB/WB	NB/EB	SB/WB
18. Downtown Los Angeles Montebello/Wilshire/Western Station via 6 th Street and Whittier Boulevard	Local	2:30 AM – 1:30 AM	11	11	9	8
62. Downtown Los Angeles Hawaiian Gardens via Telegraph Road	Local	5:00 AM – 12:00 AM	24	22	27	22
66. Downtown Los Angeles Montebello Wilshire Center via 8 th Street and Olympic Boulevard	Local	4:00 AM – 12:30 AM.	18	22	22	22
258. Alhambra-Paramount via Fremont Avenue and Eastern Avenue	Local	5:30 AM – 8:00 PM.	40	48	40	48
260. Pasadena – Artesia Blue Line Station	Local	5:00 AM – 11:00 AM	16	16	15	15
762. Altadena – Artesia Blue Line Station via Fair Oaks Avenue and Atlantic Boulevard	Rapid	5:30 AM – 8:30 PM	21	23	30	27
City of Commerce Municipal Bus			NB/EB	SB/WB	NB/EB	SB/WB
Red – Red Line	Local	6:30 AM – 7:45 AM	60	N/A	60	N/A
Green – Green Line	Local	7:00 AM – 7:00 PM	60	N/A	60	N/A
Orange – Orange Line	Local	7:00 AM – 7:00 PM	80	N/A	80	N/A
Yellow – Yellow Line	Local	11:30 AM – 2:30 PM	60	N/A	60	N/A
Montebello Bus Lines			NB/EB	SB/WB	NB/EB	SB/WB
M-30 San Marino – South Gate via Garfield Avenue	Local	4:45 AM – 10:30 PM	40	48	48	48
M-50 Downtown Los Angeles – La Mirada via Washington Boulevard	Local	4:30 AM – 11:15 PM	34	30	34	34

Source: Gibson Transportation Consulting, Inc.

¹⁰⁷ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

Existing Traffic Volumes and Peak Hour LOS

Weekday morning and afternoon peak hour and Saturday midday peak hour traffic counts were conducted at the 29 study intersections in May 2016. Intersection lane configurations drawings are provided in the Traffic Study (refer to Figure 4 provided in the Traffic Study). Intersection turning movement count data sheets are provided in Appendix A of the Traffic Study (the Traffic Study Appendices is provided in Appendix Volume 3, which is provided under a separate cover).¹⁰⁸

Five study intersections were recounted in 2018 to compare to the earlier Year 2016 intersection count results. The 2018 results were similar to the 2016 results and showed very little growth in traffic during the peak hours. Nevertheless, for conservative purposes, the 2016 counts were expanded by one percent per year to reflect *Existing (Year 2018) Conditions*.¹⁰⁹

The existing (Year 2018) weekday morning and afternoon peak hours and Saturday midday peak hour turning movements presented in Figures 5 and 6 in the Traffic Study, respectively, were used in conjunction with the LOS methodology described above to determine existing (Year 2018) operating conditions at each of the study intersections.¹¹⁰ The Traffic Study is provided in Appendix Volume 2, which is provided under a separate cover.

Table 3-20 summarize the weekday morning and afternoon peak hours and Saturday midday peak hour V/C ratio or delay and corresponding LOS at each study intersection under *Existing Conditions* for signalized and unsignalized intersections, respectively. As shown in Table 3-20, 19 of the 23 signalized intersections currently operate at LOS D or better during the analyzed peak hours under Existing Conditions. The remaining four signalized intersections currently operate at LOS E during the afternoon peak hour. As shown in Table 3-20, four unsignalized intersections currently operate at LOS C or better during the analyzed peak hours. The remaining two unsignalized intersections currently operate at LOS E or F during at least one of the analyzed peak hours.¹¹¹

¹⁰⁸ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

¹⁰⁹ Ibid.

¹¹⁰ Ibid.

¹¹¹ Ibid.

Table 3-20
Existing Conditions (Year 2018) Intersection Peak Hour LOS

Intersection	Peak Hour	V/C Ratio	LOS
1. Atlantic Boulevard and Whittier Boulevard (signalized)	AM	0.723	C
	PM	0.897	D
	MD	0.812	D
2. Atlantic Boulevard and Olympic Boulevard (signalized)	AM	0.716	C
	PM	0.921	E
	MD	0.807	D
3. Garfield Boulevard and Olympic Boulevard (signalized)	AM	0.890	D
	PM	0.986	E
	MD	0.711	C
4. Atlantic Avenue/Triggs Street and Telegraph Road/Ferguson Drive (signalized)	AM	0.728	C
	PM	0.891	D
	MD	0.668	B
5. Garfield Avenue and Flotilla Street (signalized)	AM	0.749	C
	PM	0.884	D
	MD	0.538	A
9. Washington Boulevard and Saybrook Avenue (signalized)	AM	0.447	A
	PM	0.411	A
	MD	0.304	A
10. Garfield Avenue and Washington Boulevard (signalized)	AM	0.747	C
	PM	0.869	D
	MD	0.680	B
11. Atlantic Avenue and Telegraph Road (signalized)	AM	0.697	B
	PM	0.948	E
	MD	0.834	D
12. I-5 Northbound Ramps/Camfield Avenue and Telegraph Road (signalized)	AM	0.504	A
	PM	0.711	C
	MD	0.713	C
14. Citadel Drive and Telegraph Road (signalized)	AM	0.290	A
	PM	0.368	A
	MD	0.497	A
15. Gaspar Avenue and Telegraph Road (signalized)	AM	0.301	A
	PM	0.341	A
	MD	0.409	A
16. Tubeway Avenue and Telegraph Road (signalized)	AM	0.377	A
	PM	0.402	A
	MD	0.411	A
17. I-5 North Ramps/Commerce Casino and Telegraph Road (signalized)	AM	0.596	A
	PM	0.786	C
	MD	0.765	C
18. Washington Boulevard and Telegraph Road (signalized)	AM	0.687	B
	PM	0.778	C
	MD	0.699	B
19. Garfield Avenue and Telegraph Road (signalized)	AM	0.738	C
	PM	0.723	C
	MD	0.551	A

Table 3-20
Existing Conditions (Year 2018) Intersection Peak Hour LOS
(continued)

Intersection	Peak Hour	Existing Conditions	
		V/C Ratio	LOS
20. I-5 Northbound Ramps and Telegraph Road (signalized)	AM	0.823	D
	PM	0.877	D
	MD	0.612	B
21. Eastern Avenue and Atlantic Boulevard (signalized)	AM	0.705	C
	PM	0.954	E
	MD	0.757	C
22. Eastern Avenue and I-5 Ramps/Stevens Place (signalized)	AM	0.451	A
	PM	0.413	A
	MD	0.402	A
23. Atlantic Boulevard and Washington Boulevard (signalized)	AM	0.469	A
	PM	0.683	B
	MD	0.490	A
24. Eastern Avenue and Washington Boulevard (signalized)	AM	0.382	A
	PM	0.445	A
	MD	0.307	A
25. I-5 Southbound Ramps and Washington Boulevard (signalized)	AM	0.562	A
	PM	0.678	B
	MD	0.660	B
26. Atlantic Boulevard and Bandini Boulevard (signalized)	AM	0.651	B
	PM	0.764	C
	MD	0.500	A
27. Garfield Avenue and Bandini Boulevard (signalized)	AM	0.811	D
	PM	0.857	D
	MD	0.532	A
6. West Citadel Driveway and Smithway Street (unsignalized)	AM	10.6	B
	PM	13.1	B
	MD	13.1	B
7. East Citadel Driveway and Smithway Street (unsignalized)	AM	11.5	B
	PM	13.4	B
	MD	12.8	B
8. Tubeway Avenue and Smithway Street (unsignalized)	AM	12.7	B
	PM	15.1	C
	MD	11.4	B
13. Hoefner Avenue and Telegraph Road (unsignalized)	AM	23.1	C
	PM	40.3	E
	MD	60.3	F
28. I-5 Southbound Ramps and Bandini Boulevard (unsignalized)	AM	Overflow	F
	PM	Overflow	F
	MD	45.2	E
29. Hoefner Avenue and Citadel Valet Driveway (unsignalized)	AM	9.1	A
	PM	9.6	A
	MD	10.5	B

Source: Gibson Transportation Consulting, Inc.

3.11.4 ENVIRONMENTAL IMPACTS

3.11.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE, OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO, INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS, AND MASS TRANSIT.

DISCUSSION OF IMPACT ANALYSIS

The *Future without Project* traffic projections reflect anticipated future traffic increases that can be expected from two sources. The first is ambient growth in traffic, which reflects general increases in traffic due to regional growth and development. The second source is traffic generated by specific future projects located within or in the vicinity of the study area. Existing traffic is expected to increase between Year 2018 and Year 2025 as a result of general area-wide and regional growth and development.¹¹²

The *2010 Congestion Management Program for Los Angeles County* (Metro, 2010) (CMP) provides general growth factors based on regional modeling. As shown in Exhibit D-1 of the CMP, the Planning Area is located in Regional Statistical Area #21, which is estimated to experience a total regional growth in traffic of 8.5% between 2015 and 2025, which equates to an ambient traffic growth factor of 0.85% per year. However, to provide a conservative analysis, an ambient growth factor of one percent per year was applied to adjust the existing traffic volumes to reflect the effects of the regional growth and development by year 2025. The total growth adjustment applied over the seven-year period was seven percent.¹¹³

CUMULATIVE (RELATED) PROJECTS

Information regarding potential future projects either under construction, planned, or proposed for development within or near the study area was obtained from several sources. These sources include City staff as well as recent studies conducted in the area. No planned or proposed developments beyond City boundaries are expected to have a noticeable impact on traffic levels in the Planning Area.¹¹⁴ These related projects are described in Table 3-21 and their locations are illustrated in Exhibit 4-1 herein in Section 4.

¹¹² Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

¹¹³ Ibid.

¹¹⁴ Ibid.

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Table 3-21
Related Projects

Project	Land Use	Size	Weekday			Saturday	
			Daily Trips	AM Peak Hour	PM Peak Hour	Daily Trips	Midday Peak Hour
1. General Plan Amendment 7316 Gage Avenue	Manufacturing and Office	156,650 SF* 16,130 SF	776	139	138	1,042	156
2. Retail Center Southwest Corner of Atlantic Boulevard and Washington Boulevard	Retail	148,200 SF	5,595	139	565	6,835	667
3. Retail Use 7344 Bandini Road	Retail	25,250 SF	953	24	96	1,165	114
4. Costco Gas Station 6340 Washington Boulevard	Gas Station	2,306 SF	1,481	94	114	2,500	182
5. Warehouse Building 5701 Union Pacific	Warehousing	15,000 SF	26	3	3	2	1
6. Residential 4906 Nobel Street	Single-Family Housing	1 DU*	9	1	1	10	1
7. Paris Baguette 6100 Malt Avenue	Bakery	16,300 SF	615	15	621	752	73
8. Warehouse Building 6605 Flotilla Street	Warehousing	42,131 SF	73	7	8	6	2
9. Commercial Entertainment 5427 Washington Boulevard	Entertainment	4,860 SF	183	5	19	224	22
10. Escape Room 5121 South Atlantic Boulevard	Entertainment	4,682 SF	177	4	18	216	21
11. Retail Use 5521 Telegraph Road	Retail	4,206 SF	159	4	16	194	19
12. Warehouse Building 6800 East Washington Boulevard	Warehousing	40,835 SF	71	7	8	6	2
13. Warehouse Building 6300 Telegraph Road	Warehousing	83,000 SF	144	14	16	12	4
14. Warehouse Building 7140 Bandini Boulevard	Warehousing	185,000 SF	322	31	35	28	9
15. AltaMed Office Conversion 2035 Camfield Avenue	Office	78,316 SF	763	91	90	173	42
16. Vehicle Repair 7500 Wellman Street	Auto Care Center	2,000 SF	33	5	6	47	13
17. Fast Food Restaurant 5556 East Washington Boulevard	Fast Food	2,600 SF	1,224	104	85	1,602	143
18. Retail 5200 Triggs Street	Shopping Center	16,000 SF	604	15	61	738	72
Total Related Project Trips			13,208	702	1,341	15,552	1,543

Note

SF - square feet; DU - dwelling unit

Trip generation estimates based on *Trip Generation, 10th Edition* (Institute of Transportation Engineers, 2017).

As shown in Table 3-21, 11 projects are currently under consideration that could add traffic to the study intersections. As detailed, weekday morning and afternoon peak hour and Saturday midday peak hour trip generation estimates for the related projects were calculated based on the trip generation rates contained within *Trip Generation, 10th Edition* (Institute of Traffic Engineers, 2017) or taken directly from the traffic study for a particular project. In total, the related projects would add approximately 13,208 weekday daily trips, including 702 morning and 1,341 afternoon peak hour trips, and 15,552 Saturday daily trips, including 1,543 Saturday midday peak hour trips, to the local roadway network.¹¹⁵

The geographic distribution of traffic generated by developments such as those included in this analysis depend on several factors. These factors include the type and density of the proposed land uses, the geographic distribution of the population from which employees and/or patrons of the proposed developments may be drawn, the geographic distribution of activity centers (employment, commercial, and other) to which residents of proposed residential projects may be drawn, and the location of the Planning Area in relation to the surrounding street system. The trip generation estimates were assigned to the local street system using the trip distribution developed according to the factors described above for each individual project. The resulting related project traffic volumes for the weekday morning and afternoon peak hours and Saturday midday peak hour are provided in the Traffic Study (refer to Figures 8 and 9, respectively).¹¹⁶

Future Traffic Including Truck Traffic

Forecasts of *Future without Project* traffic volumes were developed by adding the traffic expected to be generated by the list of related development projects to the background *Existing (Year 2018)* volumes adjusted by area-wide traffic growth. The resulting traffic volumes at the 29 study intersections for the weekday morning and afternoon and Saturday midday peak hour, as illustrated in the Traffic Study (refer to Figures 10 and 11, respectively).

To provide a conservative analysis, a set of future traffic volumes were developed to include a higher percentage of truck traffic than the existing analysis. Based on existing observations and general characteristics of the Planning Area, between five to ten percent of the total traffic along major streets and intersections within the Study Area were assumed to be attributed to truck traffic. Minor streets and minor turning movements were assumed to be made up of two to five percent truck traffic. Each truck trip was then factored up by 2.5 to represent PCE using the street system. The adjusted intersection volumes resulting from the truck PCE factors for weekday morning and afternoon and Saturday midday peak hours are shown in the Traffic Study (refer to Figures 12 and 13, respectively).¹¹⁷

¹¹⁵ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019. The Traffic Study is provided under a separate cover in Appendix Volume 2.

¹¹⁶ Ibid.

¹¹⁷ Ibid.

While there are some major projects proposed for the street system surrounding the Planning Area including improvements to I-5 corridor adjacent to the Planning Area, none of the planned improvements will be completed by the opening year of the Project (Year 2025), and, therefore, no background roadway improvements were assumed to be in place in the future scenarios.¹¹⁸

Project Trip Generation

The trip generation rates used for estimating future trips for the proposed Project were developed using the trip generation rates contained within *Trip Generation, 10th Edition*. As mentioned, the Project site currently contains 492,883 square feet of retail GLA and 179,518 square feet of office GLA. The Project plans to construct an additional 520,466 square feet of retail GLA, 770 hotel rooms within four hotel buildings, and an entertainment center, which could host a 102-bay Topgolf center or similar entertainment destination type use, on The Citadel site. In addition, the Project includes construction of 55,015 square feet of light industrial use, 13,400 square feet of restaurant space, and 70,000 square feet of office GLA on the empty 10-Acre parcel southeast of The Citadel.

A mixed-use internal capture credit was applied to account for person trips made between distinct land uses within a mixed-use development (e.g., office employees, hotel guests, and other patrons of the Project visiting the retail/commercial uses). A 10%, 50%, and 10% pass-by trip credit was applied to the shopping center space, fast-food restaurant and quality restaurant, respectively. This trip credit is consistent with trip credits taken for other shopping center and restaurant projects in the vicinity of the Planning Area, and is more conservative (i.e., lower) than the pass-by rates for shopping centers and restaurants found in *Trip Generation, 10th Edition*. Pass-by trip credits were not taken at the following intersections that are located adjacent to the Planning Area and, therefore, do not qualify for pass-by credit:

- W. Citadel Driveway & Smithway Street;
- E. Citadel Driveway & Smithway Street;
- Hoefner Avenue & Telegraph Road;
- Citadel Drive & Telegraph Road;
- Gasper Avenue & Telegraph Road;
- Washington Boulevard & Telegraph Road; and,
- Hoefner Avenue & Citadel Valet Driveway.

Table 3-22 presents the trip generation estimates for the Area 1 and Area 2 portion of the Planning Area and Table 3-23 presents the trip generation estimates for Area 3 (the portion of the project on the 10-acre parcel). The trip generation projections for the project include an estimate of the amount of internal capture among the various land uses within the project. The internal capture of trips within a mixed-use project recognizes that some trips are “captured” within the boundaries of the project, and, therefore, these internal trips do not travel on the external roadway system.

¹¹⁸ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

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The base trip generation estimates in Table 3-22 and Table 3-23 assume that each land use is located in a freestanding, independent parcel, which is not the case within the Planning Area. For example, a portion of the inbound trips to restaurants within the Project will be made by retail patrons already within the site. The trip will leave the retail shop and move to the restaurant use. That outbound retail trip and inbound restaurant trip are “captured” within the site, and, therefore, these trips do not use the external street system. Table 3-22 and Table 3-23 reflect the level of internal trip capture that is expected among the various land uses on the site. These internal trip connections are depicted graphically in Appendix C of the Traffic Study, which can be found in Appendix Volume 3 under a separate cover.¹¹⁹

Table 3-22
Project Trip Generation Estimates (Citadel Site)

Land Use and ITE Land Use Code (rate)	Daily	AM Peak Hour	PM Peak Hour	Daily	Mid day Peak Hour
820. Shopping Center: 492,883 SF	17,786	398	1,769	26,357	2,400
710. Office 179,518 SF	1,872	195	198	397	95
310. Hotel 201 rooms	1,680	94	121	1,646	145
Subtotal – Project Trips Prior to Reductions	21,338	687	2,088	28,400	2,640
Less Mixed-Use Internal Capture Office – 10%	(187)	(20)	(20)	(40)	(9)
Less Mixed-Use Internal Capture Hotel – 25%	(420)	(24)	(31)	(412)	(36)
Less Mixed-Use Internal Capture Shopping Center – (Based on Other Uses)	(607)	(44)	(51)	(452)	(45)
Subtotal – Less Mixed-Use Internal Capture Credit	(1,214)	(88)	(102)	(904)	(90)
Less Passby Reduction Shopping Center – 10%	(1,718)	(35)	(172)	(2,591)	(236)
Total - Existing Uses	18,406	564	1,814	24,905	2,314
820. Shopping center [e]	29,036	658	3,016	41,206	4,243
710. Office	1,872	195	198	397	95
310. Hotel	1,680	94	121	1,646	145
312. Business Hotel	1,704	165	136	2,455	195
330. Resort Hotel	1,879	111	142	2,239	187
[d] Topgolf	1,826	32	183	3,121	312
Subtotal – Project Trips Prior to Reductions	37,997	1,255	3,796	51,064	5,177
Less Mixed-Use Internal Capture Office–10%	(187)	(20)	(20)	(40)	(9)
Less Mixed-Use Internal Capture Hotel–25%	(420)	(24)	(31)	(412)	(36)
Less Mixed-Use Internal Capture Bus. Hotel-5%	(426)	(41)	(34)	(614)	(49)
Less Mixed-Use Internal Capture Res. Hotel-50%	(940)	(56)	(72)	(1,120)	(94)
Less Mixed-Use Internal Capture Topgolf – 25%	(457)	(8)	(46)	(780)	(79)
Less Mixed-Use Internal Capture Shopping Center – (Based on Other Uses)	(2,430)	(149)	(203)	(2,966)	(267)
Subtotal - Less Mixed-Use Internal Capture Credit	(4,860)	(298)	(406)	(5,932)	(534)
Less Pass-By Reduction Shopping Center – 10%	(2,661)	(51)	(282)	(3,824)	(397)
Total – Project Upon Completion	30,476	906	3,108	41,308	4,246
Net New Total Project Trips	12,070	342	1,294	16,403	1,932

¹¹⁹ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

As shown in Table 3-22, Area 1 and Area 2 are expected to generate a net increase of 12,070 weekday daily trips, including a net increase of 342 weekday morning peak hour trips (221 inbound, 121 outbound), 1,294 weekday afternoon peak hour trips (634 inbound, 660 outbound), and 16,403 Saturday daily trips, including 1,932 Saturday midday peak hour trips (1,012 inbound, 920 outbound).¹²⁰

As indicated in Table 3-23, the Area 3 portion of the Planning Area is expected to generate a net increase of 3,226 weekday daily trips, including a net increase of 284 weekday morning peak hour trips (189 inbound, 95 outbound), 270 weekday afternoon peak hour trips (105 inbound, 165 outbound), and a net increase of 3,216 Saturday daily trips, including 329 Saturday midday peak hour trips (172 inbound, 157 outbound).¹²¹

Table 3-23
Project Trip Generation Estimates (Area 3)

Land Use and ITE Land Use Code (rate)	Weekday			Saturday	
	Daily	AM Peak Hour	PM Peak Hour	Daily	Midday Peak Hour
Proposed Conditions					
110. General Light Industrial	273	39	35	109	23
934. Fast-Food Restaurant with Drive-Thru	3,956	338	274	5,175	461
710. General Office	751	92	81	155	37
931. Quality Restaurant	419	4	39	450	53
Subtotal – Project Trips Prior to Reductions	5,399	473	429	5,889	574
Less Mixed-Use Internal Capture Light Ind. – 10%	(27)	(4)	(4)	(11)	(2)
Less Mixed-Use Internal Capture Office – 10%	(75)	(9)	(8)	(16)	(4)
Less Mixed-Use Internal Capture Fast Food Restaurant – (Based on Other Uses)	(102)	(13)	(12)	(27)	(6)
Subtotal – Less Mixed-Use Internal Capture Credit	(204)	(26)	(24)	(54)	(12)
Less Pass-By Reduction Fast-Food Rest. – 50%	(1,927)	(163)	(131)	(2,574)	(228)
Less Pass-By Reduction Quality Restaurant – 10%	(42)	0	(4)	(45)	(5)
Subtotal – Less Pass-By Reduction Credit	(1,969)	(163)	(135)	(2,619)	(233)
Net Total	3,226	284	270	3,216	329

Source: Gibson Transportation Consulting, Inc.

