



**ADDENDUM TO THE  
MITIGATED NEGATIVE DECLARATION & INITIAL STUDY  
PREPARED FOR THE  
TROJAN STORAGE PROJECT, 6210 GARFIELD AVENUE**

**1. INTRODUCTION**

Pursuant to Section 15164 of the CEQA Guidelines, the City of Commerce, Public Works and Development Services Department, Planning Commission ("Planning Commission") has prepared this Addendum to the Initial Study & Mitigated Negative Declaration ("IS/MND"), dated May 24, 2019, and prepared by Blodgett Baylosis Environmental Planning (BBEP) for the Trojan Storage Project at 6210 Garfield Avenue ("Project").

This Addendum identifies a number of minor technical changes made to the IS/MND based on additional information regarding soil conditions associated with the site's current and previous industrial use, as previously evaluated in the following technical documents:

- Phase I Environmental Site Assessment [prepared for] 6210 Garfield Avenue, Commerce, California. AEI Consultants, July 3, 2018 ("Phase I").
- Limited Phase II Subsurface Investigation [prepared for] 6210 Garfield Avenue, Commerce, California. AEI Consultants, September 21, 2018 ("Limited Phase II").
- Soil Management Plan [prepared for] 6210 Garfield Avenue, Commerce, California. AEI Consultants, November 15, 2018 ("SMP").

Each of the technical documents referenced above (collectively, the "Soil Reports") were prepared and reviewed by Blodgett Baylosis and Planning Commission staff prior to the Planning Commission's July 30, 2019 approval of Plot Plan No. 992 and Conditional Use Permit ("CUP") No. 553 for the Project. While not expressly referenced in the IS/MND, BBEP relied upon the data, findings and recommendations of the Soil Reports to prepare the IS/MND. Similarly, while not expressly referenced in the Staff Report prepared for the Planning Commission prior to the July 30, 2019 special meeting, Planning Commission staff reviewed and relied upon the Soil Reports prior to recommending that the Planning Commission approve the Plot Plan and CUP for the Project.

This Addendum seeks to clarify and offer further support for the original conclusion of the IS/MND that the Project will not result in any impacts on human health or the environment due to soil conditions at project site (either during project construction or operation). The findings of the Soil Reports are incorporated by reference herein, and are discussed further in Section 5. In addition to these minor technical revisions, this Addendum also discusses and incorporates additional mitigation measures for the Project related to demolition and grading activities. These mitigation measures were previously recommended in the SMP, and relate to impacts previously found to be insignificant without mitigation in the IS/MND. These mitigation measures included in the SMP reflect the standard South Coast Air Quality Management District



(SCAQMD) regulations largely designed to control fugitive dust. The measures are identified in the IS/MND.

Section 15164 of the California Environmental Quality Act (“CEQA”) Guidelines permits a lead agency to adopt an addendum to a previously adopted negative declaration in the following situations:

- The lead agency shall prepare an addendum if only minor technical changes or additions are necessary, and none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred;
- An addendum need not be circulated for public review, but can be included in or attached to the final CEQA document;
- The decision-making body (in this instance, the Commerce City Council) shall consider the addendum with the final CEQA document prior to making a decision on the project; and,
- A brief explanation of the decision not to prepare a subsequent CEQA document pursuant to Section 15162 should be included in an addendum, the Lead Agency’s Findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As discussed below, none of the circumstances in CEQA Guidelines section 15162 has occurred because the technical information contained in the Phase I, Limited Phase II, and SMP reports do not identify a new or substantially more severe environmental impact under CEQA. Because the technical revisions and new information addressed herein do not trigger any of the conditions warranting a subsequent negative declaration, an Addendum is proper.

CEQA Guidelines section 15164 does not require circulation of addenda. However, to foster informed decision-making and public participation surrounding the Project, City staff will circulate this Addendum together with the IS/MND to all interested parties. **This Addendum will be posted on the Planning Commission’s website on September 26, 2019.** Copies of the Phase I, Phase II, SMP, and the updated Mitigation Monitoring and Reporting Program (MMRP) will also be made available for public view at the Planning Counter, Civic Center Library, and the Planning Commission’s website.

## **2. PROJECT LOCATION AND SETTING**

The project site is located in the southeastern 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. Regional access to the City is provided by the Santa Ana Freeway (I-5) and the Long Beach Freeway (I-710). The project site’s legal address is 6210 Garfield Avenue. The site’s corresponding Assessor Parcel Numbers include 6357-001-050 and 6357-001-051.



The project site is located in the midst of an industrial area located in the southern portion of the City. A Southern Pacific Railroad right-of-way extends along the project site's northern property line. A Prologis warehouse is located further north of the aforementioned railroad. The project site is bounded to the south by a swap meet, Mount Carmel Cemetery, and Park Lawn Cemetery. A single-family residential neighborhood is located to the east of the project site. Garfield Avenue extends along the west side of the project site. A Southern California Edison substation occupies frontage along the west side of Garfield Avenue, opposite the project. The project site is currently occupied by Eddie Kane Steel Products, Inc. The site is occupied by four main buildings and ancillary structures. The western portion of the site is paved while the eastern portion not occupied by building, is unpaved. The existing buildings have a total floor area of 237,372 square feet.

### **3. PROJECT DESCRIPTION**

The proposed Project involves the construction of a self-storage facility within a 5.39-acre (234,788 square feet) site. The project site has a maximum lot depth (west to east) of 2,493 feet and a maximum lot width (north to south) of 133 feet. The proposed development will have a lot coverage of 48% and a floor area ratio (FAR) of 0.90 to 1.0. The Project will consist of two buildings (referred to herein as Buildings A and B).

The main building, Building A, will consist of two stories and will have a total floor area of 197,000 square feet. The first floor will total 96,567 square feet while the second floor will total 100,433 square feet of floor area. Building A will also include 1,155 square feet of office space on the first floor and a 1,155 square feet residence for an on-site manager on the second floor. This building will be located within the northwest portion of the project site. A total of 1,300 individual storage units are proposed. Building B will consist of a single story structure totaling 14,330 square feet. This building will be located in the eastern half of the project site.

A total of 18 parking spaces will be provided for the public and employee parking. The public parking stalls will be located in the western portion of the site next to the office and in the eastern portion of the site. In addition, a total of 33 parking spaces will be provided for R.V. storage in the eastern portion of the property. Vehicular access to the project site will be permitted by a new driveway apron located along the east side of Garfield Avenue. The new driveway will be located in an area occupied by the existing driveway.

The construction phase for the proposed Project would take approximately eleven months to complete. Once operational, the leasing office will be open from 9:00 AM to 6:00 PM Monday through Saturday and 10:00 AM to 5:00 PM on Sunday, with an on-site manager, who will be an employee of Trojan Storage. The proposed business will employ approximately 13 employees though no more than two employees will be on-site at any given time. Each storage unit will be individually alarmed and the entire facility will be monitored by 24-hour surveillance cameras. A full-time caretaker will reside on-site at all times. In addition, computer coded gate access will control who can enter the facility.



#### 4. OVERVIEW OF PREVIOUS ENVIRONMENTAL REVIEW

The IS/MND was prepared to analyze the environmental impacts associated with the approval and subsequent implementation of the proposed Project. Circulation of the IS/MND commenced on June 10, 2019 with the filing of the Notice of Intent to Adopt at the Los Angeles County Clerk. Based on the findings of the IS/MND, the City of Commerce Planning Division, acting as lead agency for the proposed undertaking, determined that the proposed Project would not result in any significant adverse environmental impacts.

