

**FINDINGS OF FACT AND STATEMENT OF OVER-RIDING
CONSIDERATIONS
FOR THE
FINAL ENVIRONMENTAL IMPACT REPORT
SCH# 2016091024
CITADEL OUTLETS EXPANSION & 10-ACRE DEVELOPMENT
PROJECT
COMMERCE, CALIFORNIA**

INTRODUCTION

The City Council of the City of Commerce (“City”) hereby makes the following Findings of Fact concerning the Final Environmental Impact Report (SCH #2016091024) for the Citadel Outlets Expansion and 10-Acre Development Project (“Project”), pursuant to the California Environmental Quality Act, Public Resources Code § 21000, *et seq.* (“CEQA”), and its implementing regulations, California Code of Regulations, title 14, § 15000, *et seq.* (“CEQA Guidelines”).

The Final Environmental Impact Report (“Final EIR”) prepared for the Project consists of a single volume that includes the following: a copy of the Draft EIR that includes an executive summary, a project description, a description of the environmental setting, an analysis of the environmental impacts, the listing of mitigation measures for the Project, a list of public agencies, organizations and persons commenting on the Draft EIR, comments received on the Draft EIR and the City’s responses to those comments, the clarification and errata for the Draft EIR, and the appendices containing the Initial Study, the air quality analysis worksheets, noise prediction model, and traffic study and all other information required by CEQA Guidelines section 15132. The Mitigation Monitoring and Reporting Program (MMRP) were provided under a separate cover.

The environmental effects, proposed mitigation measures, and alternatives analyzed in the Draft EIR, and the public comments and responses thereto contained in the Final EIR, have influenced the design of the Project. These environmental documents and procedures reflect the City’s commitment to incorporate the environmental considerations identified during the CEQA process into the final project design.



1.0 PROJECT DESCRIPTION

1.1 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. 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.

1.2 PROJECT COMPONENTS

1.2.1 PROJECT APPLICANT.

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.

1.2.2 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. A second six-level parking structure consisting of 630 stalls will also be constructed.
- *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.
- *Loft Hotel* will be constructed south of the Traveler’s Hotel 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 new *Hotel and Parking Structure* will be located in the northeastern portion of Area 2. 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. 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.

1.3 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.



2.0 ENVIRONMENTAL PROCEDURES AND FINDINGS UNDER CEQA

2.1 LEAD AGENCY

Pursuant to CEQA Guidelines §15367, the City is the “lead agency” for the purpose of preparing the environmental review required by CEQA. The environmental review prepared by the City will be used by the Commerce City Council in its decisions regarding the following actions associated with the Project. 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 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.

2.2 ENVIRONMENTAL IMPACT REPORT

Pursuant to CEQA Guidelines §15080, *et seq.*, the City prepared an Environmental Impact Report (“EIR”) to analyze the potential impacts of the Project on the environment. The Final EIR consists of five volumes which contain all of the information required by CEQA Guidelines section 15132, including the Draft EIR, the appendices to the Draft EIR, and the comments on the Draft EIR and the Lead Agency’s responses to those comments.

2.3 PUBLIC PARTICIPATION

Environmental review of the Project began on October 22, 2018 with the publication of a Notice of Preparation (NOP) of the EIR and a 30-day public review period. The Draft EIR was completed and made available for public review on March 27, 2019. The 45-day public review period required by CEQA began on March 27, 2019, and ended on May 10, 2019. 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 Druary, 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.

The comment letters and the Lead Agency’s responses are included in Volume 4 (Comments on DEIR, and the Lead Agency’s Responses) of the Final EIR. The comments on the Draft EIR and the City’s responses to them are included in the Final EIR as required by CEQA Guidelines sections 15088 and 15132. The Final EIR was completed and the City’s responses to comments were made available for review on June 20, 2019. Public hearing concerning certification of the Final EIR and approval of the Project were held by the City Council on July 2, 2019, at which interested agencies, organizations, and persons were given an additional opportunity to comment on the Final EIR and the Project.

2.4 RECORD OF PROCEEDINGS

For purposes of CEQA and the findings set forth below, the administrative record of the City’s decision concerning certification of the Final EIR for the Project shall include the following:

- The Draft EIR including the appendices (dated March 15, 2019);
- The Final EIR including the appendices (dated June 20, 2019);
- All documents and other materials listed as references and/or incorporated by reference in the Draft EIR and Final EIR;
- All reports, applications, memoranda, maps, letters, and other documents prepared by the City’s staff and consultants for the Project which are before the City Council as determined by the Clerk;
- All documents or other materials submitted by interested persons and public agencies in connection with the Draft EIR and the Final EIR;

- The minutes, tape recordings, and verbatim transcripts, if any, of the public hearings held by the Planning Commission and the City Council concerning the Final EIR and the Project; and
- Matters of common knowledge to the City, including but not limited to the Commerce General Plan.