Project Trip Distribution

The geographic distribution of traffic generated by the project was derived using the methods described previously for related project trip distribution. The general geographic trip distribution pattern used in the assignment of project-generated traffic is illustrated in Figures 14A and 14B included in the Traffic Study, which is provided under a separate cover in Appendix Volume 2. The project trip generation estimates summarized in Table 3-22 and Table 3-23 and the distribution patterns illustrated in the Traffic Study Figures 14A and 14B were used to assign the project-generated traffic to the local and regional street

¹²⁰ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

¹²¹ Ibid.

system and through the 29 study intersections. As mentioned previously, no credit was taken for pass-by traffic at the seven study intersections that border or is internal to the project sites.¹²² Exhibits 3-10 A,B,C and 3-11 A,B,C (also Figures 15 and 16 included in the traffic Study) illustrate the assignment of project-generated peak hour traffic volumes at each of the 29 study intersections during a typical weekday and Saturday mid-day, respectively.

Future with Truck Traffic with Project Conditions (Year 2025)

The *Project-generated traffic* volumes in Exhibit 3-12 (A, B, and C) and Exhibit 3-12 (A, B, and C) were then added to the *Future with Truck Traffic without Project* volumes. As shown in Table 3-24, nine of the 23 signalized intersections are anticipated to operate at LOS D or better during the analyzed peak hours under Future with Truck Traffic with Project Conditions. The remaining 14 signalized intersections are anticipated to operate at LOS E or F during at least one of the analyzed peak hours. Of the 23 signalized intersections, the following 13 signalized intersections are anticipated to result in a significant impact during at least one of the analyzed peak hours:¹²³

2. Atlantic Boulevard & Olympic Boulevard;
4. Atlantic Boulevard/Triggs Street & Telegraph Road/Ferguson Drive;
10. Garfield Avenue & Washington Boulevard;
11. Atlantic Boulevard & Telegraph Road;
12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road;
14. Citadel Drive & Telegraph Road;
17. I-5 Ramps/Commerce Casino & Telegraph Road;
18. Washington Boulevard & Telegraph Road;
20. I-5 Northbound Ramps & Telegraph Road;
21. Eastern Avenue & Atlantic Boulevard;
23. Atlantic Boulevard and Washington Boulevard;
25. I-5 Southbound Ramps & Washington Boulevard; and,
27. Garfield Avenue & Bandini Boulevard.

LOS calculation worksheets are provided in Appendix B of the Traffic Study, which is provided under Appendix Volume 3 in a separate cover.

¹²² Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

¹²³ Ibid.

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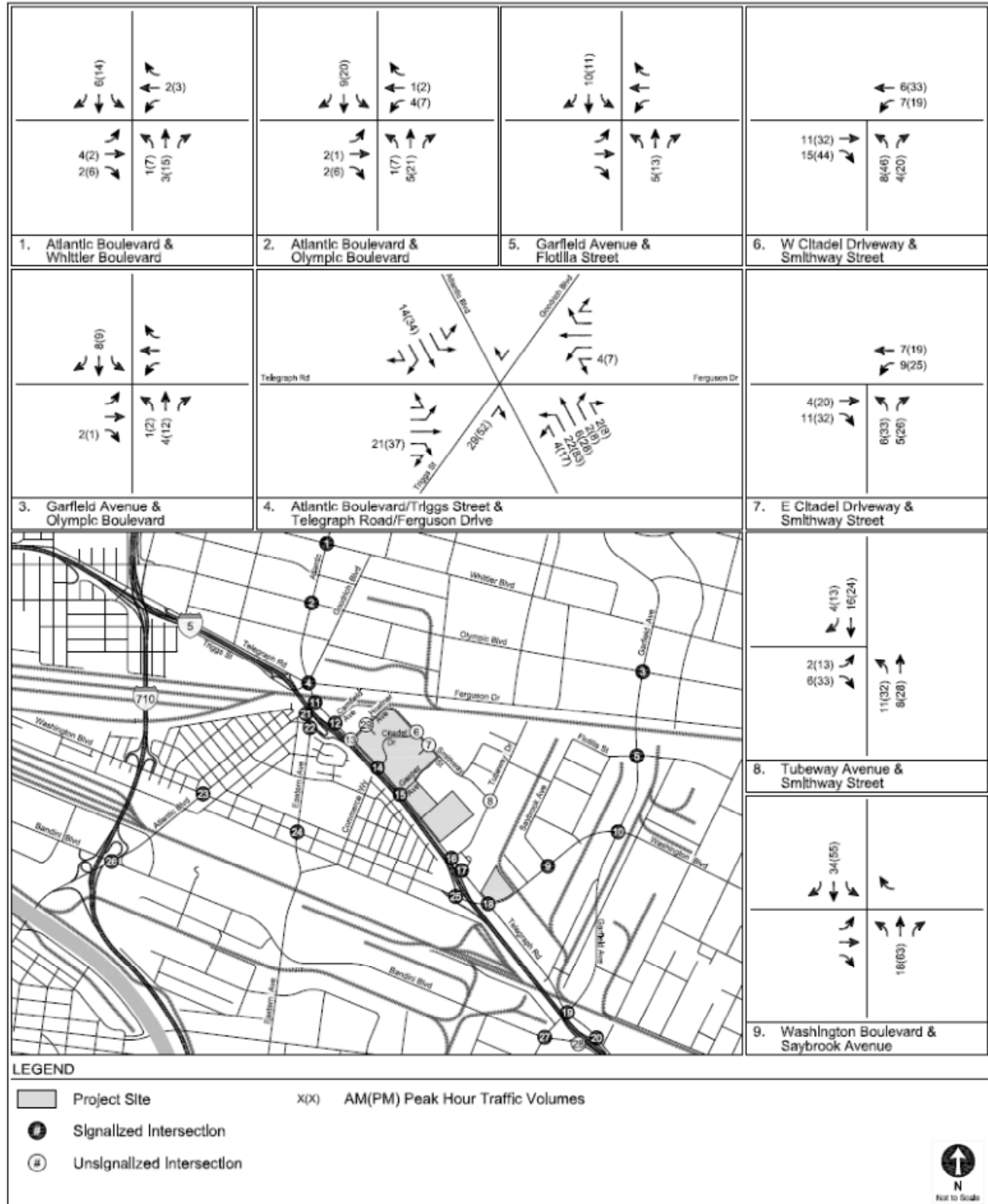


EXHIBIT 3-10A
WEEKDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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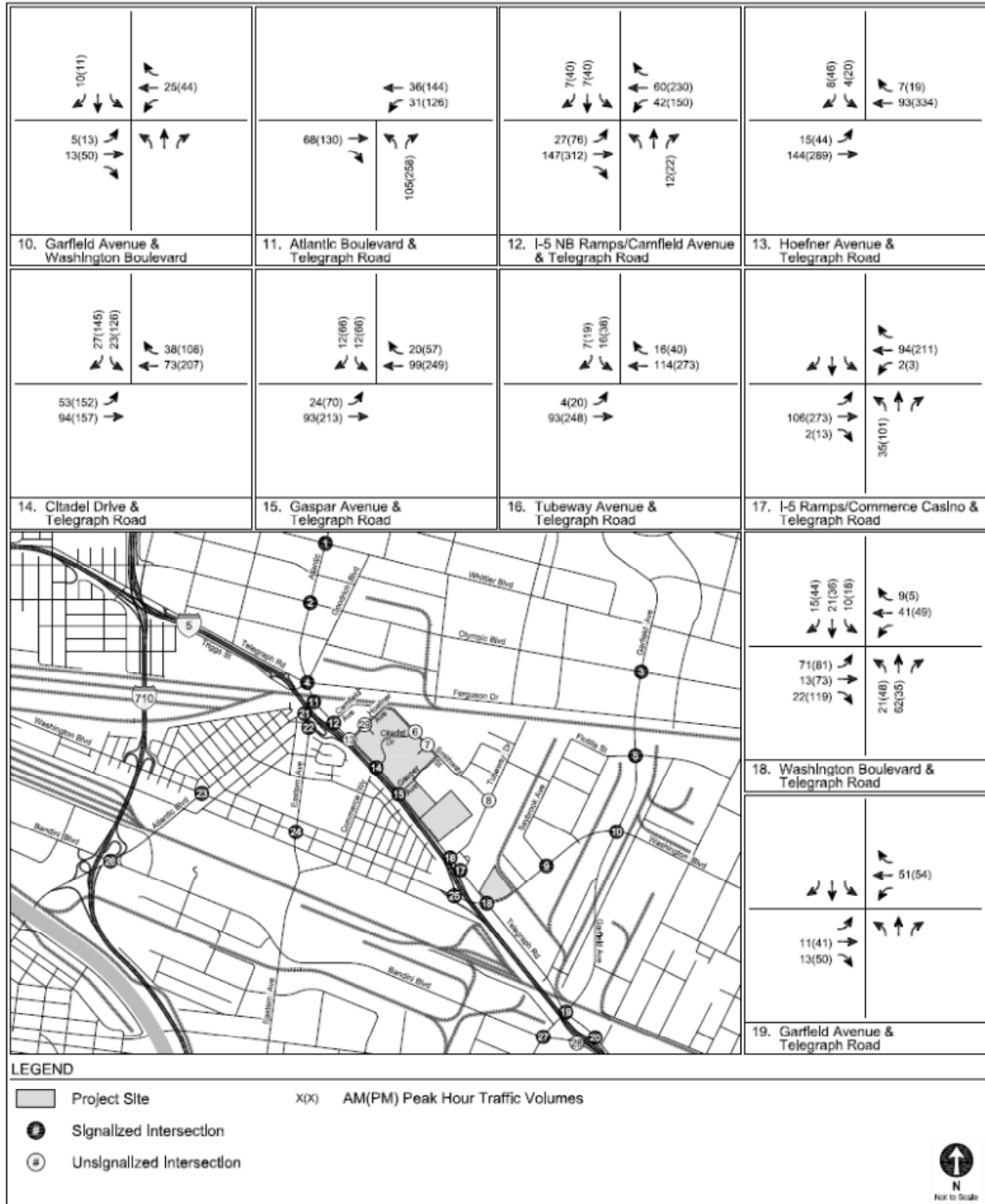


EXHIBIT 3-10B
WEEKDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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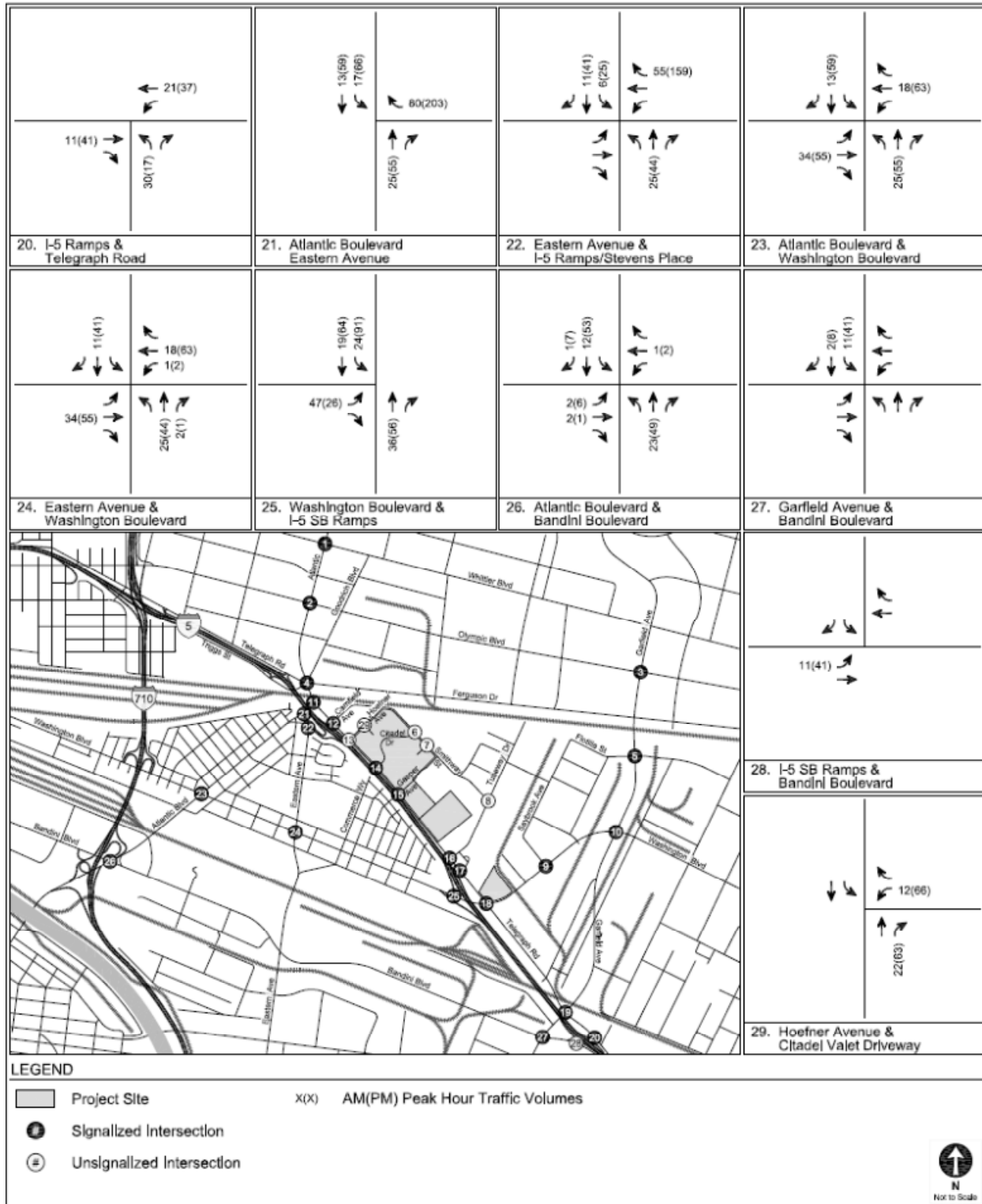


EXHIBIT 3-10C
WEEKDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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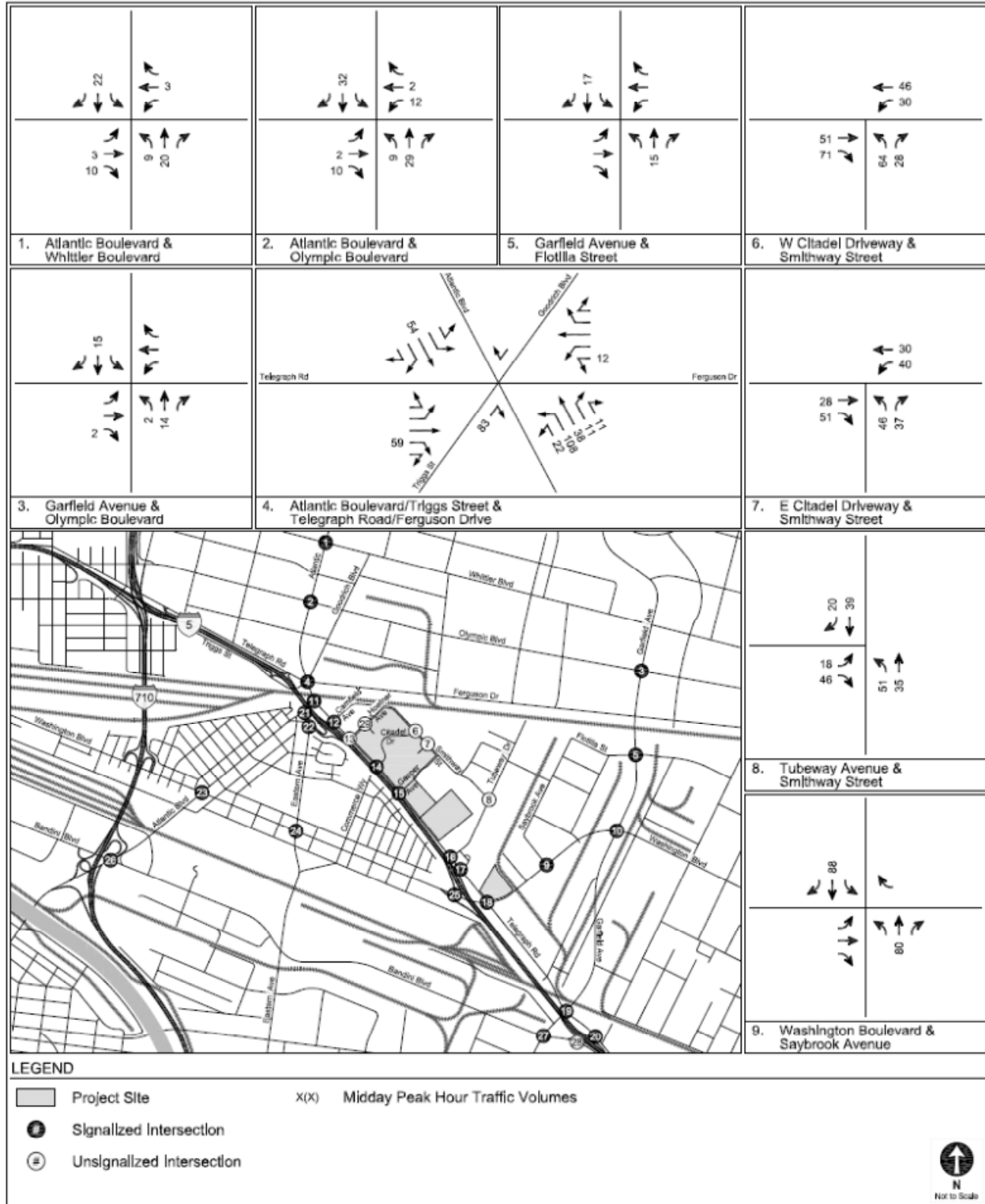


EXHIBIT 3-11A
SATURDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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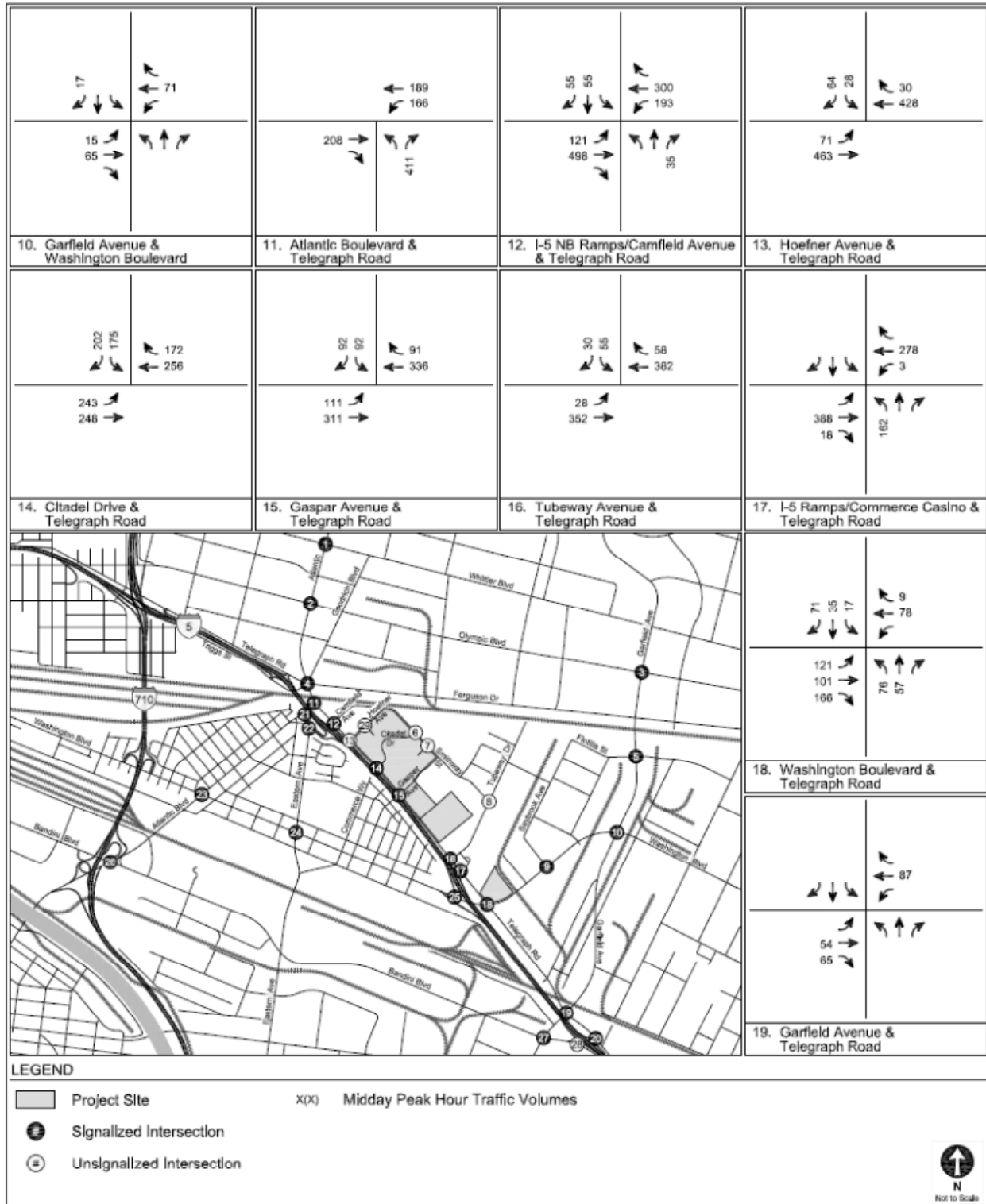