#### 5. PURPOSE OF THIS ADDENDUM

Following the circulation of the IS/MND, additional information was provided to enhance and clarify the discussion of soil conditions of the property previously analyzed in *Section 3.9, Hazards & Hazardous Materials*. In addition to relying on the Soil Reports, the IS/MND expressly relied on information obtained from the following regulatory agencies:

- California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). DTSC's Hazardous Waste and Substances Site List - Site Cleanup [Cortese List]. ([http:// www. dtsc. ca. gov /SiteCleanup /Cortese List](http://www.dtsc.ca.gov/SiteCleanup/CorteseList)).
- California Water Resources Control Board. (*GeoTracker*. [https:// geotracker. waterboards. ca. gov](https://geotracker.waterboards.ca.gov))
- United States Environmental Protection Agency. *List of EPA - Regulated Facilities in Envirofacts*. and *Multisystem Search*.
- California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. (*Well- finder Database*.)

As indicated in the Introduction, Planning Commission staff determined that the IS/MND would benefit from clarifying the scope of the administrative record describing and assessing the condition of the existing site conditions of the property. The Soil Reports previously prepared focus extensively on soil conditions related to the historic use of the site by the current and previous occupants.

Subsurface investigations undertaken in conjunction with the Limited Phase II analyzed soil samples at the property for petroleum hydrocarbons (TPH-cc), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs) and Title-22 metals. Petroleum hydrocarbons, VOCs, and PCBs were not detected in the soil samples collected from a depth of 1 foot below ground surface. Although the Limited Phase II identified lead and arsenic as chemicals of potential concern, the SMP concluded that certain soil containing elevated concentrations of arsenic and lead “may be disposed of either within or outside of California as non-hazardous soil,”<sup>1</sup> and that certain soil exhibiting elevated levels of lead could be classified as non-RCRA hazardous waste.<sup>2</sup>

A soil management plan (SMP) was prepared for the Project site to “reduce the potential for direct contact exposure from these constituents in soil.” The SMP concluded that if asphalt,

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<sup>1</sup> Soil Management Plan at 3.

<sup>2</sup> *Id.* at 4.





concrete, or building foundations are destroyed or removed during demolition and/or construction activities, “non-soil debris must be removed from the Site. In addition, any and all excavated impacted soil exceeding regulatory screening levels must be handled.”<sup>3</sup> The SMP included a number of recommendations that future developers (including Trojan) should follow during the demolition of the existing buildings. Because the Project will involve demolition activities of the existing buildings, the following recommendations of the SMP are hereby *added as new* Mitigation Measures included in the IS/MND.

*New Mitigation Measure No. 1.* The excavation of site soil shall be managed using methods consistent with the protection of human health and the environment in accordance with applicable Federal, State, and local laws and will include preparation of a health and safety plan (HASP) and the use of appropriately trained personnel.

*New Mitigation Measure No. 2.* Access to the excavation work area shall be controlled by the contractor using fencing where applicable, or signs, barricades, and barrier tape.

*New Mitigation Measure No. 3.* When engaging in activities that generate dust, such as demolition, grubbing, and/or excavating, workers’ personal protective equipment (PPE) shall consist of long pants, high-visibility safety vest, hard hat, long-sleeved work shirt, safety glasses, gloves, and a dust (particulate) filtering facepiece mask (N95) covering the nose and mouth when excavating the arsenic and lead impacted soils within 30 feet of and among the B-1, B-2, B-3, and B-9 boring locations.

*New Mitigation Measure No. 4.* Dust control measures shall be implemented to minimize dust which may be carried by wind or inhaled by on-Site personnel. The excavated material will be sufficiently moistened so as to prevent the generation of dust, but not so wet that standing water is present in the excavation area. The Contractor shall adhere to all appropriate requirements for monitoring fugitive dust and documentation in accordance with Rule 403 (1466 Dust Monitoring) issued by the Southern California Air Quality Management District (SCAQMD).

*New Mitigation Measure No. 5.* At the end of each work day, all streets, sidewalks, paths, and intersections where work occurred will be swept or vacuumed to remove visible soil.

*New Mitigation Measure No. 6.* The material contained in all loading trucks or metal bins carrying excavated material will be maintained below the sides and back of the truck or bin and will be properly covered to avoid dust and soil drying during transport. Excavated materials may be moistened prior to transport.

*New Mitigation Measure No. 7.* Drop heights will be minimized while loading/unloading soil.

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<sup>3</sup> *Id.* at 5.



*New Mitigation Measure No. 8.* Soil segregated for further characterization (laboratory analysis) and/or potential disposal shall be temporarily stockpiled on and covered with plastic sheeting. The soil shall be stored in a manner so as to prevent contact with the ground, or infiltration from precipitation or storm water runoff.

*New Mitigation Measure No. 9.* Excavation equipment and vehicles shall be cleaned on-site to prevent the off-site tracking of potentially impacted soil.

**The above new mitigation measures will be incorporated into the Mitigation Monitoring and Reporting Program (MMRP), a revised version of which is attached at Exhibit A.**

The IS/MND (Section 3.3.3) indicates that impacts from fugitive dust and particulates would be reduced through the implementation of the standard SCAQMD regulations, including the following:

- *SCAQMD Rule 402* prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- *SCAQMD Rule 403* governs fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source.
- *SCAQMD Rule 1113* governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. As of January 1, 2014, VOC content in architectural coatings will be limited to no more than 50 grams per liter. Therefore, all paints and solvents used during construction of the project must comply with SCAQMD Rule 1113.
- *SCAQMD Rule 1143* governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction.
- *SCAQMD Rule 1186* limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.



- *SCAQMD Rule 1303* governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM<sub>10</sub> among other pollutants.
- *SCAQMD Rule 1401*, New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants (TACs).

All pertinent SCAQMD Rules are standard conditions required for every construction project undertaken in the City as well as in the cities and counties governed by the SCAQMD.

## **6. SUBSEQUENT NEGATIVE DECLARATION NOT REQUIRED**

An addendum to a negative declaration may be prepared if minor technical changes or additions are necessary and none of the conditions calling for the preparation of a subsequent EIR or negative declaration are required.<sup>4</sup> CEQA Guidelines section 15162 sets forth these conditions. Section 15162 provides that *no subsequent environmental review shall be required* unless the lead agency determines, based on substantial evidence in the record that one of the following circumstances has occurred:

- Substantial changes are proposed in the project which will require major revisions of the previous negative declaration due to the involvement of *new significant environmental effects or a substantial increase in the severity of previously identified significant effects*;
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration due to the involvement of *new significant environmental effects or a substantial increase in the severity of previously identified significant effects*; or
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted, shows any of the following:
  - The project will have one or more significant effects not discussed in the previous negative declaration;
  - Significant effects previously examined will be substantially more severe;
  - Mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure; or
  - Mitigation measures which are considerably different from those analyzed would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure.

If project changes, changed circumstances or new information after adoption of a negative declaration meet the conditions above, the lead agency must prepare a subsequent EIR.

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<sup>4</sup> 14 CCR § 15164.



“Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, ***an addendum***, or no further documentation.”<sup>5</sup>

Here, none of the triggers in Guidelines section 15162 has occurred. The information contained in the Soil Reports relied upon by Blodgett Baylosis and Planning Commission staff in preparing the IS/MND, but not expressly cited therein, does not trigger the need for a subsequent negative declaration because such information does not involve (i) new or substantially more severe environmental impact(s), or (ii) mitigation measures which Trojan has declined to adopt.

The IS/MND previously found that the Project would not create a hazard to the public or the environment through the transport, use or disposal of hazardous materials, and similarly found that the Project would not create a hazard to the public or result in a reasonably foreseeable upset or accident conditions due to the release of hazardous materials.<sup>6</sup> The IS/MND found such impacts to be less-than-significant without mitigation. Although the Limited Phase II identified arsenic and lead as *potential* contaminants of concern, the potential presence of such contaminants do not constitute an environmental impact under CEQA. *See Parker Shattuck Neighbors v. Berkeley City Council*, 222 Cal. App. 4th 768, 786 (2013) (contrary to expert testimony that VOCs and total petroleum hydrocarbons may be present in soil at project site, there was no substantial evidence in the record to create a fair argument that the disturbance of contaminated soil may have a significant effect on the environment). This is particularly true when, as here, the project proponent agrees to implementation of mitigations measures that would reduce to a less than significant level any potential adverse environmental effects related to the potential presence of contaminants of concern on the project site, as discussed below.