The custodian of the documents and other materials comprising the administrative record of the City's decision concerning certification of the Final EIR is the City Clerk of the City of Commerce. The location of the administrative record is the Clerk's office at the Commerce City Hall, 2535 Commerce Way, Commerce, California 90040.

2.5 PURPOSE OF FINDINGS UNDER CEQA

CEQA requires the City to make written findings of fact for each significant environmental impact identified in the Final EIR (CEQA Guidelines §15091). The purpose of the findings is to systematically restate the significant effects of the Project on the environment and to determine the feasibility of mitigation measures and alternatives identified in the Final EIR which would avoid or substantially lessen the significant effects. Once it has adopted sufficient measures to avoid or substantially lessen a significant impact, the City is not required to adopt every mitigation measure identified in the Final EIR or otherwise brought to its attention. If significant impacts remain after application of all feasible mitigation measures, the City must review the alternatives identified in the Final EIR and determine if they are feasible. These findings set forth the reasons, and the evidence in support of, the City's determinations.

2.6 TERMINOLOGY

A "finding" is a written statement made by the City which explains how it dealt with each significant impact and alternative identified in the Final EIR. Each finding contains an ultimate conclusion regarding each significant impact, substantial evidence supporting the conclusion, and an explanation of how the substantial evidence supports the conclusion. For each significant effect identified in the Final EIR, the City is required by CEQA to make a written finding reaching one or more of the following conclusions:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effect identified in the EIR;
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; or
- (3) Specific legal, economic, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR (CEQA Guidelines §15091(a)).

A mitigation measure or an alternative is considered "feasible" if it is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental,

legal, social and technological factors (CEQA Guidelines §15364).

2.7 LEGAL EFFECT

To the extent these findings conclude mitigation measures identified in the Final EIR are feasible and have not been modified, superseded or withdrawn, the City hereby binds itself and any other responsible parties, including the Project Applicant and their successors in interest, to implement those mitigation measures. These findings are not merely informational, but constitute a binding set of obligations upon the City, the Project Applicant and responsible parties, which will take effect if and when the City adopts a resolution certifying the Final EIR and the City and/or the responsible agencies adopt resolution(s) approving the Project.

2.8 MITIGATION MONITORING AND REPORTING PROGRAM

In adopting these findings, the City also adopts a mitigation monitoring and reporting program pursuant to Public Resources Code §21081.6. This program is designed to ensure the Project complies with the feasible mitigation measures identified below during implementation of the Project. The program is set forth in the “Citadel Outlets Expansion and 10-Acre Development Project Mitigation Monitoring and Reporting Program,” which is adopted by the City concurrently with these findings and is incorporated herein by this reference.



3.0 FINDINGS REGARDING DIRECT SIGNIFICANT EFFECTS

The Project will result in direct significant environmental effects with respect to Air Quality, Greenhouse Gas Emissions, and Traffic and Circulation. These significant environmental effects, and the mitigation measures identified to avoid or substantially lessen them, are discussed in detail in The Final EIR and in Sections 3.2 (Air Quality), 3.4 (Greenhouse Gas Emissions), and 3.11 (Traffic and Circulation). A summary of significant impacts and mitigation measures for the Project is set forth in the Final EIR. Set forth below are the findings regarding the potential direct significant effects of the Project. The findings incorporate by reference the discussion of potential significant impacts and mitigation measures contained in the Final EIR (refer to Section 3). The Final EIR, which includes the Draft EIR and appendices, is referred to in the findings below as the “EIR.”

3.1 AESTHETIC IMPACTS

3.1.1 THE PROPOSED PROJECT’S POTENTIAL FOR AN ADVERSE EFFECT ON A SCENIC VISTA.

FINDING 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. 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.

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.

3.1.2 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.

FINDING OF IMPACT ANALYSIS. There are no designated State scenic highways located in the vicinity of the project site. 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 will not affect any trees, outcroppings, or historic resources. The project sites have already undergone development and there are no natural topographic features remaining.

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.

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

FINDING OF IMPACT ANALYSIS. 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 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.

FINDING 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. 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.

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.

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

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

FINDING OF IMPACT ANALYSIS. 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: *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. 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.

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.