EXHIBIT 3-11B
SATURDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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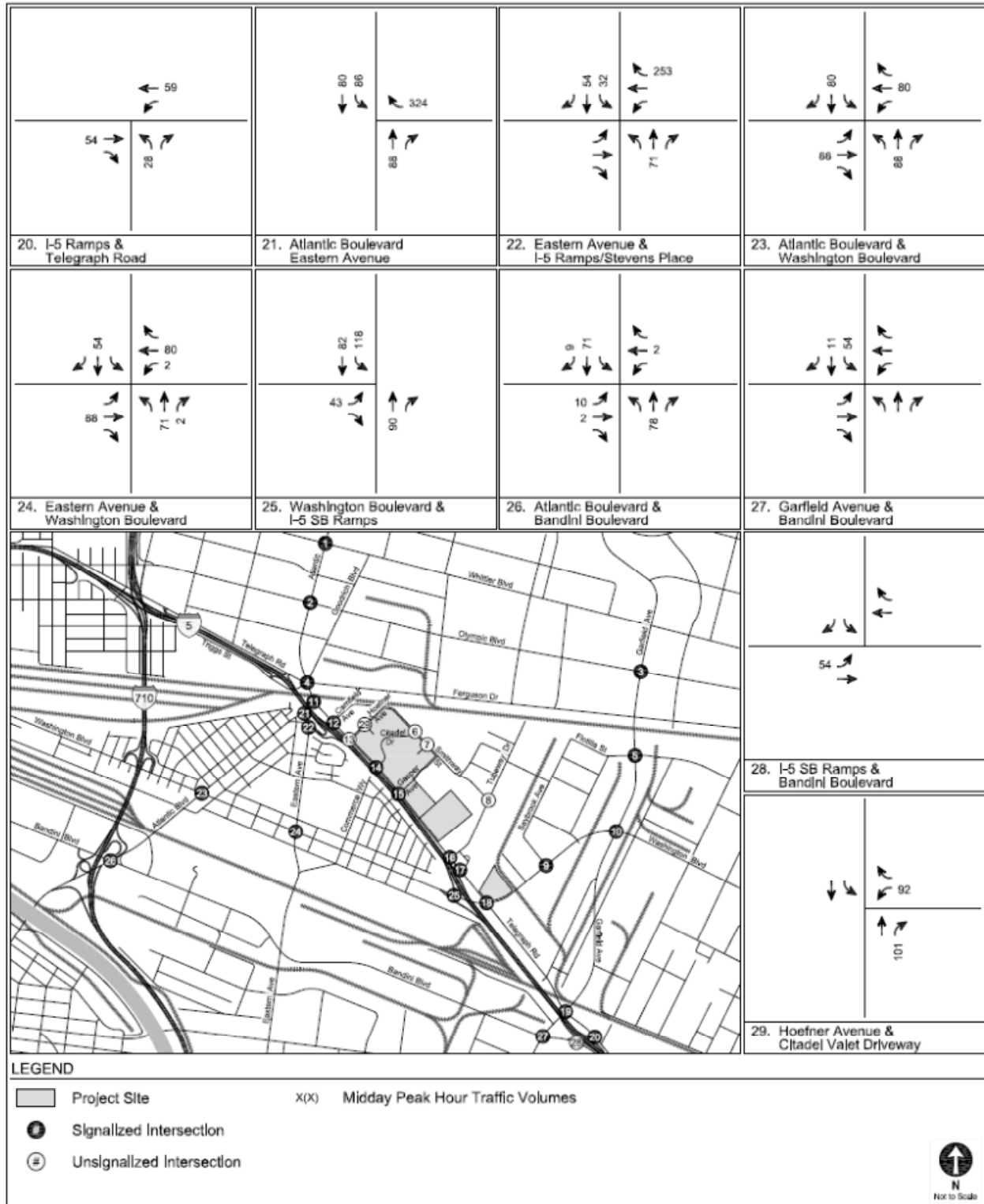


EXHIBIT 3-11C
SATURDAY PEAK HOUR TRAFFIC VOLUMES
Source: Gibson Transportation Consulting, Inc.

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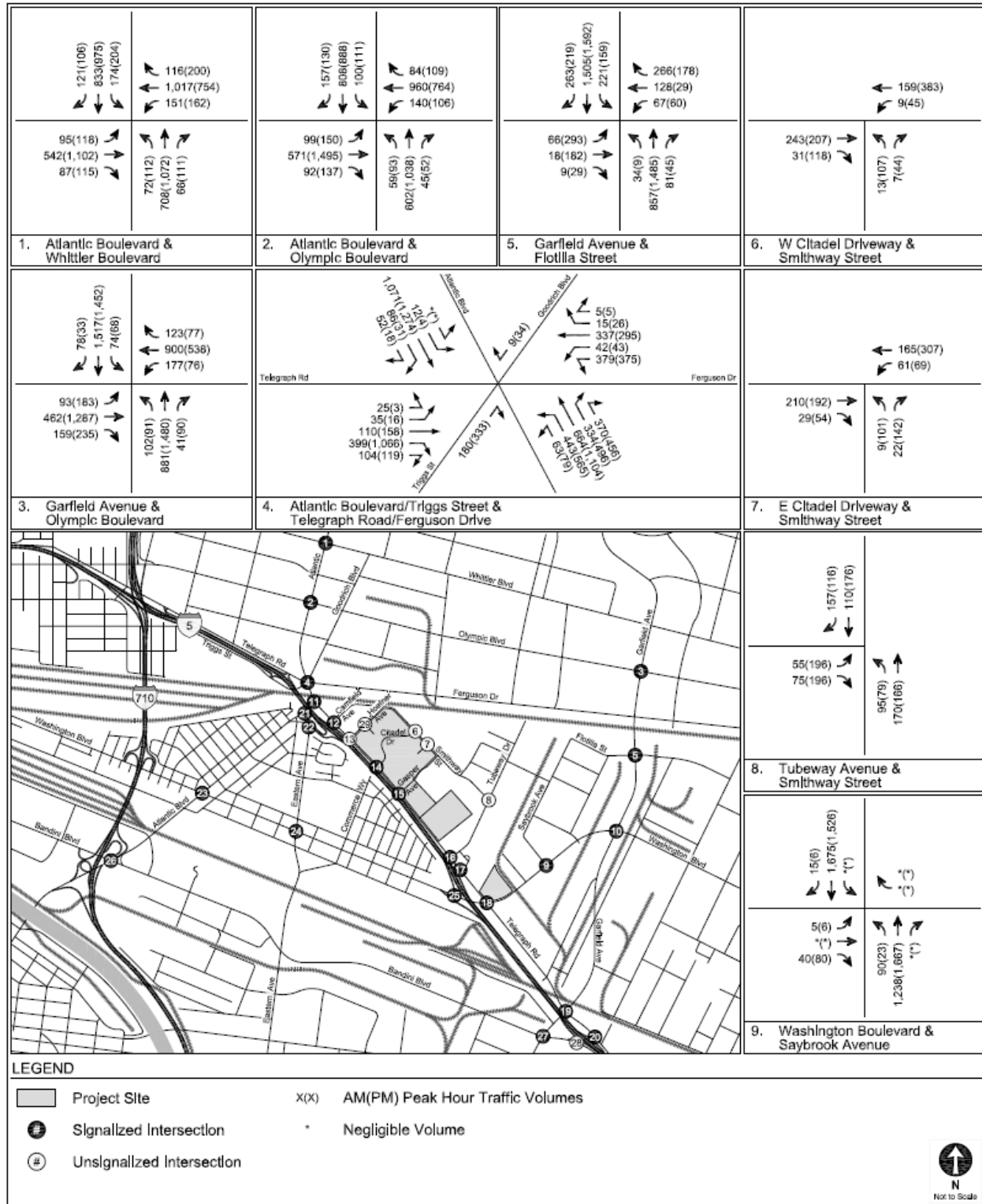


EXHIBIT 3-12A
FUTURE WITH TRUCK TRAFFIC WITH PROJECT CONDITIONS (YEAR 2025) WEEKDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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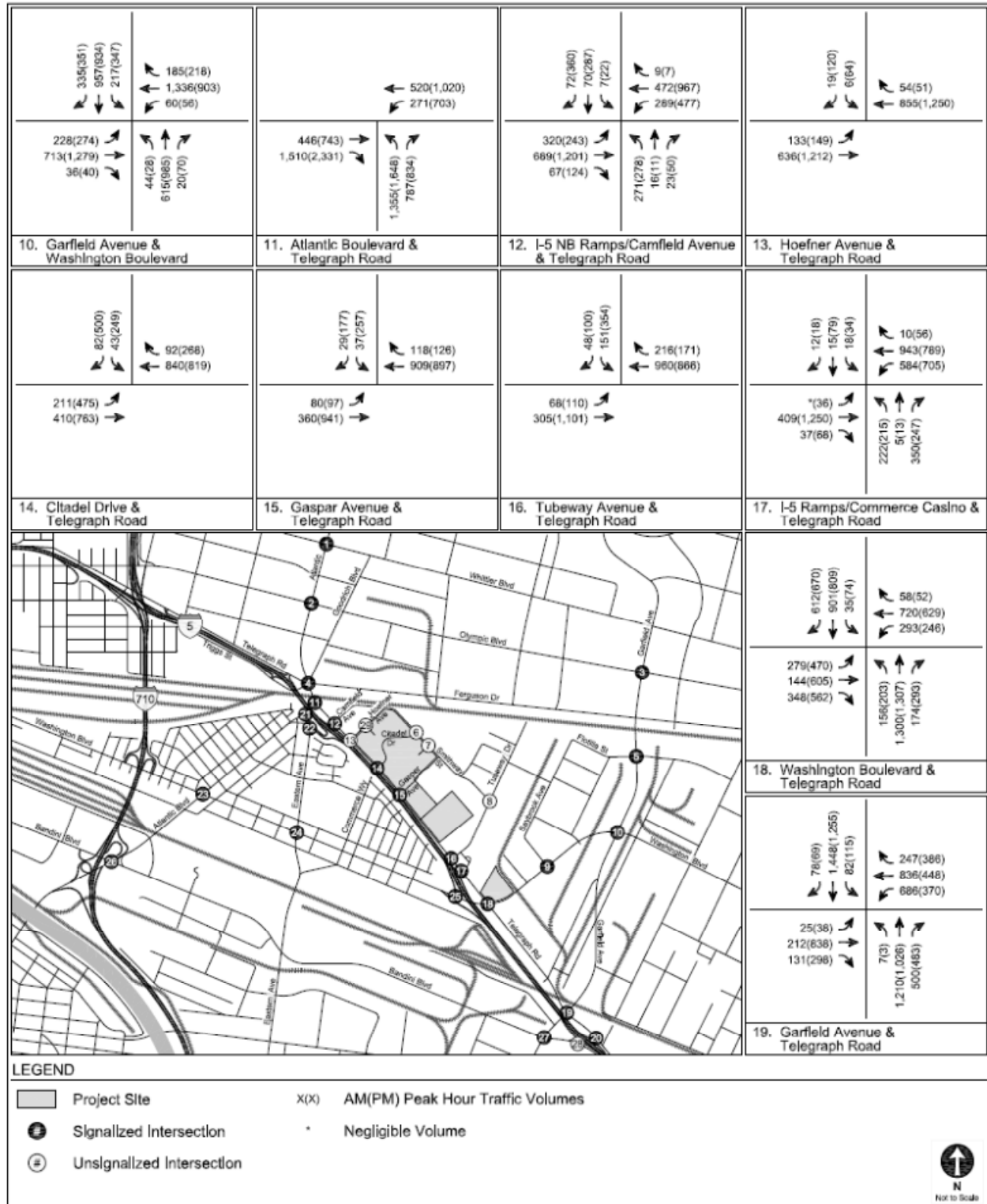


EXHIBIT 3-12B
FUTURE WITH TRUCK TRAFFIC WITH PROJECT CONDITIONS (YEAR 2025) WEEKDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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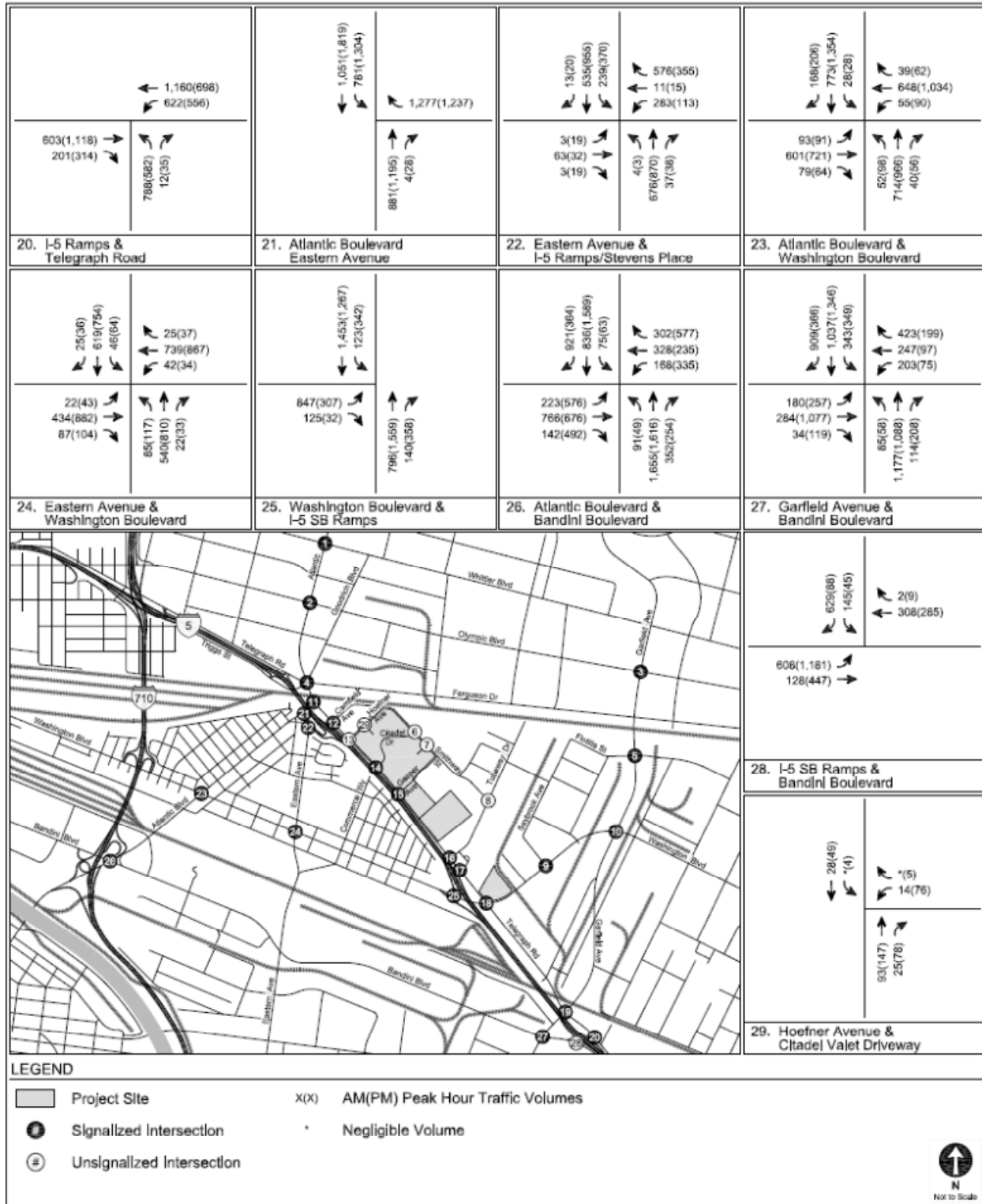


EXHIBIT 3-12C
FUTURE WITH TRUCK TRAFFIC WITH PROJECT CONDITIONS (YEAR 2025) WEEKDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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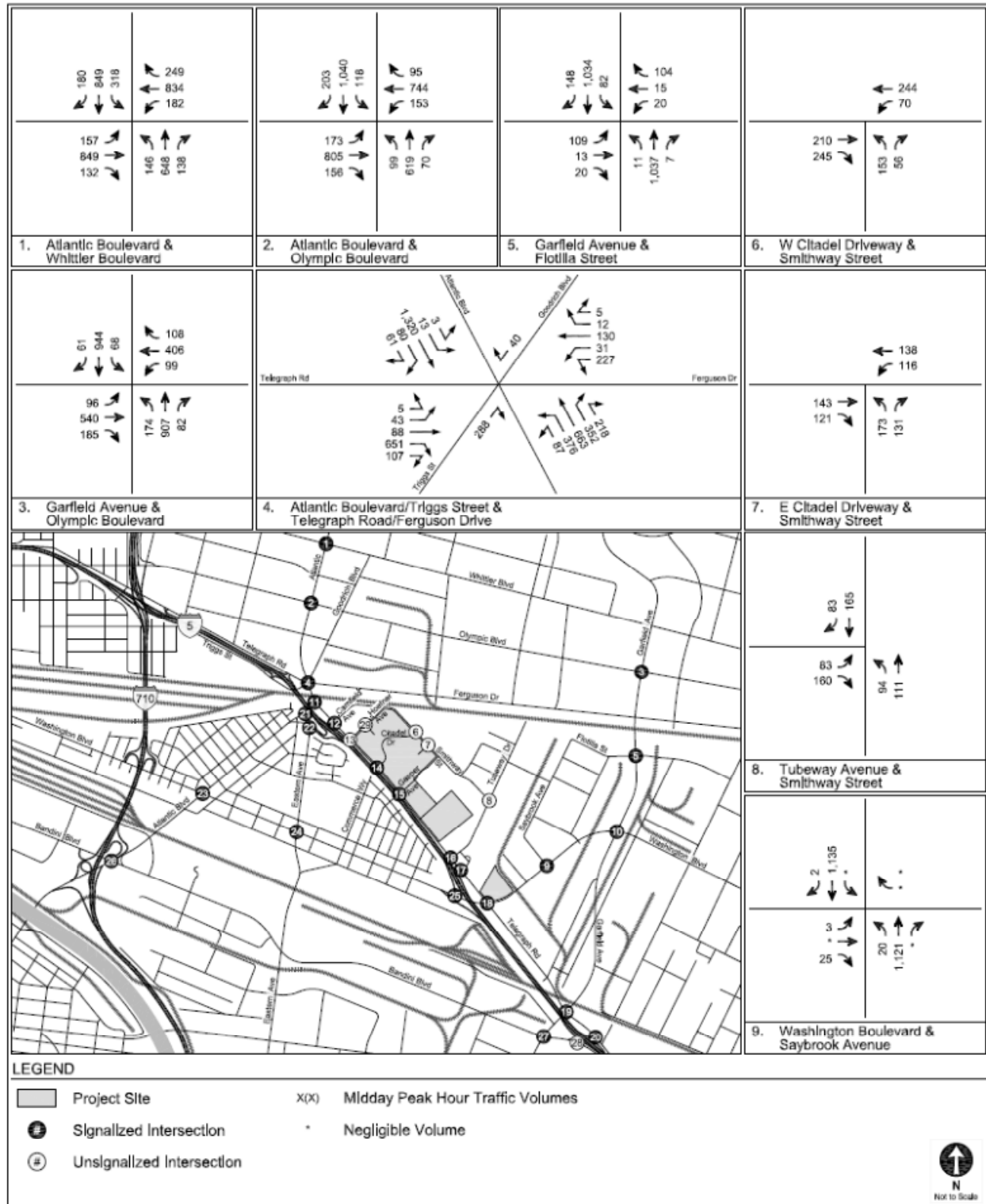