Through this Addendum a set of nine (9) new mitigation measures are being added to the IS/MND and the MMRP that the Project proponent has voluntarily agreed to implement and must adhere to. These new mitigation measures do not impact the IS/MND’s previous conclusion that impacts on hazardous materials or conditions at the site were insignificant impacts under CEQA. A subsequent negative declaration may be required in certain situations in which a project proponent declines to adopt mitigation measures, but is not appropriate when new mitigation measures are adopted to a previously adopted mitigated negative declaration.

Therefore, a subsequent negative declaration is not needed to account for the technical changes and additional mitigation measures adopted in this Addendum.

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<sup>5</sup> 14 CCR § 15162(c).

<sup>6</sup> Initial Study/Mitigated Negative Declaration for the Trojan Storage 6210 Garfield Avenue Project (May 24, 2019) at 11, 55-57.

# **INITIAL STUDY & MITIGATED NEGATIVE DECLARATION**

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**CITY OF COMMERCE  
TROJAN STORAGE  
6210 GARFIELD AVENUE**



**LEAD AGENCY:**

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

**REPORT PREPARED BY:**

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

**MAY 24, 2019**

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## MITIGATED NEGATIVE DECLARATION

**PROJECT NAME:** Trojan Storage.

**PROJECT ADDRESS:** 6210 Garfield Avenue.

**APPLICANT:** Brett Henry, Trojan Storage. 1732 Aviation Boulevard, Suite 217, Redondo Beach, California 90278

**CITY AND COUNTY:** Commerce, Los Angeles County.

**DESCRIPTION:** The City of Commerce Public Works and Development Services Department, in its capacity as the Lead Agency, is reviewing a request by Trojan Storage to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet) site located at 6210 Garfield Avenue. A total of 18 standard spaces and 33 R.V. parking spaces will be striped. In addition, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. Access to the site will be provided by an existing driveway located along the project site's western property line.

**FINDINGS:** The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any potentially significant environmental impacts. For this reason, the City of Commerce determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may also be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* have the potential to degrade the quality of the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.

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Marc Blodgett – Consultant to the City of Commerce

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Date



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## SECTION 1 INTRODUCTION

### 1.1 PURPOSE OF THE INITIAL STUDY

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The City of Commerce Public Works and Development Services Department, in its capacity as the Lead Agency, is reviewing a request by Trojan Storage to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet) site located at 6210 Garfield Avenue. A total of 18 standard spaces and 33 R.V. parking spaces will be striped. In addition, approximately 15,415 square feet of landscaped open space representing 6.5% of the site will be provided. Access to the site will be provided by an existing driveway located along the project site's western property line.<sup>1</sup> The project Applicant is Brett Henry, Trojan Storage, 1732 Aviation Boulevard, Suite 217, Redondo Beach, California 90278.

The City of Commerce is the designated *Lead Agency* for the proposed project and will be responsible for the project's environmental review.<sup>2</sup> The construction of the proposed project will require the approval of a Conditional Use Permit to allow for storage uses within an industrial zone. The project will also require the approval of a plot plan. The aforementioned discretionary actions, together with the proposed development, are considered to be a project pursuant to the California Environmental Quality Act (CEQA).<sup>3</sup>

As part of the proposed project's environmental review, the City of Commerce authorized the preparation of this Initial Study.<sup>4</sup> Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of Commerce, in its capacity as the Lead Agency. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

- To provide the City information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration;
- To facilitate the project's environmental assessment early in the design and development of the project;
- To eliminate unnecessary EIRs;
- To determine the nature and extent of any impacts associated with the proposed project; and,
- To enable the modification of the project to mitigate adverse impacts of the project.

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<sup>1</sup> Jordan Architects, Inc. *Architectural Drawings and Site Plans Prepared for Trojan Self-Storage, Commerce, California*. April 2, 2019.

<sup>2</sup> California, State of. *California Public Resources Code, Division 13, Chapter 2.5. Definitions*. as Amended 2001. §21067.

<sup>3</sup> California, State of. *Title 14. California Code of Regulations, Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act*. as Amended 1998 (CEQA Guidelines). §15060 (b).

<sup>4</sup> California, State of. *California Environmental Quality Act (CEQA) Guidelines § 15050*. As Amended.

Based on the results of this Initial Study, the City determined that a Mitigated Negative Declaration (MND) is the appropriate environmental document for the project's environmental review pursuant to CEQA. This Initial Study and Mitigated Negative Declaration (IS/MND) and the *Notice of Intent to Adopt a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. The City contact person for this project is identified below:

Mr. Manuel Acosta, Planner  
Public Works and Development Services Department, Planning Division  
2535 Commerce Way  
Commerce, CA 90040

The Notice of Intent to Adopt a Mitigated Negative Declaration that is attached to this IS/MND, indicates public review period, including the deadline for comments on IS/MND.

## **1.2 INITIAL STUDY'S ORGANIZATION**

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The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction*, provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description*, provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis*, includes an analysis of potential impacts associated with the proposed project's construction and the subsequent operation.
- *Section 4 Findings*, indicates the conclusions of the environmental analysis and the Mandatory Findings of Significance. In addition, this section also includes the Mitigation Monitoring and Reporting Program (MMRP).
- *Section 5 References*, identifies the sources used in the preparation of this Initial Study.

## **1.3 INITIAL STUDY CHECKLIST**

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The environmental analysis provided in Section 3 of this Initial Study indicates that the proposed project will not result in any unmitigable, significant impacts on the environment. For this reason, the City of Commerce determined that a MND is the appropriate CEQA document for the proposed project. The findings of this Initial Study are summarized in Table 1-1 provided on the following pages.

**Table 1-1**  
**Initial Study Checklist**

<b>Description of Issue</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant Impact with Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<b>SECTION 3.1 AESTHETICS</b>				
<b>3.1.A.</b> Would the project have a substantial adverse effect on a scenic vista?				<b>X</b>
<b>3.1.B.</b> Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				<b>X</b>
<b>3.1.C.</b> Would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				<b>X</b>
<b>3.1.D.</b> Would the project create a new source of substantial light or glare which would adversely affect day- or night-time views in the area?		<b>X</b>		
<b>SECTION 3.2 AGRICULTURE &amp; FORESTRY RESOURCES</b>				
<b>3.2.A.</b> Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				<b>X</b>
<b>3.2.B.</b> Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?				<b>X</b>
<b>3.2.C.</b> Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code section §12220(g)), timberland (as defined by Public Resources Code section §4526), or timberland zoned Timberland Production (as defined by Government Code section §51104(g))?				<b>X</b>
<b>3.2.D.</b> Would the project result in the loss of forest land or the conversion of forest land to a non-forest use?				<b>X</b>
<b>3.2.E.</b> Would the project involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or the conversion of forest land to a non-forest use?				<b>X</b>
<b>SECTION 3.3 AIR QUALITY</b>				
<b>3.2.A.</b> Would the project conflict with or obstruct implementation of the applicable air quality plan?			<b>X</b>	
<b>3.2.B.</b> Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation?			<b>X</b>	
<b>3.3.C.</b> Would the project expose sensitive receptors to substantial pollutant concentrations?			<b>X</b>	
<b>3.3.D.</b> Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?				<b>X</b>