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

FINDING OF IMPACT ANALYSIS. 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 projected long-term emissions would exceed SCAQMD thresholds for Reactive Organic Gases (ROG) and NOx. NOx emissions are generated from the exhaust of mobile sources and these gases are precursors to ozone. Since the project will result in an exceedance in mobile sourced ROG, and NOx, mitigation measures have been provided to encourage the use of alternative forms of transportation.

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 NOx.

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 recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR.

SCAQMD Mitigation Measure a. Require construction contractor(s) to use offroad 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 NOx. 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.

3.2.3 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).

FINDING OF IMPACT ANALYSIS. Once operational, the project will result in an exceedance in ROG and NOx, which are two compounds that are known as ozone precursors. 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 and NOx 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.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION. As indicated in the previous subsection, the project would exceed the SCAQMD's operational thresholds for ROG and NOx.

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 NOx.

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 and 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 air quality impacts.

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

FINDING OF IMPACT ANALYSIS. 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, 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 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. 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.

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

FINDING 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. 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.

3.3 CULTURAL RESOURCES IMPACTS

3.3.1 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.

FINDING 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. The initial development and the subsequent improvements that have occurred over the years has 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. 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.

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

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

FINDING OF IMPACT ANALYSIS. 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 31,141 MTCO₂E/year. 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.

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

FINDING OF IMPACT ANALYSIS. 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.

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 with the existing CARB Programs. 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

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

FINDING OF IMPACT ANALYSIS. The use of construction best management practices (BMPs) typically implemented as part of construction activities are required by the Storm Water Pollution Prevention Plan. 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. 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. The potential risks posed by the use and storage of these hazardous materials are primarily limited to the immediate vicinity of the materials.

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.

3.5.2 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.

FINDING OF IMPACT ANALYSIS. Given the commercial 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. During demolition 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

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

FINDING OF IMPACT ANALYSIS. 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.

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.

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

FINDING OF IMPACT ANALYSIS. Grading related activities are not anticipated to deplete groundwater supplies from any underlying aquifer or interfere with any groundwater recharge activities. 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. 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. 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).

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

FINDING 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. 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 alter 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.

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

FINDING OF IMPACT ANALYSIS. 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 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.

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

FINDING OF IMPACT ANALYSIS. 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. 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.

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.

3.6.6 PROJECT'S POTENTIAL FOR SUBSTANTIALLY DEGRADING WATER QUALITY.

FINDING OF IMPACT ANALYSIS. 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. 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. 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 SWPPP) 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 SWPPP 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

3.7.1 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.

FINDING 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 from 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, the development site must be zoned CPF (Commercial Public Facility Zone) to allow for the proposed use. 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.

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

3.8.1 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.

FINDING 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. 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. The line-of-sight between the aforementioned neighborhood and the Planning Area is 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.

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.

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

FINDING OF IMPACT ANALYSIS. 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. 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.

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.

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

FINDING 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. 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). 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.

POTENTIALLY SIGNIFICANT IMPACTS BEFORE MITIGATION. The proposed project will generate additional vehicle traffic that 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 A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT.

FINDING 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 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

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

FINDING OF IMPACT ANALYSIS. Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. 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.

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 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.

FINDING 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.

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.

3.10.2 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.

FINDING OF IMPACT ANALYSIS. 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

3.11.1 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.

FINDING OF IMPACT ANALYSIS. The traffic analysis made the following determination with respect to the proposed project's traffic impacts:

- 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.
- Under *Existing with Project Conditions (Year 2018)*, 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.

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:

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

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.

The following is a description of the feasible proposed intersection mitigation measures:

- *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. *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. *Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.*
- *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. *Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.*

Under Future with Truck Traffic with Project Conditions (Year 2025), additional physical improvement measures are required at the following intersection:

- *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. *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.*

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:

- 11. Atlantic Boulevard & Telegraph Road;
- 12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road; and,
- 17. I-5 Ramps/Commerce Casino & Telegraph Road.

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.

3.11.2 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.

FINDING OF IMPACT ANALYSIS. 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. 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. The nearest mainline freeway monitoring location to the project site is I-5 at Ferris Avenue, approximately one mile northwest of the project site.

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.

3.11.3 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.

FINDING 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.

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 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).

FINDING OF IMPACT ANALYSIS. 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. The traffic study indicated 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. 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 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.

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.

3.11.5 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.

FINDING 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. TSM contributions by the project would help pay for traffic signal system enhancements in the study area. 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.

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.

3.12 UTILITIES IMPACTS

3.12.1 THE PROPOSED PROJECT'S POTENTIAL FOR EXCEEDING WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD.

FINDING 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. The proposed new development within the planning area is projected to generate 133,018 gallons of waste water on a daily basis. 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 the aforementioned Water Reclamation Plant without needing to expand treatment capacity. The 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.