EXHIBIT 3-13A
FUTURE WITH TRUCK TRAFFIC WITH PROJECT CONDITIONS (YEAR
2025) SATURDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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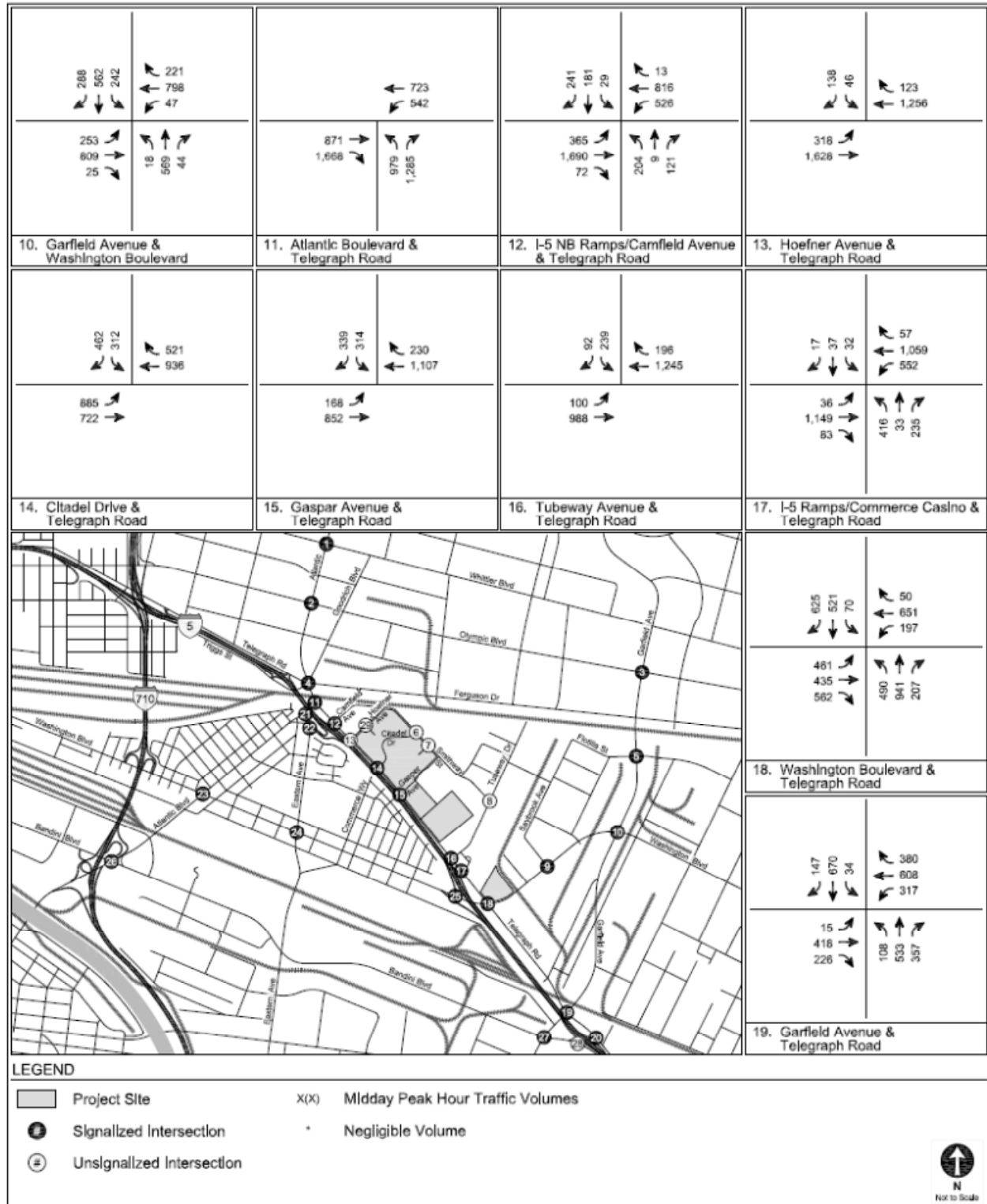


EXHIBIT 3-13B
FUTURE WITH TRUCK TRAFFIC WITH PROJECT CONDITIONS (YEAR 2025) SATURDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

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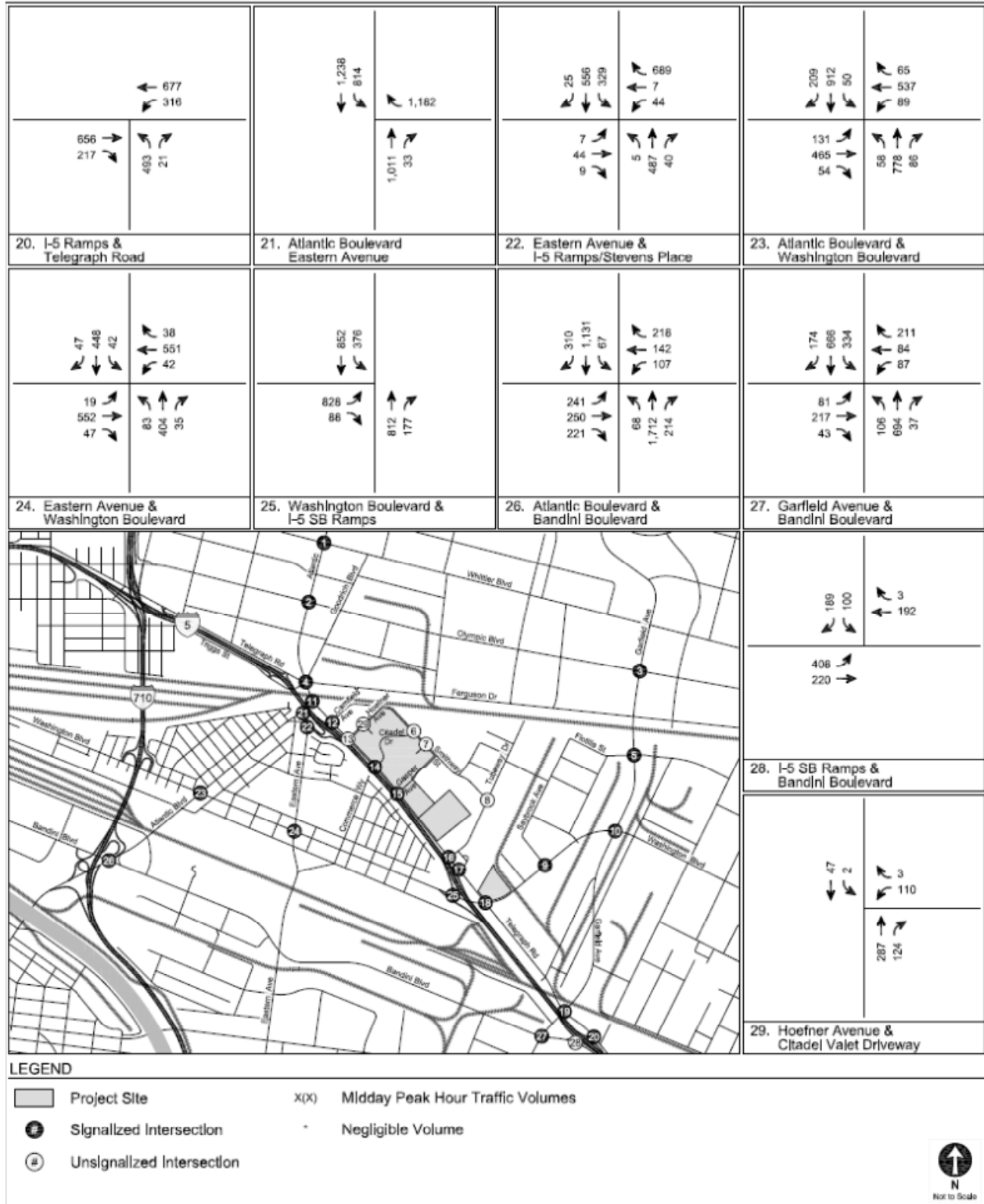


EXHIBIT 3-13C
FUTURE WITH TRUCK TRAFFIC WITH PROJECT CONDITIONS (YEAR 2025) SATURDAY PEAK HOUR TRAFFIC VOLUMES
 Source: Gibson Transportation Consulting, Inc.

Table 3-24
Future with Project Conditions including Truck Traffic (Year 2025)
Signalized and Unsignalized Intersection Peak Hour Level of Service

Intersection	Peak Hour	Future w/o Project		Future with Project Conditions			
		V/C Ratio	LOS	V/C Ratio	LOS	Chg. in V/C	Signif. Impact
1. Atlantic Boulevard and Whittier Boulevard (signalized)	AM	0.826	D	0.828	D	0.002	NO
	PM	1.038	F	1.043	F	0.005	NO
	MD	0.916	E	0.924	E	0.008	NO
2. Atlantic Boulevard and Olympic Boulevard (signalized)	AM	0.823	D	0.827	D	0.004	NO
	PM	1.073	F	1.086	F	0.013	YES
	MD	0.919	E	0.946	E	0.027	YES
3. Garfield Boulevard and Olympic Boulevard (signalized)	AM	1.037	F	1.040	F	0.003	NO
	PM	1.153	F	1.158	F	0.005	NO
	MD	0.805	D	0.812	D	0.007	NO
4. Atlantic Avenue/Triggs Street and Telegraph Road/Ferguson Drive (signalized)	AM	0.891	D	0.907	E	0.016	YES
	PM	1.132	F	1.192	F	0.060	YES
	MD	0.813	D	0.909	E	0.096	YES
5. Garfield Avenue and Flotilla Street (signalized)	AM	0.877	D	0.881	D	0.004	NO
	PM	1.026	F	1.030	F	0.004	NO
	MD	0.606	B	0.610	B	0.004	NO
9. Washington Boulevard and Saybrook Avenue (signalized)	AM	0.526	A	0.533	A	0.007	NO
	PM	0.484	A	0.497	A	0.013	NO
	MD	0.348	A	0.366	A	0.018	NO
10. Garfield Avenue and Washington Boulevard (signalized)	AM	0.885	D	0.894	D	0.009	NO
	PM	1.034	F	1.052	F	0.018	YES
	MD	0.790	C	0.813	D	0.023	YES
11. Atlantic Avenue and Telegraph Road (signalized)	AM	0.839	D	0.878	D	0.039	YES
	PM	1.168	F	1.343	F	0.175	YES
	MD	0.971	E	1.345	F	0.374	YES
12. I-5 Northbound Ramps/Camfield Avenue and Telegraph Road (signalized)	AM	0.562	A	0.606	B	0.044	NO
	PM	0.809	D	0.991	E	0.182	YES
	MD	0.812	D	1.081	F	0.269	YES
14. Citadel Drive and Telegraph Road (signalized)	AM	0.317	A	0.377	A	0.060	NO
	PM	0.397	A	0.592	A	0.195	NO
	MD	0.528	A	0.781	C	0.253	YES
15. Gaspar Avenue and Telegraph Road (signalized)	AM	0.329	A	0.387	A	0.058	NO
	PM	0.368	A	0.535	A	0.167	NO
	MD	0.435	A	0.680	B	0.245	NO

Table 3-24 (continued)
Future with Project Conditions including Truck Traffic (Year 2025)
Signalized and Unsignalized Intersection Peak Hour Level of Service

Intersection	Peak Hour	Future w/o Project		Future with Project Conditions			
		V/C Ratio	LOS	V/C Ratio	LOS	Chg. in V/C	Signif. Impact
16. Tubeway Avenue and Telegraph Road (signalized)	AM	0.420	A	0.458	A	0.038	NO
	PM	0.445	A	0.543	A	0.098	NO
	MD	0.439	A	0.578	A	0.139	NO
17. I-5 North Ramps/Commerce Casino and Telegraph Road (signalized)	AM	0.671	B	0.717	C	0.046	YES
	PM	0.894	D	1.020	F	0.126	YES
	MD	0.828	D	1.017	F	0.189	YES
18. Washington Boulevard and Telegraph Road (signalized)	AM	0.828	D	0.923	E	0.095	YES
	PM	0.931	E	1.022	F	0.091	YES
	MD	0.765	C	0.882	D	0.117	YES
19. Garfield Avenue and Telegraph Road (signalized)	AM	0.869	D	0.877	D	0.008	NO
	PM	0.871	D	0.884	D	0.013	NO
	MD	0.624	B	0.628	B	0.004	NO
20. I-5 Northbound Ramps and Telegraph Road (signalized)	AM	1.004	F	1.018	F	0.014	YES
	PM	1.091	F	1.110	F	0.019	YES
	MD	0.723	C	0.749	C	0.026	NO
21. Eastern Avenue and Atlantic Boulevard (signalized)	AM	0.866	D	0.887	D	0.021	YES
	PM	1.200	F	1.268	F	0.068	YES
	MD	0.876	D	0.979	E	0.103	YES
22. Eastern Avenue and I-5 Ramps/Stevens Place (signalized)	AM	0.523	A	0.537	A	0.014	NO
	PM	0.493	A	0.555	A	0.062	NO
	MD	0.455	A	0.560	A	0.105	NO
23. Atlantic Boulevard and Washington Boulevard (signalized)	AM	0.568	A	0.576	A	0.008	NO
	PM	0.838	D	0.869	D	0.031	YES
	MD	0.587	A	0.628	B	0.041	NO
24. Eastern Avenue and Washington Boulevard (signalized)	AM	0.454	A	0.460	A	0.006	NO
	PM	0.543	A	0.564	A	0.021	NO
	MD	0.375	A	0.406	A	0.031	NO
25. I-5 Southbound Ramps and Washington Boulevard (signalized)	AM	0.678	B	0.720	C	0.042	YES
	PM	0.825	D	0.908	E	0.083	YES
	MD	0.760	C	0.877	D	0.117	YES
26. Atlantic Boulevard and Bandini Boulevard (signalized)	AM	0.788	C	0.792	C	0.004	NO
	PM	0.888	D	0.896	D	0.008	NO
	MD	0.599	A	0.610	B	0.011	NO
27. Garfield Avenue and Bandini Boulevard (signalized)	AM	0.950	E	0.952	E	0.002	NO
	PM	1.054	F	1.079	F	0.025	YES
	MD	0.627	B	0.661	B	0.034	NO

Table 3-24 (continued)
Future with Project Conditions including Truck Traffic (Year 2025)
Signalized Intersection Peak Hour Level of Service

Intersection	Peak Hour	Future w/o Project		Future with Project Conditions			
		V/C Ratio	LOS	V/C Ratio	LOS	Chg. in V/C	Signif. Impact
6. West Citadel Driveway and Smithway Street (unsignalized)	AM	10.30	B	10.80	B	0.50	--
	PM	13.00	B	16.20	C	3.20	--
	MD	13.30	B	20.30	C	7.00	--
7. East Citadel Driveway and Smithway Street (unsignalized)	AM	9.80	A	10.50	B	0.70	--
	PM	12.30	B	14.70	B	2.40	--
	MD	12.70	B	17.50	C	4.80	--
8. Tubeway Avenue and Smithway Street (unsignalized)	AM	11.80	B	12.30	B	0.50	--
	PM	16.10	C	20.20	C	4.10	--
	MD	10.90	B	12.70	B	1.80	--
13. Hoefner Avenue and Telegraph Road (signalized)	AM	A	0.437	A	0.059	NO	--
	PM	A	0.579	A	0.101	NO	--
	MD	A	0.656	B	0.146	NO	--
28. I-5 Southbound Ramps and Bandini Boulevard (unsignalized)	AM	Overflow	F	Overflow	F	N/A	--
	PM	Overflow	F	Overflow	F	N/A	--
	MD	Overflow	F	Overflow	F	N/A	--
29. Hoefner Avenue and Citadel Valet Driveway (unsignalized)	AM	9.10	A	9.20	A	0.10	--
	PM	9.40	A	9.70	A	0.30	--
	MD	10.50	B	10.90	B	0.40	--

Source: Gibson Transportation Consulting, Inc.

The traffic analysis made the following determination with respect to the proposed project's traffic impacts:¹²⁴

- Under *Existing Conditions (Year 2018)*, 15 of the 23 study intersections is anticipated to operate at LOS D or better during the analyzed peak hours under Existing with Project Conditions. Four of the six unsignalized intersections operate at LOS C or better under Existing with Project Conditions.
- Under *Future without Project Conditions (Year 2025)*, 12 of the 23 signalized intersections are anticipated to operate at LOS D or better during the analyzed peak hours under Future with Truck Traffic without Project Conditions.

¹²⁴ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

- Under *Existing with Project Conditions (Year 2018)*, using the City criteria for determining the significance of a traffic impact, the Project would have a significant impact at 15 of the 23 signalized study intersections during the analyzed peak hours under Existing with Project Conditions. These intersections are anticipated to operate at LOS D or better. Of the 23 signalized intersections, the ten signalized intersections are anticipated to result in a significant impact. Four of the six unsignalized intersections operate at LOS C or better under Existing with Project Conditions. The intersection of Hoefner Avenue and Telegraph Road (Intersection #13) meets the minimum peak hour traffic volume threshold of Warrant 3, and the intersection of I-5 Southbound Ramps and Bandini Boulevard (Intersection #28) does not satisfy the signal warrant under Existing with Project Conditions.
- Under *Future with Project Conditions (Year 2025)*, using the City criteria for determining the significance of a traffic impact, 9 of the 23 signalized study intersections are anticipated to operate at LOS D or better. Thirteen signalized intersections are anticipated to result in a significant impact during at least one of the analyzed peak hours.
- The Citadel already participates in a TDM program that involves running its own buses to pick up customers from downtown Los Angeles and area hotels. The project should commit to continuing this program and to developing additional TDM measures that target the overall reduction of trips to/from The Citadel by ten percent. A formal TDM Program would be submitted for the approval of the City Director of Public Works prior to issuance of the Certificate of Occupancy for the retail portion of the project.
- TSM contributions by the project would help pay for traffic signal system enhancements in the study area. The City should consider a program that allows a Traffic Impact Fee to be paid by new development to pay for TSM improvements in the short-term and new access routes to/from the study area in the long-term.
- A project contribution to assist the City's in the implementation of the Bicycle Master Plan could be considered part of a Public Benefits Program for the City.
- The impact at Atlantic Boulevard and Telegraph Road would be fully mitigated by reconstructing the east side of the northbound approach to provide four northbound lanes including two left-turn lanes, one shared left/right-turn lane and one right-turn lane.
- The impact at I-5 Northbound Off-Ramps/Camfield Avenue and Telegraph Road could be mitigated and reduced to less than significant levels by widening and restriping Telegraph Road to provide an additional eastbound through lane. This improvement cannot be completed under the existing right-of-way and would require additional widening. The resulting eastbound approach would consist of one left-turn lane, two through lanes, and one shared through/right-turn lane. Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant.

- The impact at Washington Boulevard & Telegraph Road could be mitigated and reduced to less than significant levels by widening and restriping Washington Boulevard to provide an exclusive northbound right-turn lane onto Telegraph Road. This improvement cannot be completed under the existing right-of-way and would require additional widening along the east side of Washington Boulevard, south of Telegraph Road. The resulting northbound approach would consist of two left-turn lanes, two through lanes and one right-turn lane. Should this improvement be determined to be infeasible during the design process, the impact at the intersection would remain and be considered significant and unavoidable.
- With the TDM, TSM, and physical improvement mitigation program, the project would not cause any neighborhood intrusion impact.
- Analysis of potential impacts on the regional transportation system conducted in accordance with CMP requirements determined that the project would not have a significant impact on the regional arterial or freeway system.
- Caltrans will likely look for a fair share payment for I-5 freeway improvements based on the Project's addition of traffic to long-range conditions.
- An analysis of the parking supply indicates that the proposed parking supply for the project would meet Code requirements.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The Project is expected to result in significant traffic impacts in the Future with Project Conditions, before mitigation, at the following 12 signalized intersections:¹²⁵

2. Atlantic Boulevard & Olympic Boulevard
4. Atlantic Boulevard/Triggs Street & Telegraph Road/Ferguson Drive
10. Garfield Avenue & Washington Boulevard
11. Atlantic Boulevard & Telegraph Road
12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road
14. Citadel Drive & Telegraph Road
17. I-5 Ramps/Commerce Casino & Telegraph Road
18. Washington Boulevard & Telegraph Road
20. I-5 Northbound Ramps & Telegraph Road
21. Eastern Avenue & Atlantic Boulevard
25. I-5 Southbound Ramps & Washington Boulevard
27. Garfield Avenue & Bandini Boulevard

¹²⁵ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

With the addition of truck traffic volumes, the project is expected to result in significant traffic impacts at one additional intersection at Atlantic Boulevard & Washington Boulevard (Intersection #23) under Future with Truck Traffic with Project Conditions.

MITIGATION OF POTENTIAL IMPACTS

The mitigation measures described in this section relate to the significant traffic impacts previously described with respect to the Existing with Project Conditions (Year 2018), Future with Project Conditions (Year 2025), and Future with Truck Traffic with Project Conditions (Year 2025) analyses. As described, under *Existing with Project Conditions*, before mitigation, the project is expected to result in significant traffic impacts at the following ten signalized intersections:

- 2. Atlantic Boulevard & Olympic Boulevard
- 4. Atlantic Boulevard/Triggs Street & Telegraph Road/Ferguson Drive
- 11. Atlantic Boulevard & Telegraph Road
- 12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road
- 14. Citadel Drive & Telegraph Road
- 17. I-5 Ramps/Commerce Casino & Telegraph Road
- 18. Washington Boulevard & Telegraph Road
- 21. Eastern Avenue & Atlantic Boulevard
- 25. I-5 Southbound Ramps & Washington Boulevard
- 27. Garfield Avenue & Bandini Boulevard

The mitigation program for the project includes the following major components:

- Implementation of a *Transportation Demand Management (TDM)* program for the project site to promote peak period trip reduction.
- *Transportation Systems Management (TSM)* improvements, including signal system coordination, signal controller updates and installation of closed circuit television (CCTV) at key intersections within the study area.
- *Specific intersection improvements*, including physical mitigations and signal phasing enhancements. These mitigation measures are consistent with the City's policies and procedures that support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and promote other modes of travel.¹²⁶

TDM Program

The TDM program outlined below details a set of strategies proposed for the project designed to reduce peak hour vehicular traffic to and from the project site. It is a comprehensive program of design features,

¹²⁶ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

transportation services, education programs, and incentive programs intended to reduce the impact of traffic from employees and visitors to the project site during the most congested time periods of the day. The Citadel already manages a TDM program that is aimed at bringing customers to the site via buses that serve downtown Los Angeles and area hotels to carry customers to shopping and meals on the site. The project should expand this TDM program to further promote non-automobile travel and reduce the use of single-occupant vehicle trips. The strategies in the TDM program, subject to review and approval by the City, could include, but are not necessarily limited to, the following:

- *Transportation Information Center.* A Transportation Information Center is a centrally located commuter information center where project employees, tenants, and patrons can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center would support orientation for new employees and provide information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.
- *Educational Programs.* A key component of a successful TDM program is to make employers and employees at the project site aware of the various programs offered. To this end, a transportation management coordinator (TMC) on the building management staff could reach out both to employers and employees directly to promote the benefits of TDM. In addition to the various TDM programs described below, the TMC could reach out to employers to promote flexible or alternative work schedules and telecommuting options with statistics and examples of businesses that have successfully implemented such programs. These programs have the ability to reduce peak hour trip generation by allowing employees to arrive for and leave from work outside of the typical morning and afternoon peak commuting hours.
- *Project Design Features to Promote Bicycling and Walking.* A significant and growing number of people in the City prefer to ride bicycles or walk to their employment given sufficient facilities to make the commute feel safe and convenient. The project could incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, or a bicycle sharing or rental program. Additionally, the project site could be designed to be a friendly and convenient environment for pedestrians. As part of an overall Public Benefits Program, the project could contribute a one-time fixed fee to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the area.
- *Online Ridematching and Carpool/Vanpool Program.* The TMC could provide a ridematching service to match interested employees with carpools and vanpools. Carpools/vanpools provide the potential for employees to come to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the Planning Area.
- *Guaranteed Ride Home (GRH).* A GRH program assures transportation service to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns regarding alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. A GRH program would cover all employees participating in

the carpool/vanpool program or using transit to and from the Planning Area in the event of personal or family emergencies. The individual would be reimbursed for a taxi ride, shared car service, or short-term car rental. Typically, this GRH benefit is limited to two-three times per year per employee to avoid abuses of the benefit. A support service such as GRH is an important part of TDM implementation that assures an individual he or she will not be dependent on a ridesharing or transit schedule in the event of an emergency.