**Table 1-1**  
**Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
<b>SECTION 3.4 BIOLOGICAL RESOURCES</b>				
<b>3.4.A.</b> Would the project, either directly or through habitat modifications, have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?				<b>X</b>
<b>3.4.B.</b> Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				<b>X</b>
<b>3.4.C.</b> Would the project have a substantial adverse effect on State or Federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				<b>X</b>
<b>3.4.D.</b> Would the project interfere substantially with the movement of any native resident or migratory fish, wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				<b>X</b>
<b>3.4.E.</b> Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			<b>X</b>	
<b>3.4.F.</b> Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans?				<b>X</b>
<b>SECTION 3.5 CULTURAL RESOURCES</b>				
<b>3.5.A.</b> Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				<b>X</b>
<b>3.5.B.</b> Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?		<b>X</b>		
<b>3.5.C.</b> Would the project disturb any human remains, including those interred outside of dedicated cemeteries?			<b>X</b>	
<b>SECTION 3.6 ENERGY</b>				
<b>3.6.A.</b> Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy, resources, during project construction or operation?			<b>X</b>	
<b>3.6.B.</b> Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			<b>X</b>	

**Table 1-1**  
**Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
<b>SECTION 3.7 GEOLOGY &amp; SOILS</b>				
<b>3.7.A.</b> Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?			<b>X</b>	
<b>3.7.B.</b> Would the project result in substantial soil erosion or the loss of topsoil?			<b>X</b>	
<b>3.7.C.</b> Would the project be located on a soil or geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			<b>X</b>	
<b>3.7.D.</b> Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012) creating substantial direct or indirect risks to life or property?			<b>X</b>	
<b>3.7.E.</b> Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				<b>X</b>
<b>3.7.F.</b> Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?				<b>X</b>
<b>SECTION 3.8 GREENHOUSE GAS EMISSIONS</b>				
<b>3.8.A.</b> Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			<b>X</b>	
<b>3.8.B.</b> Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?			<b>X</b>	
<b>SECTION 3.9 HAZARDS &amp; HAZARDOUS MATERIALS</b>				
<b>3.9.A.</b> Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			<b>X</b>	
<b>3.9.B.</b> Would the project create a significant hazard to the public or the environment or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			<b>X</b>	
<b>3.9.C.</b> Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				<b>X</b>
<b>3.9.D.</b> Would the project be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code §65962.5, and as a result, would it create a significant hazard to the public or the environment?				<b>X</b>



**Table 1-1**  
**Initial Study Checklist**

<b>Description of Issue</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant Impact with Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<b>3.9.E.</b> For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				<b>X</b>
<b>3.9.F.</b> Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?				<b>X</b>
<b>3.9.G.</b> Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				<b>X</b>
<b>SECTION 3.10 HYDROLOGY &amp; WATER QUALITY</b>				
<b>3.10.A.</b> Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			<b>X</b>	
<b>3.10.B.</b> Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			<b>X</b>	
<b>3.10.C.</b> Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows?				<b>X</b>
<b>3.10.D.</b> Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				<b>X</b>
<b>3.10.E.</b> Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				<b>X</b>
<b>SECTION 3.11 LAND USE &amp; PLANNING</b>				
<b>3.11.A.</b> Would the project physically divide an established community?				<b>X</b>
<b>3.11.B.</b> Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				<b>X</b>
<b>SECTION 3.12 MINERAL RESOURCES</b>				
<b>3.12.A.</b> Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				<b>X</b>

**Table 1-1**  
**Initial Study Checklist**

<b>Description of Issue</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant Impact with Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<b>3.12.B.</b> Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				<b>X</b>
<b>SECTION 3.13 NOISE</b>				
<b>3.13.A.</b> Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		<b>X</b>		
<b>3.13.B.</b> Would the project result in generation of excessive ground-borne vibration or ground borne noise levels?			<b>X</b>	
<b>SECTION 3.14 POPULATION &amp; HOUSING</b>				
<b>3.14.A.</b> Would the project induce substantial unplanned population growth in an area, either directly or indirectly?				<b>X</b>
<b>3.14.B.</b> Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				<b>X</b>
<b>SECTION 3.15 PUBLIC SERVICES</b>				
<b>3.15.A.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>fire protection services</i> ?			<b>X</b>	
<b>3.15.B.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>police protection services</i> ?		<b>X</b>		
<b>3.15.C.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>school services</i> ?			<b>X</b>	
<b>3.15.D.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in <i>other public facilities</i> ?				<b>X</b>

**Table 1-1**  
**Initial Study Checklist**

<b>Description of Issue</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant Impact with Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<b>SECTION 3.16 RECREATION</b>				
<b>3.16.A.</b> Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				<b>X</b>
<b>3.16.B.</b> Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				<b>X</b>
<b>SECTION 3.17 TRANSPORTATION</b>				
<b>3.17.A.</b> Would the project conflict with a plan, ordinance, or policy establishing measures addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?			<b>X</b>	
<b>3.17.B.</b> For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)?			<b>X</b>	
<b>3.17.C.</b> For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(2)?				<b>X</b>
<b>3.17.D.</b> Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		<b>X</b>		
<b>3.17.E.</b> Would the project result in inadequate emergency access?				<b>X</b>
<b>SECTION 3.18 TRIBAL CULTURAL RESOURCES</b>				
<b>3.18.A.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?			<b>X</b>	
<b>3.18.B.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.?			<b>X</b>	

**Table 1-1**  
**Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
<b>SECTION 3.19 UTILITIES &amp; SERVICE SYSTEMS</b>				
<b>3.19.A.</b> Would the project require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental impacts?				<b>X</b>
<b>3.19.B.</b> Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			<b>X</b>	
<b>3.19.C.</b> Would the project result in a determination by the wastewater treatment provider, which 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?			<b>X</b>	
<b>3.19.D.</b> Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?			<b>X</b>	
<b>3.19.E.</b> Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?				<b>X</b>
<b>3.19.F.</b> Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				<b>X</b>
<b>SECTION 3.20 WILDFIRE</b>				
<b>3.20.A.</b> If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project impair an adopted emergency response plan or emergency evacuation plan?				<b>X</b>
<b>3.20.B.</b> Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			<b>X</b>	
<b>3.20.C.</b> Would the project require the installation of maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				<b>X</b>
<b>3.20.D.</b> Would the project expose people or structure to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				<b>X</b>

**Table 1-1**  
**Initial Study Checklist**

Description of Issue	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
<b>SECTION 3.21 MANDATORY FINDINGS OF SIGNIFICANCE</b>				
<b>3.21.A.</b> The approval and subsequent implementation of the proposed project <i>will not</i> have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				<b>X</b>
<b>3.21.B.</b> The approval and subsequent implementation of the proposed project <i>will not</i> have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and other effects or probable future projects)?				<b>X</b>
<b>3.21.C.</b> The approval and subsequent implementation of the proposed project <i>will not</i> have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.				<b>X</b>





## SECTION 2 PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

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The City of Commerce Public Works and Development Services Department, in its capacity as the Lead Agency, is reviewing a request by Trojan Storage to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet) site located at 6210 Garfield Avenue. In addition, a total of 18 standard spaces and 33 R.V. parking spaces will be striped. Finally, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. Access to the site will be provided by an existing driveway located along the project site's western property line on the east side of Garfield Avenue.<sup>5</sup> The project is described in greater detail in Section 2.4.

### 2.2 PROJECT LOCATION

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The project site is located in the southeastern 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.<sup>6</sup> Regional access to the City is provided by the Santa Ana Freeway (I-5) and the Long Beach Freeway (I-710).<sup>7</sup> The project site's legal address is 6210 Garfield Avenue. The site's corresponding Assessor Parcel Numbers include 6357-001-050 and 6357-001-051.<sup>8</sup>

Major streets located in the vicinity of the project site include Slauson Avenue, located 0.38 mile to the north; Gage Avenue, located 0.22 mile to the south; Paramount Boulevard, located 1.48 miles to the east; and Eastern Avenue, located one mile to the west the site. Garfield Avenue extends along the site's western boundary in a southwest to northeast orientation. The location of the City of Commerce in a regional context is shown in Exhibit 2-1. An area wide map is shown in Exhibit 2-2. Finally, a vicinity map is provided in Exhibit 2-3.