3.12.2 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.

FINDING OF IMPACT ANALYSIS. The new development 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 acre feet per year which would represents 0.97 percent of the total projected 2020 supplies.

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.

3.12.3 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.

FINDING 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.

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 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.

FINDING 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.

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.

3.12.5 THE PROPOSED PROJECT'S POTENTIAL FOR RESULTING IN AN OVERCAPACITY OF THE STORM DRAIN SYSTEM, CAUSING AREA FLOODING.

FINDING OF IMPACT ANALYSIS. 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 connected to the local flood control and storm drain system.

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.

3.12.6 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

FINDING 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 the aforementioned Water Reclamation Plants without needing to expand treatment capacity. Therefore, 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.

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.

3.12.7 THE PROPOSED PROJECT'S POTENTIAL FOR UTILIZING A LANDFILL WITH INSUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS.

FINDING 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. The proposed new development within the planning area is projected to generate 42,939 pounds of solid waste per day.

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.

3.12.8 THE PROPOSED PROJECT'S POTENTIAL FOR NON-COMPLIANCE WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE.

FINDING OF IMPACT ANALYSIS. The proposed 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.



4.0 OTHER CEQA FINDINGS

4.1 CUMULATIVE IMPACTS

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 of the Final EIR, was provided by the City of Commerce working with the project traffic engineer. As indicated in the Final EIR, 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.

4.2 SIGNIFICANT & UNAVOIDABLE IMPACTS

The environmental analysis contained in Section 3 of the of the Final 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. 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 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.
- *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.

4.3 PROJECT ALTERNATIVES

The Final 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. 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.



5.0 STATEMENT OF OVERRIDING CONSIDERATIONS

The City of Commerce, in its capacity as Lead Agency and decision-maker for the project, has reviewed and considered the information contained in the environmental impact report (EIR) prepared for the proposed Citadel Outlets Expansion Project and 10-Acre Development Site (SCH 2016091024) and the public record. The Lead Agency makes the following findings, pursuant to Section 15093 of the California Environmental Quality Act (CEQA) Guidelines, with respect to the Statement of Overriding Considerations for the proposed project:

- *Construction Air Quality Impacts.* The EIR determined that 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 this Statement of Overriding Considerations with respect to air quality impacts.
- *Operational Air Quality Impacts.* The EIR determined that the proposed project would generate operational emissions that would still exceed the thresholds for ROG and NO_x. As a result, the City of Commerce in its capacity as Lead Agency for the project would be required to adopt this Statement of Overriding Considerations with respect to air quality impacts.
- *Greenhouse Gas Impacts.* The EIR determined that the project-related operational emissions (direct and indirect) would result in 31,141MTCO₂e/year. 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 this Statement of Overriding Considerations with respect to air quality 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 this Statement of Overriding Considerations with respect to air quality impacts.
- *Cumulative Air Quality Impacts.* The EIR determine the project, together with other cumulative projects in the area would result in a cumulatively considerable net increase of certain criteria pollutants for which the region is classified as non-attainment. 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 this Statement of Overriding Considerations with respect to 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. 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 this Statement of Overriding Considerations with respect to air quality impacts.

In further consideration of the potentially significant impacts from the proposed project, the Lead Agency's determination in the consideration of the Statement of Overriding Considerations includes the following:

- Any future infill development, including those that might involve uses other than the proposed project, would likely generate traffic, air emissions, and GHG impacts comparable to that anticipated for the proposed project.
- A substantial portion of Area 1 and Area 2 is currently vacant and underutilized. The current blighted and underutilized state of these areas do not contribute employment or revenue to the City.
- The proposed project's operational emissions will be comparable to that projected from the previous use. While CEQA did not permit the consideration of the previous industrial use in the air quality analysis, the net contribution of emissions from the proposed project will be less when subtracting the operational emissions from the previous use.
- The proposed project is generally consistent with the applicable Zoning and General Plan designations for the larger planning area. As a result, the proposed project is consistent with the City of Commerce General Plan's vision for the area, the SCAG Growth Management Plan, and past redevelopment plans.
- The construction and operation of the proposed project will employ best management practices (BMPs) and be required to adhere to all pertinent protocols of the SCAQMD, the California Air Resources Board (CARB), and the United States Environmental Protection Agency (USEPA).
- The proposed project will provide both construction related and long-term employment in the City. Approximately 1,750 new long-term local jobs will be provided.
- The proposed project will contribute to the City's General Fund through sales tax revenue, hotel occupancy taxes, and property taxes.
- The City may be provided a new City Hall, Public Safety Facility, or other public facility as part of the proposed project's implementation.