- *Short-Term Car Rentals.* The project could partner with short-term car rental services such as Zip-Car or Car-to-Go, which would provide vehicles available to users for hourly rentals at strategic locations within the City area. Similar to the GRH program, this service offers assurance to users of alternative modes of transit that they have options should the need arise to leave at an unscheduled time. Short-term car rentals could be used to travel to business meetings, lunch, or in emergencies, and could provide the source of emergency transportation for those using the GRH program.
- *Incentives for Using Alternative Travel Modes.* The project TMC could incorporate various incentives for use of its programs. For example, eligible employees could be provided with discounted monthly transit passes for Metro rail and bus service. Carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Those who choose not to drive their own cars and park them at the project site could receive a “parking cash-out” subsidy.
- *Mobility Hub Support.* The project could support efforts to provide first-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, provide amenities such as bicycle parking and rentals, shared vehicle rentals (e.g., Zip-Car), and transit information. The project could provide space for similar amenities at the project site to complement future mobility hubs in the Study Area.

Project Trip Reduction from the TDM Program.

The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.) *Trip Generation Handbook, 3rd Edition* (ITE, 2017) provides a summary of research of TDM programs at different employers. At places that had the most comprehensive programs, including both economic incentives (e.g., transit passes) and support services, the programs resulted in an average 24% reduction in commuter vehicles. Thus, as an achievable but conservative estimate, an overall TDM trip reduction credit of ten percent was assumed on the retail portion of the project.¹²⁷

¹²⁷ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

- The TDM program is expected to result in a reduction of 2,395 weekday daily trips, including 46 trips during the morning peak hour and 253 trips during the afternoon peak hour, and 3,442 Saturday daily trips, including 358 trips during the midday peak hour.
- The Area 1 and Area 2 portion of the project, when fully built and occupied and with implementation of the TDM program, would generate a total of 9,675 weekday daily trips, including 296 trips during the morning peak hour (189 inbound, 107 outbound) and 1,041 trips during the afternoon peak hour (511 inbound, 530 outbound) and 12,961 Saturday daily trips, including 1,574 trips during the midday peak hour (825 inbound, 749 outbound).
- The trip generation estimates for the Area 2 portion of the Planning Area would remain the same.

The total trip generation estimates with peak hour trip reductions from the TDM program on The Citadel site and the trip generation estimates on the 10-Acre parcel were assigned through the study intersections using the trip distribution patterns illustrated in Figures 14A and 14B included in the Traffic Study. The Project-only morning and afternoon peak hours and Saturday midday peak hour traffic volumes, after implementation of the TDM program as part of the project's mitigation, are shown in Figures 23 and 24, respectively, included in the Traffic Study.

TSM Improvements

Modern, coordinated, and integrated traffic signal systems in other Southern California cities have been shown to increase the efficiency of traffic signals and result in capacity increases of 7 to 20% along coordinated corridors. To be conservative, the City has determined that TSM improvements could improve traffic operations and increase intersection capacity by approximately seven percent along a corridor. While the ultimate goal of an integrated traffic signal system would be a citywide signal synchronization system, this set of recommendations focuses on the traffic signals in the study area boundaries and along the key corridors serving the study area. Potential TSM improvements include the following:¹²⁸

- *Signal Controller Upgrades.* Many study intersections within the City currently operate with the Type 170 signal controller while newer controllers (Type 2070) provide for enhanced and real-time operation of traffic signal timing. The City recommends traffic signal controller upgrades to a Type 2070 Controller, as well as 322 cabinets to replace the existing aging cabinets. These improvements would provide system-wide benefits.
- *CCTV Cameras.* The potential TSM improvements include funding for the installation of CCTV cameras and the necessary infrastructure (including fiber optic and interconnect tubes). An integral part of the real-time operation of the traffic signal timings, the strategic placement of CCTV cameras at key intersections provides the City with the ability to monitor traffic operations and respond instantly to incidents that delay vehicles and transit service.

¹²⁸ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

- *System Loops.* The potential TSM improvements include funding the installation of system loops at signalized intersections within the identified corridors. A system loop is an advance detector loop that is embedded in the street pavement. These loops identify traffic volume and lane occupancy and are used to determine the appropriate signal timing parameters. These loops give the City the ability to extend the green time for an approach so that groups of vehicles generally do not have to stop when travelling along synchronized-signal corridors. They are located at an appropriate distance from the intersection so that a vehicle just upstream of the loop can comfortably decelerate to a stop when the yellow signal is displayed.

Potential Physical Improvement Measures

The following is a description of the feasible proposed intersection mitigation measures:¹²⁹

- *Intersection 11. Atlantic Boulevard & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Atlantic Boulevard to provide an exclusive northbound right-turn lane. The resulting northbound approach would consist of two left-turn lanes, one shared left/right-turn lane, and one right-turn lane. This improvement could be accommodated within the existing right-of-way since the City owns the land on the east side of Atlantic Boulevard north of the freeway overpass. The improvement would require widening and reconstruction along the east side of the northbound leg from the north end of the bridge over I-5 to Telegraph Road. Due to the geometric limitations and the financial infeasibility of widening the bridge over I-5, the resulting northbound right-turn lane would be approximately 100 feet long, but it would provide some relief to intersection operations. *Should this improvement be determined infeasible during the design process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.
- *Intersection 12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Telegraph Road to provide an additional eastbound through lane. This improvement cannot be completed under the existing right-of-way and would require additional widening. The resulting eastbound approach would consist of one left-turn lane, two through lanes, and one shared through/right-turn lane. *Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of

¹²⁹ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.

- *Intersection 17. I-5 Ramps/Commerce Casino & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Telegraph Road to provide an additional westbound left-turn lane to the I-5 Northbound On-Ramp. This improvement cannot be completed under the existing right-of-way and would require additional widening along the north side of Telegraph Road. The resulting westbound approach would consist of two left-turn lanes, two through lanes and one through/right-turn lane. In order to accept the dual left-turn lanes, the freeway on-ramp would also have to be widened and ramp meters would have to be installed to meter the traffic onto the freeway. This intersection improvement would have to be approved by both the City and by Caltrans. *Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.

Under Future with Truck Traffic with Project Conditions (Year 2025), additional physical improvement measures are required at the following intersection:¹³⁰

- *Intersection 18. Washington Boulevard & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Washington Boulevard to provide an exclusive northbound right-turn lane onto Telegraph Road. This improvement cannot be completed under the existing right-of-way and would require additional widening along the east side of Washington Boulevard, south of Telegraph Road. The resulting northbound approach would consist of two left-turn lanes, two through lanes and one right-turn lane. *Should this improvement be determined to be infeasible during the design process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The components of the project's mitigation program described in the previous section would result in peak hour trip reductions from the implementation of the TDM program, as well as operational improvements as a result of the TSM improvements and specific intersection improvements. As discussed previously, if the specific physical intersection improvements are determined to be infeasible during the design process, the following three study intersections would be significantly impacted after mitigation:

¹³⁰ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

11. Atlantic Boulevard & Telegraph Road;
12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road; and,
17. I-5 Ramps/Commerce Casino & Telegraph Road.¹³¹

When considering *Future with Truck Traffic with Project* if the specific intersection improvements are determined to be infeasible during the design process, the following four study intersections would remain significantly impacted after mitigation:

11. Atlantic Boulevard & Telegraph Road;
12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road;
17. I-5 Ramps/Commerce Casino & Telegraph Road; and,
18. Washington Boulevard & Telegraph Road.¹³²

3.11.4.2 THE PROPOSED PROJECT'S POTENTIAL FOR EXCEEDING, CONFLICTING WITH AN APPLICABLE CONGESTIONS MANAGEMENT PROGRAM, INCLUDING, BUT NOT LIMITED TO, LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY A COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS.

DISCUSSION OF IMPACT ANALYSIS

The CMP guidelines for determining the study area for CMP arterial monitoring intersections and freeway monitoring locations are as follows:

- All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the morning or afternoon weekday peak hours of adjacent street traffic.
- All CMP mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the morning or afternoon weekday peak hours.

The CMP identifies two CMP arterial monitoring intersections within the Project Study Area:

- Atlantic Boulevard & Whittier Boulevard (1.0 mile northwest of the project site)
- Garfield Boulevard & Whittier Boulevard (1.50 miles northeast of the project site)

Based on the incremental project trip generation and distribution described previously, the project will not add 50 or more new trips to any of the arterial monitoring intersections during any analyzed peak hours.

¹³¹ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

¹³² Ibid.

According to the CMP traffic impact criteria, the project traffic would not cause a significant impact at these intersections and no further analysis is required.¹³³

The nearest mainline freeway monitoring location to the project site is I-5 at Ferris Avenue, approximately one mile northwest of the project site. Based on the incremental project trip generation estimates, the project will add 65 northbound trips and 123 southbound trips in the morning peak hour, 248 northbound trips and 222 southbound trips in the afternoon peak hour, and 231 northbound trips and 249 southbound trips in the Saturday midday peak hour. The project will add 150 or more new trips per hour to this location in at least one direction during at least one analyzed peak hours.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse CMP impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant CMP impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse CMP impacts.

3.11.4.3 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN THE LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS.

DISCUSSION OF IMPACT ANALYSIS

The project site is not located within two miles of an operational public airport. The nearest airport is Compton-Woodley Airport, a general aviation airport located 12 miles to the southwest. The Long Beach airport is located approximately 14 miles to the southeast. Los Angeles International Airport (LAX) is located approximately 21 miles to the southwest. As a result, the proposed project will not present a safety hazard related to aircraft or airport operations at a public use airport and no impacts will occur.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts on air traffic patterns.

¹³³ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project, Commerce, California*. January 2019.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in any impact on air traffic patterns.

3.11.4.4 THE PROPOSED PROJECT'S POTENTIAL FOR SUBSTANTIALLY INCREASING HAZARDS DUE TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT).

DISCUSSION OF IMPACT ANALYSIS

Access and Circulation

Vehicular access to Area 1 and Area 2 would be provided via two signalized and two unsignalized driveways along Telegraph Road, one unsignalized driveway along Hoefner Avenue, and two unsignalized driveways provided along Smithway Street. Vehicular access to Area 3 would be provided via one new full-access driveway along Washington Boulevard and one new right-turn in/out driveway along Telegraph Road. Five primary access points to Area 1 and Area 2 were analyzed as study intersections. The analysis detailed previously showed that all five primary access points to The Citadel are anticipated to operate at LOS C or better under Future with Project Conditions. The access system is adequate to serve the anticipated project traffic levels.¹³⁴

Parking

For the purposes of the parking analysis, the total existing and proposed uses within the Planning Area were analyzed based on the City Code requirements. A total of 4,736 spaces would be required to accommodate the parking requirements for the proposed Project. The project would provide a total of 5,538 spaces, 802 more spaces than required by Code. A total of 462 spaces would be required to accommodate the parking requirements of the 10-Acre parcel. The Project would provide a total of 2,318 spaces within the parking structures alone.

Bicycle Racks

Bicycle racks or other secure bicycle parking shall be provided to accommodate four bicycles per the first 50,000 square feet of nonresidential development and one bicycle per each additional 50,000 square feet of nonresidential development. Calculations that result in a fraction of 0.5 or higher shall be rounded up to the nearest whole number. A bicycle parking facility may also be a fully enclosed space or locker accessible only to the owner or operator of the bicycle that protects the bicycle from inclement weather.

¹³⁴ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

Specific facilities and location (e.g., provision of racks, lockers, or locker room) shall be provided to the satisfaction of the City. Based on the Code, the Project is required to provide 18 bicycle spaces in Area 1 and Area 2 and four bicycle spaces in Area 3.¹³⁵

Freeway Ramp Queuing Impacts

Five off-ramps from the I-5 Freeway and one off-ramp from I-710 Freeway were analyzed to determine whether the lengths of the ramps are sufficient to accommodate vehicle queue lengths. The queue lengths were estimated using Vistro, which reports the 95th percentile queue length, in feet, for each approach lane on the off-ramp. Caltrans' primary concern is that queued vehicles do not extend past the back of an off-ramp onto the mainline. To this end, the queuing analysis looked at two separate components of ramp capacity: the length of each approach lane to the intersection at the end of the off-ramp and the total length of the ramp, behind any approach lane delineation lines, to the gore point where the ramp diverges from the freeway mainline. The queue may exceed the striped length of a given approach lane as long as there is sufficient additional queuing capacity on the ramp, so that any queue will not spill over onto the mainline. The Traffic Study indicated that the queue lengths at all six off-ramps would not exceed the capacity of the approach lanes or the ramps, with or without project traffic, for Year 2025. However, there ramps will exceed capacity under Year 2040.

Traffic Diversion

Traffic diversion occurs when traffic leaves the arterial and collector street system and instead uses local residential streets to complete trips. Most often, this diversion occurs because motorists believe that they can reduce their travel times by taking a "short-cut" through the neighborhood. Neighborhood diversion is usually a result of one of two conditions. First, the access for a new or existing development may line up directly opposite a residential street, thus encouraging the use of the residential street for access to/from the development. Second, a development may add enough traffic to the arterial street system that some of the key intersections along that arterial street become congested and traffic diverts to parallel residential streets to avoid the new congestion points. In the case of the project, neither of these conditions is projected to occur and, therefore, diversion to residential streets is not anticipated. The Citadel does not currently cause its own traffic or through traffic to divert to residential streets and this is not expected to change despite the increase in traffic generated by the project.¹³⁶

¹³⁵ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

¹³⁶ Ibid.

The I-5 Freeway forms a barrier between the Planning Area and residential streets, with access limited to the arterial and collector streets of Telegraph Road and Smithway Street. On the other sides of the project, there are non-residential uses across from access points. In terms of the potential for diversion due to increased congestion, the addition of traffic from the project does create significant impacts on key intersections along the arterial routes serving the project. However, these arterial streets are generally not paralleled by a residential street that would be used as a parallel short-cut route and, therefore, the likelihood of neighborhood cut-through is reduced. Thus, no traffic increase on residential streets is expected upon completion of the project.¹³⁷

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts related to the generation of potential traffic hazards.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant traffic hazard impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts related to the generation of potential traffic hazards.

3.11.4.5 THE PROPOSED PROJECT'S POTENTIAL FOR CONFLICTING WITH ADOPTED POLICIES, PLANS, OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES.

DISCUSSION OF IMPACT ANALYSIS

The Citadel currently participates in a TDM program that involves running its own buses to pick up customers from downtown Los Angeles and area hotels. The project would commit to continuing this program and to developing additional TDM measures that target the overall reduction of trips to/from The Citadel by ten percent. A formal TDM Program would be submitted for the approval of the City Director of Public Works prior to issuance of the Certificate of Occupancy for the retail portion of the project.

¹³⁷ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

TSM contributions by the project would help pay for traffic signal system enhancements in the study area. The City should consider a program that allows a Traffic Impact Fee to be paid by new development to pay for TSM improvements in the short-term and new access routes to/from the study area in the long-term. A project contribution to assist the City in the implementation of the Bicycle Master Plan could be considered part of a Public Benefits Program for the City. With implementation of the full mitigation program, including TDM program, TSM program, and physical improvements at the three study intersections, the project is not anticipated to result in significant impacts at any of the 23 signalized study intersections. In addition, the project is not anticipated to result in any neighborhood intrusion impacts.¹³⁸

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts on regarding public transit, bicycle, or pedestrian facilities.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis indicated the proposed project would not result in any significant adverse impacts on regarding public transit, bicycle, or pedestrian facilities.

¹³⁸ Gibson Transportation Consulting, Inc. *Transportation Impact Analysis [TIA] for the Citadel Expansion Project. Commerce, California.* January 2019.

3.12 UTILITIES IMPACTS

This section describes the setting and potential effects associated with the proposed project's implementation on utilities. The analysis focuses on water service, sewer service, and solid waste.

3.12.1 SCOPE OF ANALYSIS

The City of Commerce in its capacity as Lead Agency in the review of the proposed project, directed the preparation of an Initial Study to determine the nature and scope of the analysis that would be required as part of this EIR's preparation. The preliminary environmental analysis indicated the EIR should evaluate the following:

- The proposed project's potential for exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- The proposed project's potential for requiring the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts;
- The proposed project's potential for requiring the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- The proposed project's potential for resulting insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.
- The proposed project's potential for resulting in an overcapacity of the storm drain system, causing area flooding;
- The proposed project's potential for resulting in a determination by the wastewater treatment provider that serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments; or
- The proposed project's potential for utilizing a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- The proposed project's potential for non-compliance with Federal, State, and local statutes and regulations related to solid waste.

3.12.2 ENVIRONMENTAL SETTING

Regulatory Setting - State Requirements

There are a number of existing regulations that will be applicable to any new development and these policies and regulations will be effective in further reducing potential land use impacts. These regulations

are considered to be standard conditions in that they are required regardless of whether an impact requires mitigation. Those regulations that will serve as standard conditions for the proposed future development are described in this section.

- *California Administrative Code.* The California Administrative Code (CAC) establishes efficiency standards for reducing water usage in new water fixtures. Title 24 of the CAC, Section 25352 addresses pipe insulation requirements. Title 20 of the CAC, Section 1604 provides efficiency standards for water fixtures including lavatory faucets, showerheads, and sink faucets.
- *California Urban Water Management Planning Act.* Section 10610 of the California Water Code establishes the Urban Water Management Planning Act. The Act states that every urban water service provider that serves 3,000 or more customers or that supplies over 3,000 acre feet (af) of water annually should prepare an Urban Water Management Plan (UWMP) every five years. The goal of a UWMP is to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years.
- *State Legislation - SB 610 (Costa) and SB 221 (Kuehl).* To further support and augment the Urban Water Management Planning Act, the State legislature enacted Senate Bill (SB) 610 (Costa) and SB 221 (Kuehl). SB 610 amended the California Water Code, requiring that a water service provider prepare a Water Supply Assessment (WSA) to determine whether a project's water demand has been accounted for in the most recent UWMP. If the project's water demand has not been accounted for in the UWMP, the WSA must discuss whether the water service provider's total water supplies would be adequate to meet the projected water demand during normal, single dry, and multiple dry water years during a 20-year period. Additionally, under SB 610, the WSA must be incorporated within an environmental document prepared for the project pursuant to CEQA. Under SB 610, a project that is subject to a WSA includes a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space, or a project that would increase the number of the public water system's existing service connections by 10 percent. SB 221 amended the Subdivision Map Act to require an applicant of a new subdivision project to obtain written verification from the water service provider that sufficient water supplies are, or will be, available to serve the project. In accordance with the requirements of SB 610 and SB 221, a WSA was prepared by for the proposed project.
- *California Integrated Waste Management Board.* The California Integrated Waste Management Board (CIWMB) requires the City of Commerce to comply with the California Integrated Waste Management Act of 1989. This act requires each California city and county to divert 50 percent of its solid waste through source reduction, recycling, and composting. This ordinance requires recycling collection and loading areas in all development projects. The requirements now call for a waste diversion rate of 75% by the year 2020.

Regulatory Setting – City of Commerce

The *City of Commerce General Plan* also includes goals and policies related to utilities and service systems for areas within the City of Commerce and its designated Sphere of Influence. The following City of Commerce General Plan policies for utilities and service systems are relevant to the proposed project:

- *Resource Management [Element] Policy 1.1.* The City of Commerce will do its part in the conservation and protection of air, water, energy, and land in the Southern California region.
- *Resource Management [Element] Policy 1.2.* The City of Commerce will cooperate, to the degree necessary, with federal, state, and county agencies, and surrounding cities, in the maintenance and improvement in the quality of local groundwater.
- *Resource Management [Element] Policy 1.3.* The City of Commerce will work with the Los Angeles County Sanitation District and other government agencies to ensure that the Commerce Refuse to Energy plant operates in a manner that protects the region's air resources.
- *Resource Management [Element] Policy 1.4.* The City of Commerce will encourage the conservation of water resources in residential, commercial, and industrial developments through the use of drought-tolerant plant materials and watersaving irrigation systems.
- *Resource Management [Element] Policy 1.5.* The City of Commerce will encourage the development of appropriate federal, state, county, and local water conservation measures in order to assure future supplies for residents.
- *Resource Management [Element] Policy 3.2.* The City of Commerce will encourage public employees to follow energy conservation procedures designed to reduce energy consumption.