### 2.3 ENVIRONMENTAL SETTING

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The project area is located in the midst of an industrial area located in the southern portion of the City. The following land uses and development are located near the project site:

- *North of the project site.* A Southern Pacific Railroad right-of-way extends along the project site's northern property line. A Prologis warehouse is located further north of the aforementioned railroad.

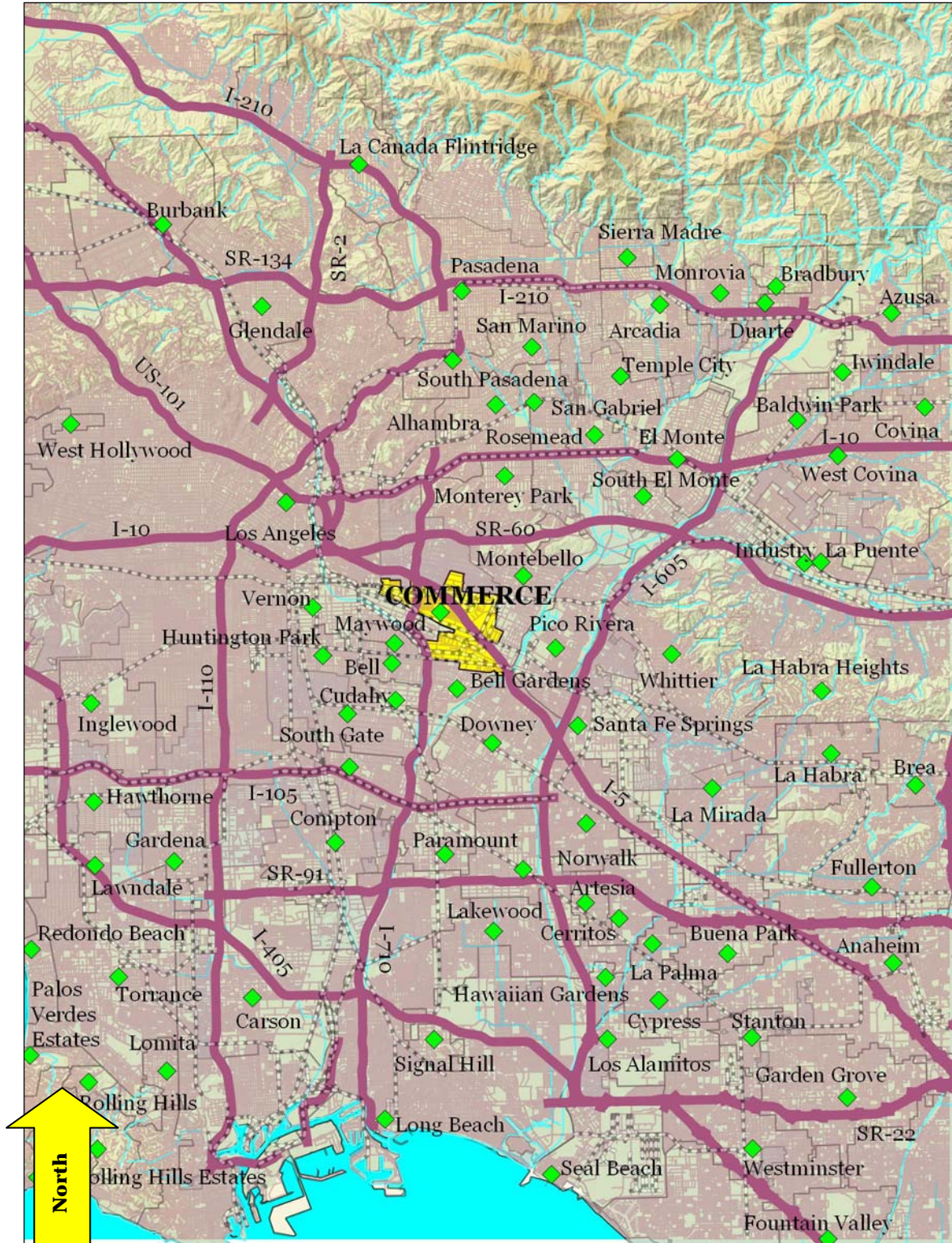
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<sup>5</sup> Jordan Architects, Inc. *Architectural Drawings and Site Plans Prepared for Trojan Self-Storage, Commerce, California*. April 2, 2019.

<sup>6</sup> United States Geological Survey. *Los Angeles 7½ Minute Quadrangle*.

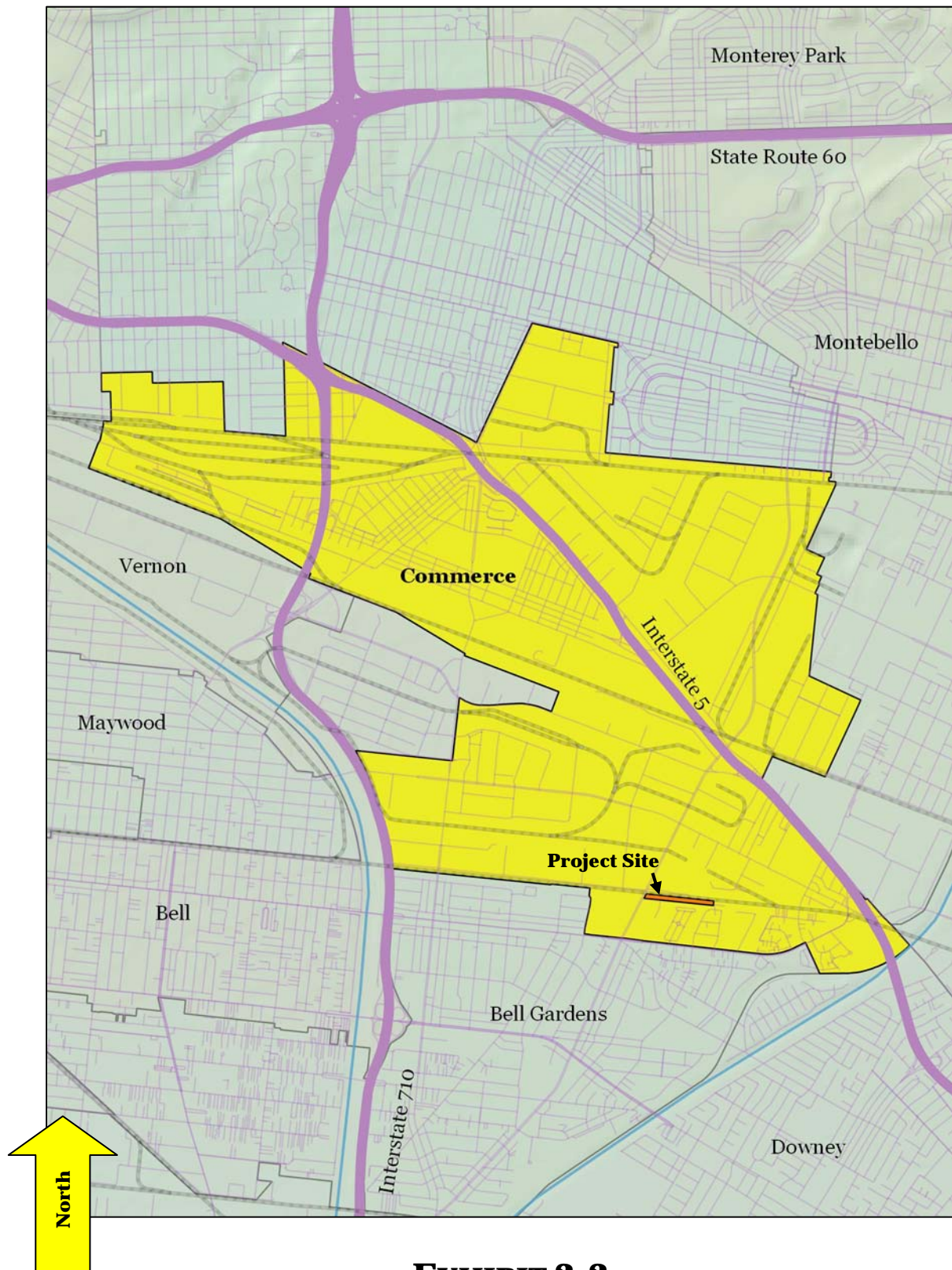
<sup>7</sup> Google Earth. Website accessed on January 10, 2019.