Existing Utilities -Water

The California Water Service Company (Cal Water) provides potable water service to 90 percent of the City of Commerce, including the Planning Area. The City of Commerce is located within Cal Water's East Los Angeles District, which encompasses all or portions of Commerce, East Los Angeles, Montebello, Monterey Park, and Vernon. Cal Water uses a combination of local groundwater and purchased water from the Metropolitan Water District of Southern California (MWD), which is imported from the Colorado River and the State Water Project in northern California. The City of Commerce water system includes three active wells, 12 booster pumps, five storage tanks, and one MWD connection.¹³⁹

Cal Water's *Allowed Pumping Allocation* of 11,774 acre-feet/year is set at 80 percent of the adjudicated right, which is based on the safe yield of the groundwater basin. This is normally referred to as the Allowed Pumping Allocation (APA). However, Cal Water does not currently have the ability to produce and deliver this quantity and normally produces between 3,000 and 6,000 acre feet/year of groundwater. The

¹³⁹ [CalWater] District Information. Website accessed January 15, 2019. <https://www.calwater.com>

remaining groundwater is either sold to other entities or left for basin recharge. A portion, up to 20 percent of the unused APA can also be carried over into the following year. A total of 7,000 acre-feet were leased in the East Los Angeles District through 2010. When Cal Water begins producing its full adjudicated right, these leases will not be required. The East Los Angeles District also has 2,697 acre-feet of previously stored water in a special drought carryover groundwater bank. This supply can be accessed for one-time use or sale and will not be available again. The banked water will most likely be saved until a drought when surface water supplies are reduced.

Existing Utilities –Waste-water

Los Angeles County Sanitation District (LACSD) No. 2 provides sewer collection and treatment to the City of Commerce. LACSD No. 2 is part of the larger Sanitation Districts of Los Angeles County oversees 23 independent special districts that provide wastewater treatment and disposal, and solid waste disposal to a combined service area of 815 square miles and approximately 5.4 million residents. LACSD No. 2 encompasses all or portions of Commerce, Bell, Bell Gardens, Bellflower, Cerritos, Downey, East Los Angeles, Monterey Park, Montebello, Pico Rivera, South Gate, Vernon, and Whittier. Los Coyotes Water Reclamation Plant.¹⁴⁰

The City of Commerce and LACSD No. 2 discharges effluent to the Los Coyotes Water Reclamation Plant in Cerritos. The Los Coyotes Water Reclamation Plant provides primary, secondary, and tertiary treatment capacity for 37 million gallons of wastewater per day. The plant treats an average of 32 million gallons of effluent per day. Of this total effluent, more than 5 million gallons per day of the reclaimed water is reused (reused water is uses for landscape irrigation of schools, golf courses, parks, nurseries, and greenbelts, and industrial use at local companies for carpet dyeing and concrete mixing. The remainder of the effluent is discharged to the San Gabriel River.¹⁴¹

Existing Utilities –Solid Waste

The Sanitation Districts operate a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. Trash collection for commercial land uses is provided by the other private haulers for disposal into the Commerce Incinerator and into area landfills. Waste may also be transferred to either the Mesquite Regional Landfill in Imperial County or to the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF). The Los Angeles County Sanitation District 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. Cal-Met provides franchise trash collection service to business customers in the City of Commerce. Three of the facilities are landfills; the other is a refuse-to-energy facility (i.e., incinerator).

¹⁴⁰ Los Angeles County Sanitation District No. 2. Website accessed January 25, 2019. https://www.lacsd.org/aboutus/more_about_us/.

¹⁴¹ Ibid.

3.12.3 THRESHOLDS OF SIGNIFICANCE

According to the City of Commerce, acting as Lead Agency, a project will normally have a significant adverse impact if it results in any of the following:

- The proposed project's potential for exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- The proposed project's potential for requiring the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts;
- The proposed project's potential for requiring the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- The proposed project's potential for resulting insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.
- The proposed project's potential for resulting in an overcapacity of the storm drain system, causing area flooding;
- The proposed project's potential for resulting in a determination by the wastewater treatment provider that serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments; or
- The proposed project's potential for utilizing a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- The proposed project's potential for non-compliance with Federal, State, and local statutes and regulations related to solid waste.

3.12.4 ENVIRONMENTAL IMPACTS

3.12.4.1 THE PROPOSED PROJECT'S POTENTIAL FOR EXCEEDING WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD.

DISCUSSION OF IMPACT ANALYSIS

There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. Table 3-25 provides an estimate of waste water generation from the various project elements within the Planning Area. The proposed new development within the planning area is projected to generate 133,018 gallons of waste water on a daily basis.

Table 3-25
Potential Waste Water Generation Impact from Future Development

Area	Project Element (Description)	Generation Rate	Effluent Generation
Area 1	Building 20 Retail (15,000 sq. ft.)	0.08 gals./day/sq. ft.	9,869 gals./day
	Building 21 Retail (107,150 sq. ft.)		
	Traveler's Hotel (80,000 sq. ft., 174 rooms)	105 gals./day/room	28,350 gals./day
	Loft Hotel (93,000 sq. ft., 96 rooms)		
	Food/Retail (45,571 sq. ft.)	0.08 gals./day/sq. ft.	3,864 gals./day
Area 2	Building 22 Retail (46,834 sq. ft.)	0.08 gals./day/sq. ft.	5,408 gals./day
	Building 23 Retail (23,107 sq. ft.)		
	Recreation/Comm. Bldg. (120,000 sq. ft.)	0.08 gals./day/sq. ft.	9,696 gals./day
	Hotel (185,000 sq. ft., 500 rooms)	1.05 gals./day/room	52,500 gals./day
	Gaspar Food Pad (3,140 sq. ft.)	0.08 gals./day/sq. ft.	266 gals./day
	Entertainment Complex (150,000 sq. ft.)	0.08 gals./day/sq. ft.	12,120 gals./day
Area 3	Pads 1, 2, and 41 Fast Food Restaurant (8,400 sq. ft.)	0.08 gals./day/sq. ft.	1,051 gals./day
	Pad 3 Restaurant (5,000 sq. ft.)	0.30 gals./day/sq. ft.	1,500 gals./day
	Pad 5 Office ¹ . (70,000 sq. ft.)	0.11 gals./day/sq. ft.	7,952 gals./day
	Warehouse/Industrial (55,000 sq. ft.)	0.01 gals./day/sq. ft.	440 gallons/day

Notes:

1. Pad 5 may be developed as a 4,000 square-foot fast food restaurant use with a drive through lane instead of the office building. November 21, 2018

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. The effluent generated by the project would be accommodated by Water Reclamation Plant without needing to expand treatment capacity. Impacts would be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

There will be an adequate capacity to treat the additional wastewater generated by the proposed project. Impacts from the proposed project would be less than significant with implementation of the aforementioned mitigation.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.2 THE PROPOSED PROJECT’S POTENTIAL FOR REQUIRING THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

DISCUSSION OF IMPACT ANALYSIS

The proposed project would result in the installation of new water laterals that would connect to the existing water lines within adjacent roadways. The various project elements will be required to install water efficient fixtures. In addition, the Applicant must plant drought tolerant landscaping. The proposed project’s anticipated consumption for the various project elements is summarized in Table 3-26.

Table 3-26
Potential Water Consumption Impact from Future Development

Area	Project Element (Description)	Consumption Rate	Water Consumption
Area 1	Building 20 Retail (15,000 sq. ft.)	0.10 gals./day/sq. ft.	12,337 gals./day
	Building 21 Retail (107,150 sq. ft.)		
	Traveler’s Hotel (80,000 sq. ft., 174 rooms)	130 gals./day/room	35,000 gals./day
	Loft Hotel (93,000 sq. ft., 96 rooms)		
	Food/Retail (45,571 sq. ft.)	0.11 gals./day/sq. ft.	4,830 gals./day
Area 2	Building 22 Retail (46,834 sq. ft.)	0.10 gals./day/sq. ft.	6,761 gals./day
	Building 23 Retail (23,107 sq. ft.)		
	Recreation/Comm. Bldg. (120,000 sq. ft.)	0.10 gals./day/sq. ft.	12,120 gals./day
	Hotel (185,000 sq. ft., 500 rooms)	130 gals./day/room	65,000 gals./day
	Gaspar Food Pad (3,140 sq. ft.)	0.11 gals./day/sq. ft.	332 gals./day
	Entertainment Complex (150,000 sq. ft.)	0.10 gals./day/sq. ft.	15,150 gals./day
Area 3	Pads 1, 2, and 41 Fast Food Restaurant (8,400 sq. ft.)	0.11 gals./day/sq. ft.	1,314 gals./day
	Pad 3 Restaurant (5,000 sq. ft.)	0.40 gals./day/sq. ft.	2,000 gals./day
	Pad 5 Office ¹ . (70,000 sq. ft.)	0.14 gals./day/sq. ft.	9,940 gals./day
	Warehouse/Industrial (55,000 sq. ft.)	0.01 gals./day/sq. ft.	550 gallons/day

Notes:

1. Pad 5 may be developed as a 4,000 square-foot fast food restaurant use with a drive through lane instead of the office building.

Source: Studio Progetti. *A Project of Craig Realty Group. [The] Citadel*. November 21, 2018

The proposed new development within the planning area is projected to consume 165,434 gallons of water on a daily basis. Cal Water's East Los Angeles District supplies totaled 17,504 acre-feet in 2010. CalWater's supplies are projected to increase to 18,915 acre-feet in 2020 and 19,226 acre-feet in 2040. The proposed project's increased water demand of 165,434 gallons per day translates into 60,383,410 gallons of water annually or 185.3 ~~47~~ acre feet per year which would represents 0.97 percent of the total projected 2020 supplies under all water year scenarios (normal, single dry year, and multiple dry year).

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.3 THE PROPOSED PROJECT'S POTENTIAL FOR REQUIRING THE CONSTRUCTION OF NEW STORM WATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

DISCUSSION OF IMPACT ANALYSIS

The building contractors will be required to adhere to the applicable LID report that identifies both construction and post-construction (operational) BMPs. The implementation of the required BMPs will improve the quality and reduce the quantity of stormwater runoff by facilitating proper filtration and percolation of excess runoff. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site.

Runoff waters would be discharged in a manner to prevent downstream or off-site flooding, erosion, or sedimentation in accordance with City and SWMP requirements. The drainage system is designed to meet all City requirements and will take into account future potential sources of incoming flow when sizing the public storm drain portion of the system. Erosional and water quality impacts would be mitigated through implementation of the SWPPP during construction and through the drainage control requirements set by City and State requirements. Also, any impacts would be further mitigated through a series of site-specific BMPs and a drainage system that will be designed to handle a 25-year storm event pursuant to City regulations and local SWMP requirements.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.4 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING INSUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCES, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED.

DISCUSSION OF IMPACT ANALYSIS

The proposed project would result in the installation of new water laterals that would connect to the existing water lines within adjacent roadways. The various project elements will be required to install water efficient fixtures. In addition, the Applicant must plant drought tolerant landscaping. The proposed project's anticipated consumption for the various project elements is summarized in Table 3-26.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.5 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN AN OVERCAPACITY OF THE STORM DRAIN SYSTEM, CAUSING AREA FLOODING.

DISCUSSION OF IMPACT ANALYSIS

The Applicant will prepare a LID report that will identify both construction and post-construction (operational) BMPs. The implementation of the required BMPs will improve the quality and reduce the quantity of stormwater runoff by facilitating proper filtration and percolation of excess runoff. Therefore, the risk of off-site erosion and/or siltation will be minimal given the reduced water runoff and the lack of pervious surfaces outside of the project site. Additionally, the project site is located 1.80 miles to the northeast of the channelized Los Angeles River.¹⁴² The proposed project will be restricted to the designated sites and will not alter the course of the Los Angeles River. In addition, the project will not substantially

¹⁴² Google Earth. Website accessed January 24, 2019. <http://www.maps.google.com/maps>

alter the site's natural drainage patterns because previous construction activities may have altered this site's original drainage patterns. No other bodies of water are located in and around the project site. As a result, the impacts are considered to be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.6 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER THAT SERVES OR MAY SERVE THE PROJECT, THAT IT HAS INADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS

DISCUSSION OF IMPACT ANALYSIS

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. The effluent generated by the project would be accommodated by Water Reclamation Plant without needing to expand treatment capacity. Impacts would be less than significant.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.7 THE PROPOSED PROJECT'S POTENTIAL FOR UTILIZING A LANDFILL WITH INSUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS.

DISCUSSION OF IMPACT ANALYSIS

The Sanitation Districts operate a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. Trash collection for commercial land uses is provided by the other private haulers for disposal into the Commerce Incinerator and into area landfills. Waste may also be transferred to either the Mesquite Regional Landfill in Imperial County or to the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF). The Los Angeles County Sanitation District 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. The proposed new development within the planning area is projected to generate 42,939 pounds of solid waste per day. The potential solid waste generation from the various project elements are summarized in Table 3-27.

Table 3-27
Potential Solid Waste Generation Impact from Future Development

Area	Project Element (Description)	Generation Rate	Solid Waste Generation
Area 1	Building 20 Retail (15,000 sq. ft.)	6 lbs./day/1,000 sq. ft.	732 lbs./day.
	Building 21 Retail (107,150 sq. ft.)		
	Traveler's Hotel (80,000 sq. ft., 174 rooms)	4.2 lbs./day/room	11,340 lbs./day.
	Loft Hotel (93,000 sq. ft., 96 rooms)		
	Food/Retail (45,571 sq. ft.)	4.2 lbs./day/1,000 sq. ft.	1,914 lbs./day.
Area 2	Building 22 Retail (46,834 sq. ft.)	6 lbs./day/1,000 sq. ft.	401 lbs./day.
	Building 23 Retail (23,107 sq. ft.)		
	Recreation/Comm. Bldg. (120,000 sq. ft.)	42 lbs./day/1,000 sq. ft.	5,040 lbs./day.
	Hotel (185,000 sq. ft., 500 rooms)	42 lbs./day/room sq. ft.	21,000 lbs./day.
	Gaspar Food Pad (3,140 sq. ft.)	42 lbs./day/1,000 sq. ft..	132 lbs./day.
	Entertainment Complex (150,000 sq. ft.)	6 lbs./day/1,000 sq. ft..	900 lbs./day.
Area 3	Pads 1, 2, and 41 Fast Food Restaurant (8,400 sq. ft.)	42 lbs./day/1,000 sq. ft.	520 lbs./day.
	Pad 3 Restaurant (5,000 sq. ft.)	42 lbs./day/1,000 sq. ft.	210 lbs./day.
	Pad 5 Office ¹ . (70,000 sq. ft.)	6 lbs./day/1,000 sq. ft.	420 lbs./day.
	Warehouse/Industrial (55,000 sq. ft.)	6 lbs./day/1,000 sq. ft.	330 lbs./day.

Notes:

1. Pad 5 may be developed as a 4,000 square-foot fast food restaurant use with a drive through lane instead of the office building.

Source: Studio Progetti. *A Project of Craig Realty Group. [The] Citadel.* November 21, 2018

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

3.12.4.8 THE PROPOSED PROJECT'S POTENTIAL FOR NON-COMPLIANCE WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE.

DISCUSSION OF IMPACT ANALYSIS

The proposed retail development, like all other development in Commerce, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.

MITIGATION OF POTENTIAL IMPACTS

No mitigation was required since no significant impacts were identified.

SIGNIFICANT UNAVOIDABLE IMPACTS AFTER MITIGATION

The analysis determined the proposed project would not result in any significant adverse impacts.



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SECTION 4. MANDATORY CEQA CONSIDERATIONS

This chapter contains analysis of the CEQA mandated discussions requiring the consideration of a range of issues extending beyond analysis of project-specific impacts to individual resource areas. The topics included within this chapter include:

- Growth Inducing Impacts (CEQA Guidelines §15126.2(d));
- Significant Irreversible Environmental Changes and Irretrievable Commitment of Resources (CEQA Guidelines §15126.2(c));
- Significant and Unavoidable Adverse Impacts (CEQA Guidelines §15126.2(b));
- Energy Conservation (CEQA Appendix F): and,
- Cumulative Impacts.

4.1 GROWTH-INDUCING IMPACTS

Public Resources Code Section 21100(a) (5) requires that the growth-inducing impacts of a project be addressed in the environmental impact report. According to CEQA, a project may be growth-inducing if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to growth, taxes community service facilities, or encourages or facilitates other activities that cause significant environmental effects.

Pursuant to State CEQA Guidelines §15126.2(d), an EIR must “discuss the ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...”. The purpose of this section is to evaluate the potential for growth-inducing effects of the Citadel Expansion Project. A project would directly induce growth if it would remove growth control barriers to growth, such as a change to a jurisdiction’s General Plan and Zoning Ordinance to allow increased development. The CEQA Guidelines require a discussion of growth inducement, but do not require speculation as to exactly when and where growth may or may not occur, and what form that growth may take.

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area, such as utilities, improved roadways, and expanded public services. Those variables that typically contribute to growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The Planning Area is developed and located within an urban area. Portions of Area 2 and 3 are presently undeveloped though they were previously developed. The proposed project will be an infill project.

- *The extension of roadways and other transportation facilities.* The only roadway extension will be Gaspar Avenue which will serve the proposed project.
- *The extension of infrastructure and other improvements.* Any new infrastructure lines will serve the proposed project only.
- *Major off-site public projects (treatment plants, etc.).* No major public improvements will be required to accommodate the proposed project.
- *The removal of housing requiring replacement housing elsewhere.* No housing units will be removed as part of the proposed project's implementation.
- *Additional population growth leading to increased demand for goods and services.* The proposed project will involve any residential development. Any potential population growth will be indirectly related to employment generation.
- *Short-term growth inducing impacts related to the project's construction.* The proposed project's implementation would result in employment generation. This anticipated demand for new construction can be accommodated by the existing local labor market.

Potential Indirect Population Growth Impacts from Job Creation

The proposed project has the potential to indirectly induce population growth by creating approximately three jobs per 1,000 square feet for the area, totaling approximately 1,750 new jobs that will be created by the proposed project. However, the proposed project would more likely respond to regional demand for additional goods and services. The City of Commerce is currently experiencing a period of population growth. The proposed Citadel Expansion Project would accommodate existing and projected future increased demand for entertainment, commercial recreation, retail services, and other services as well as increased demand for jobs. The proposed project would generally accommodate rather than induce population growth.

The current unemployment rate for the City of Commerce is 5.8% which translates into 300 local residents actively seeking work. The corresponding figures for surrounding communities including Bell (600 unemployed persons or an unemployment rate of 4.2%); Bell Gardens (700 unemployed persons or an unemployment rate of 4.8%); Maywood (500 unemployed persons or an unemployment rate of 3.7%); East Los Angeles (3,800 unemployed persons or an unemployment rate of 6.6%); and Montebello (1,200 unemployed persons or an unemployment rate of 4.2%). Within these five adjacent communities, there are a total of 6,800 persons actively seeking work.

Potential Economic Growth

The proposed project has the potential to induce economic growth. By creating approximately three jobs per 1,000 square feet for the area, the proposed project has the potential to help further decrease the City's unemployment rate. With a greater percentage of the population employed, the average spending power of

the local residents would increase. Thus, the average local resident would have more money to spend on housing and retail goods, which would increase Commerce's tax base for both property and sales taxes. In addition, the proposed project would draw in consumers from the region.

4.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES & IRRETRIEVABLE COMMITMENT OF RESOURCES

This section considers the effects of the proposed project that would result in a commitment of resources and uses of the environment that could not be recovered following implementation. Public Resources Code Section 21100(b)(2)(B) requires an EIR to include a detailed statement setting forth any significant effects on the environment that would be irreversible if a project is implemented. Consideration of significant irreversible environmental changes pursuant to §15126.2(c) of the State CEQA Guidelines includes evaluation of the use(s) of nonrenewable resources during the initial and continued phases of the project. Furthermore, the EIR must indicate if this use of resources represents an irreversible commitment.

Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. An irreversible or irretrievable commitment of resources would occur when resources are consumed, committed, or lost as a result of the project's construction and/or subsequent operation. The commitment of a resource would be "irreversible" if the project started a process that could not be reversed or stopped. As a result, the resource productivity or its utility would be consumed, committed, or lost forever. Commitment of a resource would be considered "irretrievable" when the project would directly eliminate the resource, its productivity, or its utility for the life of the project and beyond.

In addition to the continued commitment of the project site to urban development, the proposed project would involve the consumption of energy derived from nonrenewable sources for electricity to power on-site equipment and fossil fuels for project-related vehicle trips. Building materials could be considered permanently consumed. These changes would be irreversible. However, the consumption of these resources are not unique or significant, and will contribute to regional and local waste management goals related to the diversion of solid waste. As a result, the changes associated with the proposed project's construction and subsequent operation does not constitute significant adverse impacts.

4.3 SIGNIFICANT & UNAVOIDABLE IMPACTS

This section indicates those significant irreversible environmental changes that would be involved in the approval and subsequent implementation of the proposed project. The development arising from the construction and subsequent operation of the proposed project will represent a long-term commitment of the project site to the proposed use. The environmental analysis contained in Section 3 of this EIR identified potential adverse impacts that may result from the implementation of the proposed project.

- *Construction Air Quality Impacts.* The daily construction emissions will exceed the SCAQMD significance thresholds for ROG (reactive organic gases). Therefore, the mass daily construction-related impacts associated with the proposed project would be significant.
- *Operational Air Quality Impacts.* The proposed project would also generate operational emissions that would still exceed the thresholds for ROG and NO_x ~~and PM₁₀~~. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt a Statement of Overriding Considerations with respect to air quality impacts.
- *Greenhouse Gas Impacts.* The project-related operational emissions (direct and indirect) would result in ~~19,480 MTCO₂E/year~~ 31,141 MTCO₂E/year. This figure represents the estimated mitigated emissions, which includes the use of energy and water efficient appliances and fixtures, the location of the nearest bus stops, the project's infill nature, and that the project contains a mix of uses. Despite the use of in-program mitigation measures, the project's operational GHG emissions are still expected to exceed the 10,000 MTCO₂E/year thresholds.
- *Traffic Impacts.* When considering *Future with Truck Traffic and Project* if the specific intersection improvements are determined to be infeasible during the design process, the following four study intersections would remain significantly impacted after mitigation: Atlantic Boulevard & Telegraph Road; I-5 Northbound Ramps/Camfield Avenue & Telegraph Road; I-5 Ramps/Commerce Casino & Telegraph Road; and, Washington Boulevard & Telegraph Road.
- *Cumulative Air Quality Impacts.* To determine if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is classified as non-attainment, a cumulative impact analysis was performed to evaluate the combined air quality impacts of any given project and the impacts from existing and proposed future developments in the area. The analysis determined that the cumulative air emissions exceeded the SCAQMD thresholds for NO_x.
- *Cumulative Greenhouse Gas Impacts.* The related projects would generate 69,468 pounds of CO₂E on a daily basis. This translates into 11,525 metric tons of CO₂E annually. The SCAQMD's threshold is 10,000 metric tons of GHG annually. As a result, the potential cumulative GHG impacts are considered to be cumulatively significant.

4.4 CUMULATIVE IMPACT ANALYSIS

Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. Both CEQA and the *CEQA Guidelines* require that cumulative impacts be analyzed in an EIR. As set forth in the *CEQA Guidelines* Section 15130(b),

“the discussion of cumulative impacts shall reflect the severity of the impacts, and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone.”

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Section 15130 of the *CEQA Guidelines* requires that an EIR address cumulative project impacts in which the project has possible environmental effects that are individually limited but “cumulatively considerable.” The cumulative project list, identified in Table 4-1 and Exhibit 4-1, was provided by the City of Commerce working with the project traffic engineer. As indicated in Table 4-1, the 18 related projects include 198,781 square feet of manufacturing uses, 323,835 square feet of warehouse uses, 94,446 square feet of office space, 198,262 square feet of retail floor area, 9,542 square feet of entertainment uses, 2,600 square feet of fast-food, a small shopping center consisting of 16,000 square feet, and a single residential unit.

Table 4-1
Cumulative (Related) Projects

Map Location	Land Use	Description
1. General Plan Amendment 7316 Gage Avenue	Manufacturing and Office	156,650 sq. ft.* 16,130 sq. ft.
2. Retail Center Southwest Corner of Atlantic Boulevard and Washington Boulevard	Retail	148,200 sq. ft.
3. Retail Use 7344 Bandini Road	Retail	25,250 sq. ft.
4. Costco Gas Station 6340 Washington Boulevard	Gas Station	2,306 sq. ft.
5. Warehouse Building 5701 Union Pacific	Warehousing	15,000 sq. ft.
6. Residential 4906 Nobel Street	Single-Family Housing	1 DU*
7. Paris Baguette 6100 Malt Avenue	Bakery	16,300 sq. ft.
8. Warehouse Building 6605 Flotilla Street	Warehousing	42,131 sq. ft.
9. Commercial Entertainment 5427 Washington Boulevard	Entertainment	4,860 sq. ft.
10. Escape Room 5121 South Atlantic Boulevard	Entertainment	4,682 sq. ft.
11. Retail Use 5521 Telegraph Road	Retail	4,206 sq. ft.
12. Warehouse Building 6800 East Washington Boulevard	Warehousing	40,835 sq. ft.
13. Warehouse Building 6300 Telegraph Road	Warehousing	83,000 sq. ft.
14. Warehouse Building 7140 Bandini Boulevard	Warehousing	185,000 sq. ft.
15. AltaMed Office Conversion 2035 Camfield Avenue	Office	78,316 sq. ft.
16. Vehicle Repair 7500 Wellman Street	Auto Care Center	2,000 sq. ft.
17. Fast Food Restaurant 5556 East Washington Boulevard	Fast Food	2,600 sq. ft.
18. Retail 5200 Triggs Street	Shopping Center	16,000 sq. ft.

Note

Sq. ft. square feet;

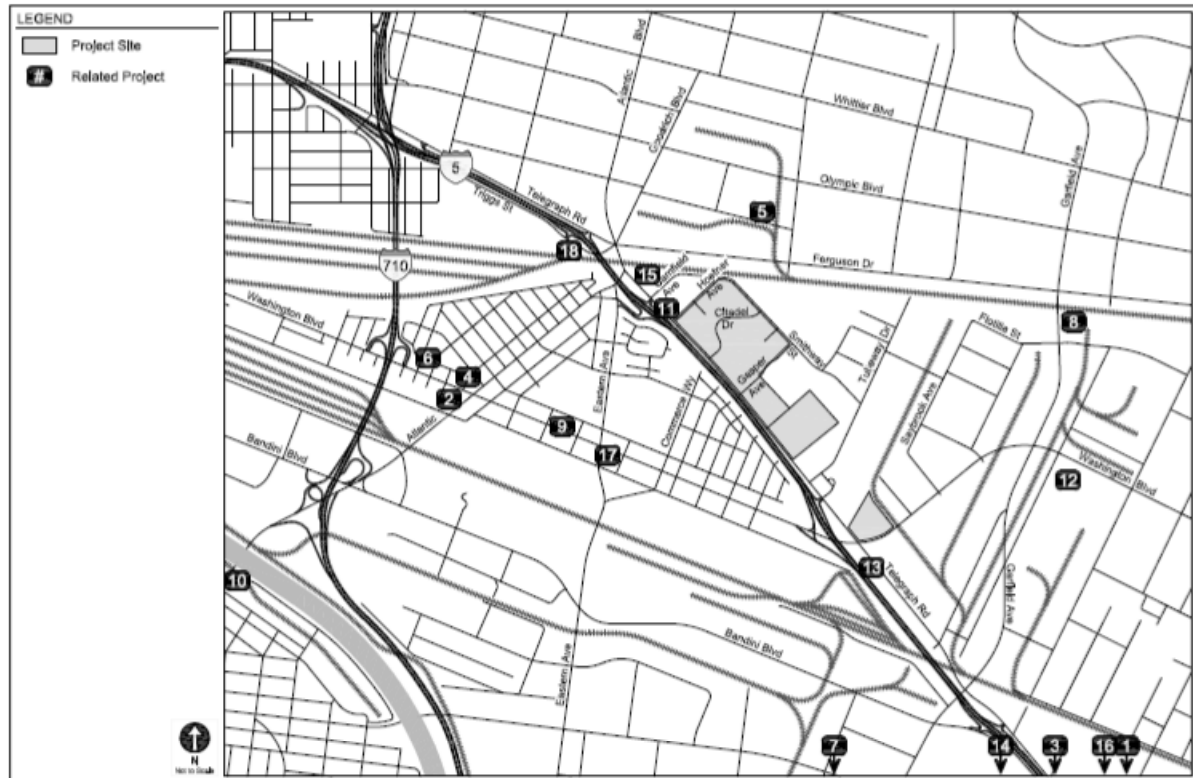


EXHIBIT 4-1
LOCATION OF RELATED PROJECTS
Source: Gibson Transportation Consultant Inc.

The potential for projects to have a cumulative impact depends on both geographic location as well as the timing of development. The geographic area affected by cumulative projects varies depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise, whereas the area affected by a project's air emissions generally includes the local South Coast Air Basin, and impacts associated with aesthetics would include the affected view shed. The analysis of cumulative impacts is provided herein in Section 4.5.

As noted above, projects considered in this analysis include those that have recently been completed, are currently approved and/or under construction, or are in the planning stages. Schedule is particularly relevant to the consideration of cumulative construction-related impacts, since construction impacts tend to be relatively short-term. However, for future projects, construction schedules are often broadly estimated and can be subject to change. Although the timing of the future projects are likely to fluctuate due to schedule changes or other unknown factors, this analysis assumes these projects would be implemented concurrently with construction of the proposed project.

4.5.1 CUMULATIVE AESTHETIC IMPACTS

The related projects identified in Table 4-1 are not situated within view of the Planning Area and, therefore, the visual and light and glare impacts of the proposed project and one or more of the cumulative impacts would not be additive. Overall, the proposed project's implementation will improve the overall visual and aesthetic quality of those properties located along the north side of the Telegraph Road corridor. The existing underutilized properties within Areas 2 and 3 consisting of vacant building and undeveloped properties will undergo development with new commercial buildings. The existing underutilized and dilapidated parcels within Area 2 and Area 3 will be improved with new development and landscaping.

There are no designated State scenic highways located in the vicinity of the project site or in the vicinity of the related projects.¹⁴³ In addition, there are no City-designated scenic highways in Commerce. The new buildings will include architectural features that will improve the Planning Area's appearance along the Telegraph Road and Washington Boulevard frontages. In addition, the proposed project as well as the related projects will not affect any trees, outcroppings, or historic resources. The project sites have already undergone development and there are no natural topographic features remaining.¹⁴⁴

4.5.2 CUMULATIVE AIR QUALITY IMPACTS

To determine if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is classified as non-attainment, a cumulative impact analysis was performed to evaluate the combined air quality impacts of any given project and the impacts from existing and proposed future developments in the area. As indicated in Table 4-2, the cumulative air emissions exceeded the SCAQMD thresholds for NOx.

¹⁴³ California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov

¹⁴⁴ Blodgett Baylois Environmental Planning. Site Survey. (October 8, 2018 through January 7, 2019).

Table 4-2
Estimated Operational Emissions in lbs/day for Combined
Cumulative Projects

Emission Source	ROG	NO₂	CO	SO₂	PM₁₀	PM_{2.5}
Area-wide (lbs/day)	18.89	--	0.16	--	--	--
Energy (lbs/day)	0.17	1.57	1.31	--	0.11	0.11
Mobile (lbs/day)	18.07	75.37	179.73	0.66	53.70	14.67
Total (lbs/day)	37.14	76.94	181.21	0.67	53.82	14.79
Daily Thresholds	55	55	550	150	150	55

Source: California Air Resources Board CalEEMod [computer program].

4.5.3 CUMULATIVE CULTURAL RESOURCES IMPACTS

All of the related projects identified in Table 4-1 occupy properties that have been previously developed. As a result, no natural undisturbed areas will be affected by this future development. For those project's that require some form of discretionary approval, consultation with local Native American Tribes will be required. In general, a project's potential cultural impact is specific to the project-specific and any impact and attendant mitigation is directly related to the potential project.

4.5.4 GREENHOUSE GASES

The related projects shown in Table 4-1 would contribute to global climate change as a result of emissions of GHGs, primarily CO₂, emitted by construction and operational activities. The related projects would generate 69,468 pounds of CO₂E on a daily basis. This translates into 11,525 metric tons of CO₂E annually. The SCAQMD's threshold is 10,000 metric tons of GHG annually. As a result, the potential cumulative GHG impacts are considered to be cumulatively significant.

Table 4-3
Greenhouse Gas Emissions

Source	GHG Emissions (Lbs./Day)			
	CO₂	CH₄	N₂O	CO₂E
Total Construction Emissions				
Construction GHG	14,212.05	3.01	--	14,263.80
Long-Term Operational Emissions (Mitigated)				
Area	0.33	--	--	0.34
Energy	1,887.94	0.03	0.03	1,899.16
Mobile	67,488.19	3.21	--	67,568.66
Total	69,376.47	3.25	0.03	69,468.17

Source: CalEEMod.V. 2016.3.2. Note: Slight variations may occur due to rounding.

4.5.5 HAZARDS AND HAZARDOUS MATERIALS

The hazards and hazardous materials impacts associated with a project like the one proposed are usually localized and occur on a project by project basis, rather than in a cumulative manner. Because the proposed project contains mitigation measures to abate site-specific hazards, any potential cumulative impact associated with the proposed project would be reduced to less than significant levels.

Prior to the commencement of any new development, a thorough investigation of building interiors must be undertaken to ascertain whether ACMs or other residual contaminants are present. Should these contaminants be identified as part of the site investigation, remediation and disposal must be undertaken pursuant to CalEPA (Department of Toxic Substances Control) and Federal EPA requirements. The future development may also involve the removal of the existing, older structures and their replacement with newer structures and improvements that will be constructed in conformance to existing codes. The replacement of the existing structures with new development constructed to current building, health, and safety codes is considered a beneficial impact. As a result, no significant adverse impacts are anticipated given the nature of the proposed uses and the replacement of older structures pursuant to the more up to date regulations.

4.5.6 HYDROLOGY AND WATER QUALITY

The related projects may involve activities that have the potential to increase the use of groundwater resources. However, California Water Service Company, which is the primary provider for the Commerce area, indicates in its 2010 Urban Water Management Plan that adequate groundwater supplies are available to serve projected demand through 2040 under all water year scenarios. These demand figures account for existing water use, plus increased water use in the future from population growth including that associated with the projects listed in Table 4-1. As a result, the proposed project together with the related projects would not deplete groundwater supplies.

The development projects listed in Table 4-1 are located in the project vicinity may have the potential to increase impervious surface coverage and, therefore, may result in increased runoff volumes in downstream waterways. These projects would be required to provide drainage facilities that collect and detain runoff such that offsite releases are controlled and do not create flooding in accordance with local regulations. The proposed project and the related projects will be required to implement a storm drainage system that would reduce peak storm event flows so as to prevent the inundation of downstream drainage facilities. Therefore, the proposed project, in conjunction with other planned and approved projects, would not have a cumulatively considerable impact on hydrology and water quality.

4.5.7 LAND USE AND PLANNING

The Planning Area does not contain any established residential communities. As indicated in Table 4-1, the 18 related projects include 198,781 square feet of manufacturing uses, 323,835 square feet of warehouse uses, 94,446 square feet of office space, 198,262 square feet of retail floor area, 9,542 square feet of entertainment uses, 2,600 square feet of fast-food, a small shopping center consisting of 16,000 square feet, and a single residential unit. To the extent one or more of those projects would divide an

established community, it would be required to address that issue. However, because there are no established communities on the project site, this precludes the proposed project from cumulatively contributing to this impact. Development projects in the Commerce area would be required to demonstrate consistency with all applicable City of Commerce 2020 General Plan and Municipal Code requirements. This would ensure that these projects comply with applicable planning regulations.

For the projects listed in Table 4-1 that have been previously approved, they have previously been found to be consistent with all applicable General Plan (as amended) and Municipal Code requirements. For those projects that are pending, the City would be required to issue findings demonstrating consistency with the applicable General Plan (as amended) and Municipal Code requirements if they are ultimately approved.

4.5.8 NOISE

Construction-related material haul trips would raise ambient noise levels along haul routes depending on the number of haul trips made and types of vehicles used. The existing noise environment in the City of Commerce is dominated by motor vehicle traffic traveling on major arterials and the I-710 and I-5 Freeways. The sensitive receptors in Commerce are concentrated within the five residential neighborhood located in Commerce.

The traffic on the freeways, streets, and railways that traverse Commerce are the primary contributors to urban noise. To a lesser degree, the City's industries are also sources of stationary noise. The high volumes of truck traffic, particularly on local streets, are responsible for the relatively high daytime noise levels. Noise measurements taken near arterial roadways and the freeway reveal that traffic noise levels may typically exceed 90 dBA. As a result, the majority of the City is located within areas where the outdoor ambient noise levels often exceed 65 dBA during the daytime periods. The City's numerous rail yards and rail lines also account for high levels of localized noise. The Union Pacific and Burlington Northern & Santa Fe rail yards serve as a major distribution center for goods movement. Rail traffic, truck traffic, and loading and unloading operations produce significant levels of noise during the day.

The change in traffic noise levels from existing levels are not expected to be perceptible over the long-term. No roadway segments are likely to experience a significant increase in noise levels (in excess of 3.0 dBA). The increased traffic noise along all major roadway segments will be well less than 3.0 dBA; generally considered to be perceptible due to the citywide distribution of traffic from the related projects. It typically requires a doubling of traffic volumes to generate an increase in the ambient noise levels of 3.0 dB or greater. As a result, no significant adverse impacts related to traffic noise are anticipated.

The introduction of new development involving new commercial and industrial uses will lead to the introduction of new sources of stationary noise. However, the potential noise levels from these commercial uses are likely to be comparable to that of existing development. In addition, there are no land use plan changes that involve the introduction of commercial or industrial uses into noise sensitive areas. Furthermore, no noise sensitive receptors (homes, schools, or hospitals) will be placed in high noise areas given the location and extent of the related projects.

4.5.9 PUBLIC SERVICES

The related projects will replace substandard and dilapidated uses, resulting in a beneficial impact in terms of eliminating existing potential fire hazards and law enforcement services. The rehabilitation of older structures as part of any new development will reduce potential fire hazards by removing older electrical systems and requiring compliance with current, building that is more stringent codes in the new construction. The greatest potential impact is related to calls for service for paramedic services due to the increased concentrations of persons anticipated with the new development. The Los Angeles County Fire Department will review all new development plans and any new development will be required to conform to applicable fire protection and prevention requirements including, but not limited to, building setbacks, emergency access, interior sprinklers, etc.

4.5.10 TRAFFIC

Information regarding potential future projects either under construction, planned, or proposed for development within or near the study area was obtained from several sources. These sources include City staff as well as recent studies conducted in the area. No planned or proposed developments beyond City boundaries are expected to have a noticeable impact on traffic levels in the Planning Area. These related projects are described in Table 4-4.

**Table 4-4
Related Projects Traffic Generation**

Project	Weekday			Saturday	
	Daily Trips	AM Peak Hour	PM Peak Hour	Daily Trips	Midday Peak Hour
1. General Plan Amendment 7316 Gage Avenue	776	139	138	1,042	156
2. Retail Center SW corner of Atlantic Blvd & Washington Blvd.	5,595	139	565	6,835	667
3. Retail Use 7344 Bandini Road	953	24	96	1,165	114
4. Costco Gas Station 6340 Washington Boulevard	1,481	94	114	2,500	182
5. Warehouse Building 5701 Union Pacific	26	3	3	2	1
6. Residential 4906 Nobel Street	9	1	1	10	1
7. Paris Baguette 6100 Malt Avenue	615	15	621	752	73
8. Warehouse Building 6605 Flotilla Street	73	7	8	6	2
9. Commercial Entertainment 5427 Washington Boulevard	183	5	19	224	22
10. Escape Room 5121 South Atlantic Boulevard	177	4	18	216	21
11. Retail Use 5521 Telegraph Road	159	4	16	194	19
12. Warehouse Building 6800 East Washington Boulevard	71	7	8	6	2
13. Warehouse Building 6300 Telegraph Road	144	14	16	12	4
14. Warehouse Building 7140 Bandini Boulevard	322	31	35	28	9
15. AltaMed Office Conversion 2035 Camfield Avenue	763	91	90	173	42
16. Vehicle Repair 7500 Wellman Street	33	5	6	47	13
17. Fast Food Restaurant 5556 East Washington Boulevard	1,224	104	85	1,602	143
18. Retail 5200 Triggs Street	604	15	61	738	72
Total Related Project Trips	13,208	702	1,341	15,552	1,543

Trip generation estimates based on *Trip Generation, 10th Edition* (Institute of Transportation Engineers, 2017).

Table 12 included in the Traffic Study summarizes the results of the analysis of the signalized study intersections under the Future with Truck Traffic without Project conditions. Background traffic growth and traffic generated by related projects is expected to cause deterioration in operating conditions from the Existing Conditions even without consideration of potential traffic associated with the project. As shown in Table 12, 12 of the 23 signalized intersections are anticipated to operate at LOS D or better during the analyzed peak hours under Future with Truck Traffic without Project Conditions. The remaining 11 signalized intersections are anticipated to operate at LOS E or F during at least one of the analyzed peak hours.

4.5.11 UTILITIES

The California Water Service Company (Cal Water) East Los Angeles District service area, serves all or portions of Commerce, East Los Angeles, Montebello, Monterey Park, and Vernon. Cal Water serves the Planning Area and the related projects. The population of the East Los Angeles District service area was estimated to be 150,890 in 2010. The proposed project is estimated to consume 165,434 gallons of water per day. Cal Water's East Los Angeles District supplies totaled 17,504 acre-feet in 2010. CalWater's supplies are projected to increase to 18,915 acre-feet in 2020 and 19,226 acre-feet in 2040. The proposed project's ~~net increase in~~ increased water demand of 165,434 gallons per day translates into 60,383,410 gallons of water annually or 185.3 47 acre feet per year which would represents 0.97 percent ~~less than one percent~~ of total projected 2020 supplies under all water year scenarios (normal, single dry year, and multiple dry year). Furthermore, Cal Water's East Los Angeles District 2010 Urban Water Master Plan estimates that sufficient water is available to meet the needs of the service area through the year 2040, which accounts for the City of Commerce 2020 General Plan's long-term growth assumptions.

The related projects also would be required to demonstrate that they would be served with potable water service as a standard requirement of the development review process and these projects may be required to implement water conservation measures to the extent they are required. Therefore, the proposed project, in conjunction with other planned and approved projects, would not have a cumulatively considerable impact on potable water supply.

The geographic scope of the cumulative wastewater analysis is the Los Angeles County Sanitation District No. 2 service area, which encompasses all or portions of Commerce, Bell, Bell Gardens, Bellflower, Cerritos, Downey, East Los Angeles, Monterey Park, Montebello, Pico Rivera, South Gate, Vernon, and Whittier. The future related projects would be required to demonstrate that sewer service is available to ensure that adequate sanitation can be provided. The proposed project is estimated to generate 133,018 gallons of wastewater on a daily basis. The Planning Area is served by the Los Coyotes Water Reclamation Plant in Cerritos, which has a treatment capacity of 37 million gallons of wastewater per day. As of 2012, the plant treated 32 million gallons of wastewater per day, leaving 5 million gallons of daily capacity available.