<sup>8</sup> City of Commerce. Plot Plan and Site Plan Form.



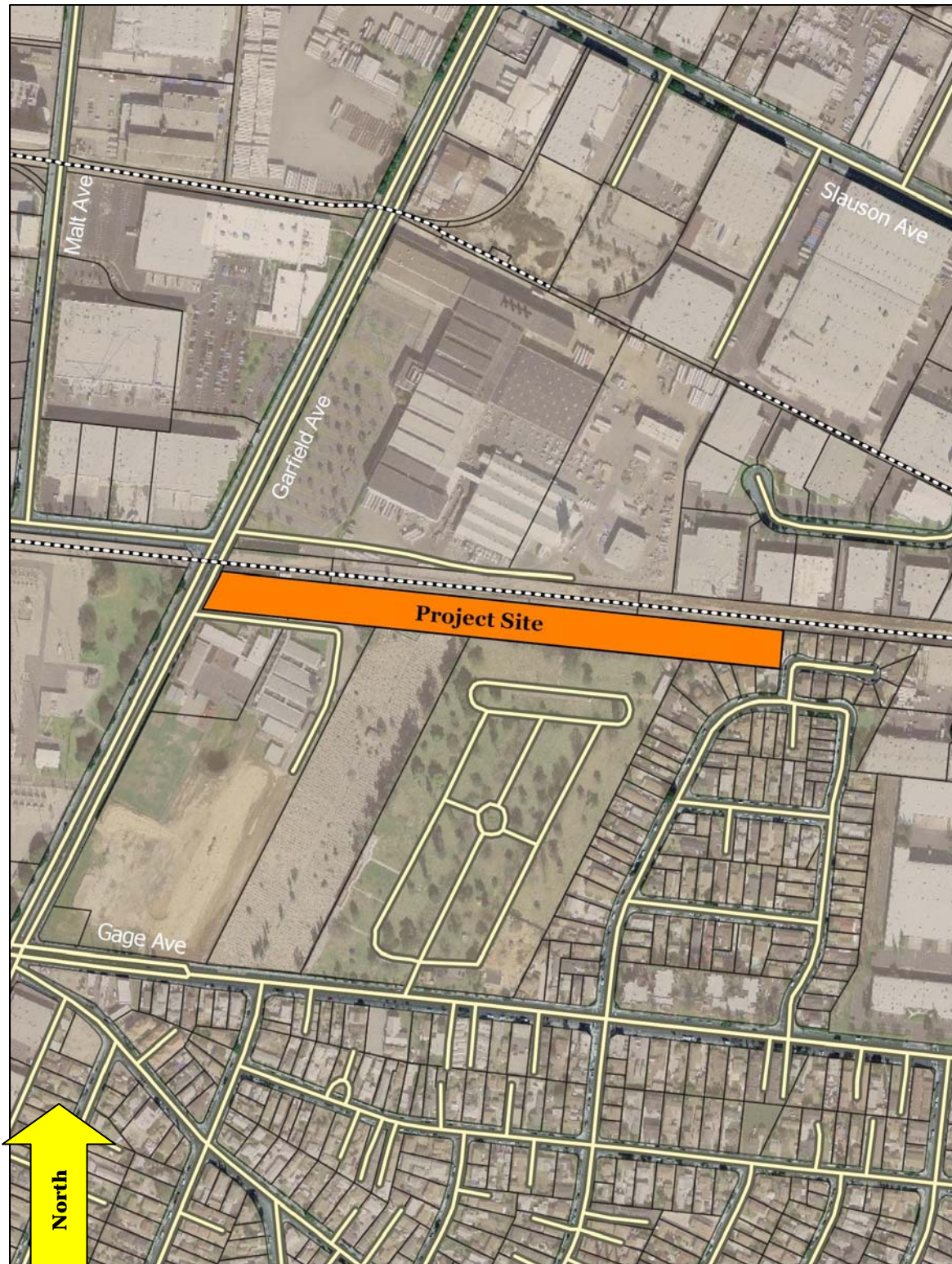
**EXHIBIT 2-1**  
**REGIONAL MAP**  
SOURCE: QUANTUM GIS





**EXHIBIT 2-2**  
**AREA WIDE MAP**  
SOURCE: QUANTUM GIS





**EXHIBIT 2-3**  
**VICINITY MAP**  
SOURCE: QUANTUM GIS

- *South of the project site.* The project site is bounded to the south by a swap meet, Mount Carmel Cemetery, and Park Lawn Cemetery.
- *East of the project site.* Single-family housing abuts the project site to the east.
- *West of the project site.* Garfield Avenue extends along the west side of the project site. A Southern California Edison substation occupies frontage along the west side of Garfield Avenue, opposite the project.<sup>9</sup>

The site is currently occupied by Eddie Kane Steel Products, Inc. The site is occupied by four main buildings and ancillary structures. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. These existing buildings have a total floor area of 237,372 square feet.<sup>10</sup> An aerial photograph is provided in Exhibit 2-4.

## **2.4 PROJECT DESCRIPTION**

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### **2.4.1 PHYSICAL CHARACTERISTICS**

The proposed project involves the construction of a self-storage facility within a 5.39-acre (234,788 square feet) site. The project elements are described below:<sup>11</sup>

- *Project Site.* The project site has a maximum lot depth (west to east) of 2,493 feet and a maximum lot width (north to south) of 133 feet. The proposed development will have a lot coverage of 48% and a floor area ratio (FAR) of 0.90 to 1.0. The project will consist of two buildings (referred to herein as Buildings A and B).
- *Building A.* The main building, Building A, will consist of two stories and will have a total floor area of 197,000 square feet. The first floor will total 96,567 square feet while the second floor will total 100,433 square feet of floor area. Building A will also include 1,155 square feet of office space on the first floor and a 1,155 square feet residence for an on-site manager on the second floor. This building will be located within the northwest portion of the project site.<sup>12</sup> A total of 1,300 individual storage units are proposed.
- *Building B.* Building B will consist of a single story structure totaling 14,330 square feet. This building will be located in the eastern half of the project site.

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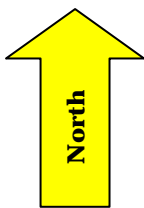
<sup>9</sup> Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on July 20, 2018.

<sup>10</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>11</sup> Jordan Architects, Inc. *Architectural Drawings and Site Plans Prepared for Trojan Self-Storage, Commerce, California*. April 2, 2019.

<sup>12</sup> Ibid.





**EXHIBIT 2-4**  
**AERIAL PHOTOGRAPH**  
SOURCE: GOOGLE EARTH

- *Parking.* A total of 18 parking spaces will be provided for the public and employee parking. The public parking stalls will be located in the western portion of the site next to the office and in the eastern portion of the site. In addition, a total of 33 parking spaces will be provided for R.V. storage in the eastern portion of the property.
- *Access.* Vehicular access to the project site will be permitted by a new driveway apron located along the east side of Garfield Avenue. The new driveway will be located in an area occupied by the existing driveway.
- *Landscaping.* The proposed project will include approximately 15,415 square feet of open space.

The proposed project is summarized in Table 2-1, which is shown below. The proposed site plan is provided in Exhibit 2-5 and the building elevations are provided in Exhibits 2-6.

**Table 2-1**  
**Project Summary Table**

<b>Project Element</b>	<b>Description</b>
Site Area	234,690 sq. ft. (5.39 acres)
Total Building Floor Area	213,640 sq. ft.
Lot Coverage	48%
FAR	0.90 to 1.0
Maximum Building Height	36 ft.
Landscaping	15,415 sq. ft (6.5% of site)
Parking	18 public spaces & 33 R.V. spaces

**Source: Jordan Architects, Inc.**

## **2.4.2 CONSTRUCTION CHARACTERISTICS**

The construction of the phase for the proposed project would take approximately eleven months to complete. The key construction phases are outlined below:

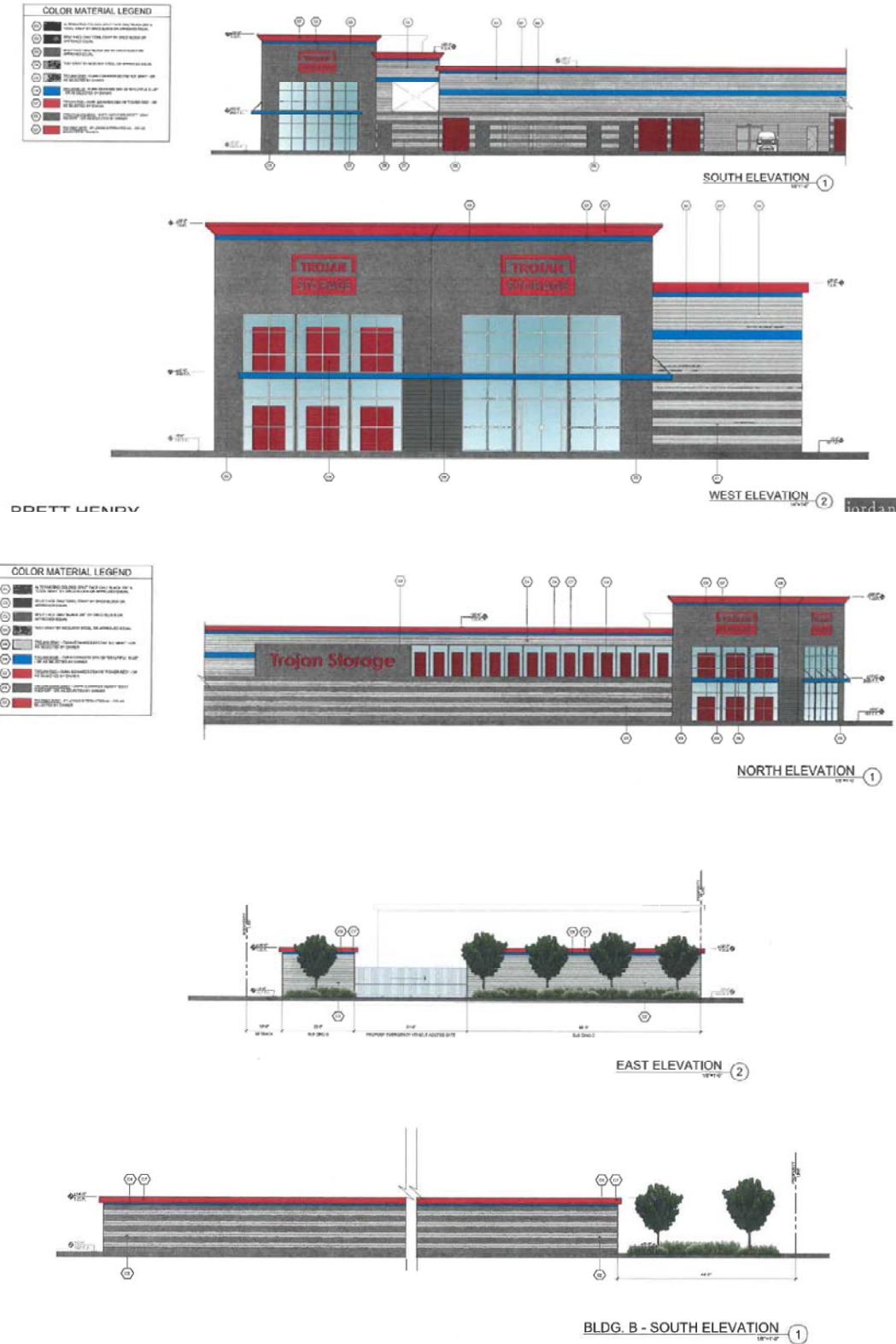
- *Building Demolition and Site Preparation.* The existing on-site improvements will be demolished during this phase. The project site will then be readied for the construction of the proposed project. Finally, the project site will also undergo finished grading during this phase. This phase will take approximately four months to complete.
- *Construction.* The new buildings will be erected during this phase. This phase will take approximately four months to complete.
- *Paving.* This phase will involve the paving of the site. This phase will take approximately one month to complete.



## SECTION 2 • PROJECT DESCRIPTION



CITY OF COMMERCE • INITIAL STUDY & MITIGATED NEGATIVE DECLARATION  
TROJAN STORAGE • 6210 GARFIELD AVENUE



**EXHIBIT 2-6**  
**PROPOSED BUILDING ELEVATIONS**  
Source: Jordan Architects, Inc.

- *Landscaping and Finishing.* This phase will involve the installation of the landscaping and the completion of the on-site improvements. This phase will take approximately two months to complete.

### **2.4.3 OPERATIONAL CHARACTERISTICS**

The leasing office will be open from 9:00 AM to 6:00 PM Monday through Saturday and 10:00 AM to 5:00 PM on Sunday, with an on-site manager, who will be an employee of the Trojan Storage. The proposed business will employ approximately 13 employees though no more than two employees will be on-site at any given time.<sup>13</sup> Each storage unit will be individually alarmed and the entire facility will be monitored by 24-hour surveillance cameras. A full-time caretaker will reside on-site at all times. In addition, computer coded gate access will control who can enter the facility.

### **2.5 DISCRETIONARY ACTIONS**

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A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Commerce) that calls for an exercise of judgment in deciding whether to approve a project. The proposed project will require the approval of the following discretionary actions:

- The approval of a Conditional Use Permit to allow the operation of a self-storage business, including outdoor storage;
- The approval of a Plot Plan; and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

Other permits will be required as part of the proposed project's approval. These other permits will include, but may not be limited to, a Grading Permit, a Building Permit, and an Occupancy Permit.



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<sup>13</sup> Based on a ratio of 0.06 employees per 1,000 square feet derived from the SANDAG.

## SECTION 3 ENVIRONMENTAL ANALYSIS

This section of the Initial Study prepared for the proposed project analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

- Aesthetics (Section 3.1);
- Agriculture and Forestry Resources (Section 3.2);
- Air Quality (Section 3.3);
- Biological Resources (Section 3.4);
- Cultural Resources (Section 3.5);
- Energy (Section 3.6);
- Geology and Soils (Section 3.7);
- Greenhouse Gas Emissions (Section 3.8);
- Hazards and Hazardous Materials (Section 3.9);
- Hydrology and Water Quality (Section 3.10);
- Land Use and Planning (Section 3.11);
- Mineral Resources (Section 3.12);
- Noise (Section 3.13);
- Population and Housing (Section 3.14);
- Public Services (Section 3.15);
- Recreation (Section 3.16);
- Transportation (Section 3.17);
- Tribal Cultural Resources (Section 3.18);
- Utilities and Service Systems (Section 3.19);
- Wildfire (Section 3.20); and,
- Mandatory Findings of Significance (Section 3.21).