The proposed project's net increase of 0.13 mgd per day would be well within the 5 mgd remaining treatment capacity of the Water Reclamation Plant. Therefore, no new facilities are necessary. For those projects listed in Table 4-1 that are located with Los Angeles County Sanitation District No. 2, they would be required to demonstrate that they would be served with wastewater service as a standard requirement of the development review process. Therefore, the proposed project, in conjunction with other planned and approved projects, would not have a cumulatively considerable impact on wastewater.

The related projects generate both construction and operational solid waste and, depending on the volumes and end uses, would be required to implement recycling and waste reduction measures. The proposed project is anticipated to generate 42,939 pounds of solid waste on a daily basis. The project's construction and operational solid waste generation would represent less than 1 percent of the remaining capacity at these facilities. As such, sufficient capacity is available to serve the proposed project as well as existing and planned land uses in Commerce and other Los Angeles County communities for the foreseeable future. Additionally, contractors will be required to implement construction and demolition debris recycling and to provide the installation of onsite facilities necessary to collect and store recyclable materials. These practices would divert substantial quantities of materials from the solid waste stream and contribute to conserving landfill capacity, thereby extending the operational life of such facilities. Accordingly, the proposed project, in conjunction with the other related projects, would not have a cumulatively considerable impact on solid waste.



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SECTION 5. ALTERNATIVES ANALYSIS

5.1 INTRODUCTION

This chapter addresses alternatives to the proposed project, describes the rationale for including them in the EIR, discusses the environmental impacts associated with each alternative, compares the relative impacts of each alternative to those of the proposed project, and discusses the relationship of each alternative to the project objectives.

5.2 CRITERIA FOR SELECTING ALTERNATIVES

An EIR need not consider every conceivable alternative to a project. According to the CEQA Guidelines, an EIR must describe a “reasonable range of alternatives” to a proposed project. The alternatives selected for comparison should be those that would attain most of the basic objectives of the project and avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines Section 15126.6). The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the decision-making body and informed public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

An EIR must evaluate the comparative merits of the alternatives and identify an environmentally superior alternative. The EIR must also briefly describe the rationale for selection and rejection of alternatives and the information upon which the Lead Agency (in this case, the City of Commerce) relied on when making the selection. It also should identify any alternatives considered but rejected as infeasible by the Lead Agency during the scoping process and briefly explain the reasons for the exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects. This chapter identifies and evaluates three alternatives to the proposed project.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The Lead Agency may make an initial determination as to which alternatives are feasible and which are infeasible, therefore providing merit to in-depth consideration for those selected for additional analysis. After consideration of various alternatives, the following were selected for evaluation: the *No Project/No Development Alternative*, the *Residential Component Alternative for Area 1*, and the *Institutional Use Alternative for Area 3*. The alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would accomplish most of the basic objectives of the project;
- The extent to which the alternative would avoid or lessen any of the identified significant environmental effects of the project;

- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and,
- The requirement of the *CEQA Guidelines* to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no-project alternative (*CEQA Guidelines* Section 15126.6(e)).

Alternatives are ultimately compared to the project objectives. The objectives for the proposed project, listed in Section 2.6, include the following:

- The addition of new upscale retail tenant uses for this key corridor (Telegraph Road) in the City;
- The erection and operation of a new state-of-the-art hotel uses;
- The creation of an aesthetically attractive, high-quality design that reflects the property’s location within view of those traveling along the I-5 Freeway;
- The provision of a high level of accessibility to and through the Telegraph Road corridor, to promote pedestrian travel and efficient vehicular access;
- The enhancement of the economic vitality of the City by providing sales tax and other revenue generation opportunities; and,
- The creation of new jobs for the local economy.

5.3 ALTERNATIVES CONSIDERED BUT REJECTED

The Lead Agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are clearly infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines*, Section 15126.6(f)(3)). This section identifies alternatives considered by the Lead Agency, but rejected as infeasible, and provides a brief explanation of the reasons for their exclusion. As noted above, alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects (*CEQA Guidelines*, Section 15126.6(c)).

An alternative site for the project need not be considered when its implementation is “remote and speculative” such as the site being out of the purview of the lead agency or beyond the control of a project applicant.

The *CEQA Guidelines* Section 15126.6(f)(2) specifies that the key question with alternative sites is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project at another location.” While other large areas of land could be found, based on the known general conditions in the area and the magnitude of the proposal, an alternative site in the area would have the same or similar significant impacts after mitigation as the project.

5.4 DESCRIPTION & ANALYSIS OF ALTERNATIVES

This EIR evaluates the following three alternatives:

- *No Project/No Development Alternative.* According to the *CEQA Guidelines*, Section 15126.6(e), the purpose of evaluating the No Project/No Development Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. However, the No Project/No Development Alternative is not the baseline for determining whether the proposed project’s impacts are significant, unless it is identical to the existing environmental setting analysis that establishes the baseline.
- *Residential Development Alternative (Area 1).* This alternative would involve the construction of a residential development within the northeastern portion of Area 1 where one of the hotels are proposed. The residential development would consist of six levels with 96 market rate units.
- *Institutional/Office Use Alternative (Area 3).* This alternative would involve the construction of a 70,000 square-foot, four-level office building. The precise occupancy is not known though it could be general office or an institutional use.

The discussion of the No Project/No Development Alternative normally proceeds along one of two lines. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the No Project/No Development Alternative will be the continuation of the plan, policy, or operation into the future. On the other hand, if the project is an individual development project on an identifiable location, the No Project/No Development Alternative should compare the environmental effects of the property remaining in its existing state. If other future uses of the land are predictable, such land uses should also be discussed as possible no project conditions and the project should be compared to those uses. For each of the project alternatives identified, a general description of the alternative is presented and a qualitative discussion of its comparative environmental impacts is provided.

5.4.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The *CEQA Guidelines* (Section 15126.6(e)(3)(B)) provides the following guidance on the No Project Alternative, “If the project is...a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.” Under the No Project/No Development Alternative, the project would not be built and the existing uses within the project site would remain in its present condition. No

significant upgrades to the circulation system or utility infrastructure are anticipated. Under the No Project/No Development Alternative, the proposed project would not be constructed and the existing vacant land would remain. The potential impacts of this alternative are described below.

- *Aesthetics.* No changes in the Planning Area's visual character would occur under this alternative. Areas 2 and 3 would continue to remain blighted indefinitely.
- *Air Quality.* No new short-term (construction) or long-term (operational) air pollutant emissions would occur as a result of the No Project/No Development Alternative. This alternative also would not result in an increase in emissions from a much greater level of traffic associated with the proposed project. The No Project/No Development Alternative would continue to result in fugitive dust generation associated with the barren top soil. This alternative could result in continued fugitive dust emissions from Areas 2 and 3 due to the barren soils.
- *Cultural Resources.* The No Project/No Development Alternative would not disturb the current condition of the project area, and thus, would not unearth any known or unknown historic, archeological, or paleontological resources that might be present. This alternative would not involve excavation and or grading activities that could potentially disturb the subsurface. Thus, the No Project/No Development Alternative, when compared to the proposed project, would have fewer potential impacts to cultural resources.
- *Greenhouse Gas Emissions.* The No Project/No Development Alternative would not result in an increase in emissions from a much greater level of traffic associated with the proposed project and would not result in an increase in greenhouse gas emissions (GHG). As a result, the No Project/No Development Alternative would avoid or substantially lessen the significant impacts to GHG emissions as compared to the proposed project.
- *Hazards and Hazardous Materials.* Under the No Project/No Development Alternative, no potential exposure to hazards associated with the routine transport, use, or disposal of hazardous materials would occur. The No Project/No Development Alternative would not result in impacts associated with the exposure of people to hazardous materials. The proposed project would introduce small amounts of hazardous materials on both a short-term basis (i.e., during construction) and in the long-term through the use and storage of household hazardous materials by commercial businesses that would occupy the site. However, the proposed project's potential hazardous materials impacts would be mitigated to levels considered less than significant. Still, the No Project/No Development Alternative would have fewer impacts than the proposed project.
- *Hydrology and Water Quality.* The No Project/No Development Alternative would not result in any substantial changes to the hydrologic conditions or to water quality near the project site. Under this alternative, there would be no increased impacts or changes to the existing drainage patterns or volume of storm water runoff compared to the proposed project. Flood hazards would remain unchanged from current conditions. The comprehensive surface drainage/storm drain system to collect and convey runoff on the project site would not be constructed. The No

Project/No Development Alternative would have reduced impacts to surface water quality as the amount of new impervious surface created would be much greater under the proposed project. Thus, in comparison, the No Project/No Development Alternative would result in fewer impacts such as increased surface runoff and degraded water quality.

- *Land Use and Planning.* Under this alternative, no change would occur to the existing conditions at the project site and an amendment to the General Plan to change the land use designation of the project site would be necessary. Because no change to the existing land use or land use plans and policies related to the project site would occur, this alternative would have no direct impact on land use at the site or in the vicinity.
- *Noise.* The No Project/No Development Alternative would not result in any change to existing ambient noise levels and would not introduce a new source of noise. Because no construction or business operations would take place short term construction noise would not occur. This alternative would result in no new noise impacts over that which presently exists. Therefore, the No Project/No Development Alternative would have fewer noise impacts compared to that anticipated for the proposed project.
- *Population/Public Services.* No changes in the Planning Area's service demand since no new development would occur. The existing vacant and blighted buildings could present a fire hazard and may be subject to vandalism. No housing would be displaced nor constructed under this alternative.
- *Transportation.* Under the No Project/No Development Alternative, the project-related increase in vehicle trips on the surrounding roadway network from proposed project construction and operation would not occur. The No Project/No Development Alternative would not result in changes to traffic, congestion on roadways, air traffic patterns, traffic hazards, inadequate emergency access, or inadequate parking. In addition, the No Project/No Development Alternative would not conflict with policies, plans, or programs supporting alternative transportation. As a result, the No Project/No Development Alternative would have no impact on transportation or traffic. Therefore, the No Project/No Development Alternative would have less traffic generation compared to the proposed project.
- *Utilities.* The No Project/No Development Alternative would not result in a new need for utilities at the project site. The proposed project would contribute toward increased sewer service demands beyond projected treatment capacity, thus requiring mitigation fees for expanding the capacity of the wastewater treatment plant. The No Project/No Development Alternative would have no new impact on water supplies, water or wastewater treatment facilities, new or existing storm water drainage facilities, or a substantial impact on solid waste facilities. Impacts to utilities and services would be fewer than that anticipated for the proposed project.

The No Project/No Development Alternative would avoid or substantially lessen some of the potential direct and cumulative significant impacts of the proposed project. However, this alternative would not

meet any of the project goals or objectives including the goals and objectives of the proposed project. The No Project/No Development Alternative would not provide the City with the social and economic benefits of expanded commercial facilities and amenities. The Area 2 and Area 3 portions of the Planning Area would remain in an undeveloped/underutilized state and would not help to meet the City's goals, as expressed in the project objectives. Because the No Project/No Development Alternative would not meet any of the project objectives, it is considered to be infeasible.

5.4.2 ALTERNATIVE 2: RESIDENTIAL DEVELOPMENT ALTERNATIVE

Under this Alternative, a residential development within the northeastern portion of Area 1 would be constructed where one of the hotels are currently proposed. The residential development would consist of six levels with 96 market rate units. The potential impacts of this alternative are described below.

- *Aesthetics.* The aesthetic and visible changes under the Residential Development Alternative would be in the northeastern portion of Area 1 where multi-story hotel structures are proposed. The six-level apartment building would be comparable in scale and mass to the proposed hotels. As a result, the impacts of this alternative would be comparable to those of the proposed project.
- *Air Quality.* The Residential Development Alternative would result in new short-term and long-term operational air pollutant emissions, including greenhouse gases. These emissions would occur as a result of development consistent with an industrial use. While overall traffic volumes associated with this alternative would be less than the proposed project, it is assumed that the vehicle miles travelled (VMT) would increase over the proposed project. It is anticipated that this alternative would have similar if not greater air quality impacts as compared to the proposed project. The potential residents would be exposed to airborne emissions from freeway traffic and the adjacent industries. In addition, the units would be located within 500 feet of the I-5 Freeway, which should be discouraged according to the SCAQMD.
- *Cultural Resources.* The impacts of the Residential Development Alternative would be the same as those envisioned for the proposed project. Both the proposed project and this alternative would potentially unearth other significant cultural resources. This alternative would involve substantial excavation and grading activities that could potentially disturb the subsurface. As with the proposed project, this alternative would require mitigation measures that address the accidental discovery of archaeological resources and/or previously unidentified human remains. Thus, the proposed project and the Residential Development Alternative would have similar impacts on cultural resources.
- *Greenhouse Gases.* The Residential Development Alternative would slightly decrease the amount of greenhouse gas emissions due to a reduction in traffic volumes. Retail generates a considerably larger number of vehicular trips than residential uses. Vehicular trips account for approximately 95% of the GHG emissions produced by the proposed project. However, the GHG emissions overall would remain significant.

- *Hazards and Hazardous Materials.* Under the Residential Development Alternative, future uses could potentially involve the use of hazardous materials though they would reflect those commonly used in a household setting. The Residential Development Alternative, like all proposed developments, would be required to comply with State laws and City Municipal Code restrictions that regulate and control the use of those materials handled on-site.
- *Hydrology and Water Quality.* Development under the Residential Development Alternative would result in changes to hydrology and water quality from the site's current conditions. The Residential Development Alternative would result in impervious surfaces that would be comparable to the proposed project given the amount of paving required for parking, loading and access. Under this alternative, there would be similar impacts to the existing drainage patterns and to the volume of storm water runoff when compared to the proposed commercial center project. This alternative would have similar impacts to hydrology and surface water quality as compared to the proposed project.
- *Land Use and Planning.* Under the Residential Development Alternative, a small portion of Area 3 would be developed as 96 market units. Both a zone change and a General Plan Amendment would be required to accommodate the residential development use. Therefore, the Residential Development Alternative would have greater impacts related to land use plans and policies, given its consistency with the existing General Plan land use designation, than the proposed project.
- *Noise.* The Residential Development Alternative is a sensitive receptor and the future residents would be exposed to high levels of noise. As a result, the potential noise exposure impacts would be greater under this alternative compared to that of the proposed project.
- *Population/Public Services.* Under this Alternative, a residential development within the northeastern portion of Area 1, would be constructed where one of the hotels are currently proposed. The residential development would consist of six levels with 96 market rate units. This development would result in public service impacts consistent with that envisions for residential development. However, this area of the City of Commerce is underserved by parks and school facilities that would normally be required for residential development.
- *Transportation.* With development under the Residential Development Alternative, an increase in vehicle trips on the surrounding roadway network could occur. However, this increase would not be as great as the projected increase from the proposed project. However, since traffic under this alternative would not increase to the same levels as with the proposed project, the Residential Development Alternative would require fewer improvements overall to the area's street network. Thus, the Residential Development Alternative would have fewer impacts regarding traffic and transportation than the proposed project.
- *Utilities.* This alternative would result in an overall impact that is comparable to that of the proposed project. As indicated previously, the area that would be occupied by the residential development is presently is occupied by less demand for wastewater treatment, electricity, gas, and

other service systems. Energy-saving measures included as part of the proposed project would also be included in this alternative, where applicable. Overall, the impacts of this alternative would be comparable to those of the proposed project.

5.4.3 ALTERNATIVE 3: INSTITUTIONAL/OFFICE ALTERNATIVE (AREA 3).

The Institutional/Office Alternative would result in less developed space at the retail commercial center. Under the Institutional/Office Alternative, the retail commercial center would not exceed 60 percent of the development proposed as part of the project. The potential impacts of this alternative are described below.

- *Aesthetics.* Under this Alternative, Pad 5 would be developed as a four level, 70,000 square foot office building. The potential aesthetic and visual impacts would be comparable to that of the proposed project. No changes would occur to Areas 1 and 2. The only visual change would be to the Pad 5 located in Area 3.
- *Air Quality.* The proposed project would result in significant and unavoidable air quality impacts during construction (ROG) and cumulative air quality criteria pollutants impacts. The Institutional/Office Alternative would also result in significant and unavoidable impacts to air quality. As with the proposed project, this alternative would also result in significant cumulative air impacts. As a result, the impacts of this alternative would be comparable to those of the proposed project.
- *Cultural Resources.* No cultural resources have been identified within the Planning Area. As with the proposed project, this alternative would require the same mitigation measures that address the accidental discovery of archaeological resources and/or previously unidentified human remains. The Institutional/Office Alternative would therefore have similar impacts as the proposed project.
- *Greenhouse Gases.* The proposed project would result in the release of GHG emissions. The Institutional/Office Alternative would likely also result in some impacts regarding GHG emissions, both for construction and operations, and its cumulative contribution. The potential GHG impacts of this alternative would be comparable to those of the proposed project.
- *Hazards and Hazardous Materials.* The Institutional/Office Alternative would result in new construction at the project site that would result in soil disturbance, excavation, and trenching similar to that of the proposed project). Soil disturbance could result in exposing construction workers to the same potential hazards and hazardous materials identified for the proposed project. These potential hazardous materials include pesticides and herbicides in the soil. Similar to the proposed project, this alternative would result in the use and disposal of small amounts of commercial hazardous products (cleaners, solvents) but to a lesser degree. As a result, the impacts of this alternative would be comparable to those of the proposed project.
- *Hydrology and Water Quality.* As with the proposed project, the Institutional/Office Alternative would result in a comparable amount of impervious surface area to that of the proposed project. Under this alternative, the impacts to the existing drainage patterns and to the volume of storm

water runoff would be comparable to that of the proposed project. A comprehensive surface drainage/storm drain system would still have to be developed to collect and convey runoff from the project site. The same and or similar mitigation measures required for the proposed project would also be required for this alternative to reduce non-point source pollution in storm water runoff.

- *Land Use and Planning.* Similar to the proposed project, this alternative would not physically divide an established community or conflict with habitat conservation plans or natural community conservation plans. This alternative would still require a General Plan amendment and rezoning to allow for potential institutional use. As a result, the impacts of this alternative would be comparable to those of the proposed project.
- *Noise.* The contribution of the Institutional/Office Alternative to ambient noise levels and to cumulative noise increases would be comparable to that of the proposed project. The traffic volumes would not be great enough to translate into a perceptible change in traffic noise volumes. As a result, the impacts of this alternative would be comparable to those of the proposed project.
- *Population/Public Services.* This alternative would not displace any existing housing or involve the construction of any new housing. The law enforcement and fire department service demands would be comparable to that of the proposed project. Overall, the impacts of this alternative would be comparable to those of the proposed project.
- *Transportation.* Under the Institutional/Office Alternative, an increase in vehicle trips on the surrounding roadway network would occur. This increase would result in more new peak hour trips associated with employees travelling to and from work. Overall, changes in traffic patterns would be similar to those associated with proposed project operations, and many of the associated project-specific mitigation measures would still be required. As a result, the impacts of this alternative would be comparable to those of the proposed project.
- *Utilities.* Development under the Institutional/Office Alternative would result in a utility demand rate that is comparable to that of the proposed project. The water and effluent generation would be greater than that anticipated for a restaurant use on Pad 5. As a result, the impacts of this alternative would be comparable to those of the proposed project.

In general, the Institutional/Office Alternative would result in similar impacts on the environment than the proposed project for all resource areas considered in the analysis. This alternative also would meet all the goals and objectives of the proposed project; however, the revenue generated would be proportionally less than that of the proposed project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR must identify the environmentally superior alternative. The Institutional/Office Alternative would represent the most environmentally superior alternative compared to the other alternatives. In addition, it is the only alternative that would meet all of the project objectives. The No Project/No Development Alternative would be environmentally inferior in that the existing blight and environment conditions for Area2 and Area 3 would remain unchanged. Furthermore, the No Project/No Development Alternative does not meet any of the project objectives. In addition, *CEQA Guidelines* (Section 15126.6(c)) require that, if the environmentally superior alternative is the No Project/No Development Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As provided in Section 15126.6(d) of the *CEQA Guidelines*, the significant effects of each alternative are identified in less detail than the proposed project. A summary comparison of the potential impacts associated with the alternatives and the proposed project is provided in Table 5-1 below.

**Table 5-1
Comparison of Project Alternative Impacts to Project Impacts**

No Development/No Project Alternative	Residential (Area 1) Alternative	Office/Institutional (Area 3) Alternative
Aesthetic Impacts		
Greater than project impacts	Greater than project impacts	Less than project impacts.
Air Quality Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
Cultural Resources Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
GHG Impacts		
Less than project impacts.	Greater than project impacts.	Same as project impacts.
Hazards and hazardous Materials Impacts		
Greater than project impacts.	Same as project impacts..	Same as project impacts.
Hydrology and Water Quality Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
Land Use Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
Noise Impacts		
Less than project impacts.	Greater than project impacts	Same as project impacts.

Table 5-1
Comparison of Project Alternative Impacts to Project Impacts

No Development/No Project Alternative	Residential (Area 1) Alternative	Office/Institutional (Area 3) Alternative
Transportation and Circulation Impacts		
Less than project impacts.	Same as project impacts	Same as project impacts.
Utilities Impacts		
Less than project impacts.	Same as project impacts	Same as project impacts.

Source: Blodgett Baylosis Environmental Planning.



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SECTION 6.0 REFERENCES

6.1 PREPARERS

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 South Hacienda Boulevard, Suite 107
Hacienda Heights, California
(626) 336-0033

Marc Blodgett, Principal/Project Manager
Bryan Hamilton, Project Planner
Liesl Sullano, Project Planner

6.2 REFERENCES

Documents may be viewed at the City of Commerce, Public Works and Development Services Department, Planning Division at 2535 Commerce Way, Commerce, California 90040. *Please note the references consulted as part of the Draft EIR's preparation are identified using footnotes. The URLs are identified for those online sources while the printed sources are maintained in a repository at the Planning Division in City Hall.*

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