Under each issue area, a description of the thresholds of significance is provided. These thresholds will assist in making a determination as to whether there is a potential for significant impacts on the environment. The analysis considers both the short-term (construction-related) and long-term (operational) impacts associated with the proposed project's implementation, and where appropriate, the cumulative impacts. To each question, there are four possible responses:

- *No Impact.* The proposed project will not result in any adverse environmental impacts.
- *Less than Significant Impact.* The proposed project may have the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Commerce or other responsible agencies consider to be significant.
- *Less than Significant Impact with Mitigation.* The proposed project may have the potential to generate a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of the recommended mitigation measures.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant. This finding will require the preparation of an environmental impact report (EIR).

## 3.1 AESTHETICS

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### 3.1.1 THRESHOLDS OF SIGNIFICANCE

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

- A substantial adverse effect on a scenic vista;
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- Substantial degrading of the existing visual character or quality of public views of the site and its surroundings; If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or,
- A new source of substantial light and glare that would adversely affect day-time or night-time views in the area.

### 3.1.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect on a scenic vista?* • *No Impact.*

The proposed project is a request from Trojan Storage to construct two separate buildings with a total floor area of 213,640 square feet within the 5.39-acre site. The primary building will consist of 197,000 square feet within two floors. This main building will occupy approximately two-thirds of the site and will contain 1,300 storage units. Two smaller buildings, with a combined floor area of 13,400 square feet, will be located in the central and easternmost portion of the project site. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is currently occupied by four buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>14</sup>

The project site is located in the midst of an urban environment with no notable topographical features in the vicinity and the overall topography of the area is generally level. The San Gabriel Mountains are located approximately 15 miles to the north and are visible from the property on clear days. Other topographical feature in the area include the Montebello Hills located four miles to the north; the Puente Hills located 5.5 miles to the northeast; the Los Angeles River located 1.5 miles to the west; and the Rio Hondo River located one mile to the east. The north-facing views from the project site are currently obstructed by the existing buildings. The new main two-level building will be comparable in height with the existing buildings. The new buildings located in the eastern portion of the site will consist of a single level and will not obstruct any views from the homes located on the north side of Watcher Street. As a result, no impacts will occur.

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<sup>14</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019.

*B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? • No Impact.*

According to the California Department of Transportation (Caltrans), Garfield Avenue is not a designated scenic highway.<sup>15</sup> In addition, there are no trees or plants located on-site and the project site does not contain any scenic rock outcroppings.<sup>16</sup> Lastly, the project site does not contain any buildings listed in the State or National registrar (refer to Section 3.5). In addition, the proposed use must comply with the City's Graffiti Control Ordinance. As a result, no impacts will occur.

*C. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • No Impact.*

The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by buildings is unpaved. The entire site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>17</sup> Once complete, the project will represent a substantial visual improvement over the existing conditions. The new development will feature modern architecture, façade treatments, and a neutral color scheme. As a result, no impacts will occur.

*D. Would the project create a new source of substantial light or glare that would adversely affect day- or night-time views in the area? • Less than Significant Impact with Mitigation.*

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as *light trespass* which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. Future sources of light emanating from the project site include vehicular headlights, interior lighting, and exterior lighting including street security and parking area lighting. The proposed project will be required to adhere to Section 19.19.130 of the City's municipal code, which states the following: "All lights shall be directed, oriented, and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that would obstruct drivers' vision. Landscape lighting shall be low-level, unobtrusive fixtures."<sup>18</sup> The nearest sensitive receptors include the homes that abut the south and east sides of the project site. These homes are located on the north side of Watcher Street and on the west side of Danielson Court. The following mitigation measures will be required to ensure that light trespass and spillover will not adversely affect the housing units:

- 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.

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<sup>15</sup> California Department of Transportation. *Official Designated Scenic Highways*. [www.dot.ca.gov](http://www.dot.ca.gov)

<sup>16</sup> Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on July 20, 2018.

<sup>17</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>18</sup> City of Commerce Municipal Code. *Section 19.19.130(F)*.

- The signs must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver.
- The security and parking area lighting must be designed so as to prevent spillover lighting and/or glare on the adjacent residential properties.

With adherence the above mitigation measures, the project's potential impacts would be less than significant.

### **3.1.3 MITIGATION MEASURES**

The following mitigation measures will be required to ensure that light trespass and spillover will not adversely affect the housing units:

*Mitigation Measure No. 1 (Light and 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 No. 2 (Light and Glare Impacts).* The signs must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver.

*Mitigation Measure No. 3 (Light and Glare Impacts).* The security and parking area lighting must be designed so as to prevent spillover lighting and/or glare on the adjacent residential properties.

## **3.2 AGRICULTURE & FORESTRY RESOURCES**

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### **3.2.1 THRESHOLDS OF SIGNIFICANCE**

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

- The conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance;
- A conflict with existing zoning for agricultural use or a Williamson Act Contract;
- A conflict with existing zoning for, or cause rezoning of, forest land (as defined in *Public Resources Code section §12220(g)*), timberland (as defined by *Public Resources Code section §4526*), or timberland zoned Timberland Production (*Government Code section §51104(g)*);
- The loss of forest land or the conversion of forest land to a non-forest use; or,
- Changes to the existing environment that due to their location or nature may result in the conversion of farmland to non-agricultural use or the conversion of forestland to a non-forest use.

### 3.2.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? • No Impact.*

The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>19</sup> According to the California Department of Conservation, the project site does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.<sup>20</sup> The project site is located within a largely developed area of the City and there are no areas in close proximity to the project site that are classified as “Prime Farmland.” Since the implementation of the proposed project will not involve the conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses, no impacts will occur.

- B. *Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract? • No Impact.*

The project site is currently zoned as M2 (*Heavy Industrial*).<sup>21</sup> The project’s implementation will not require a zone change though a conditional use permit (CUP) will be required for the proposed storage use. Therefore, no loss in land zoned for agriculture will occur. The site is currently occupied by Eddie Kane Steel Products, Inc, and there are no ongoing agricultural activities located within either property. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.<sup>22</sup> Thus, no impacts on existing Williamson Act Contracts or land zoned for agricultural use will occur.

- C. *Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code section §12220(g)), timberland (as defined by Public Resources Code section §4526), or timberland zoned Timberland Production (as defined by Government Code section §51104(g))? • No impact.*

The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by a building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>23</sup> The project site is located in the midst of a larger urban area and no forest lands are located within the site. There are

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<sup>19</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>20</sup> California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. *Important Farmland in California 2014*. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/ora14.pdf>.

<sup>21</sup> City of Commerce Zoning Map. Website accessed on January 14, 2019.

<sup>22</sup> California Department of Conservation. *State of California Williamson Act Contract Land*. [ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA\\_2012\\_8x11.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf). Website accessed on July 23, 2018

<sup>23</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019.

no timberland resources present on-site. As a result, no impacts on forest land or timber resources will result from the proposed project's implementation.

*D. Would the project result in the loss of forest land or the conversion of forest land to a non-forest use? • No impact.*

No forest lands are located within the vicinity of the project site. As a result, no loss or conversion of forest lands will result from the proposed project's implementation and no impacts will occur and no mitigation is required.

*E. Would the project involve other changes in the existing environment that, due to their location or nature, may result in conversion of Farmland to non-agricultural use or the conversion of forest land to a non-forest use? • No Impact.*

The project would not result in a loss of farmland to non-agricultural use or conversion of forest land to non-forest use because the project site is not located in close proximity to farm land or forest land. As a result, no impacts will result from the implementation of the proposed project.

### **3.2.3 MITIGATION MEASURES**

The analysis determined that there are no agricultural or forestry resources in the project area and that the implementation of the proposed project would not result in any impacts on these resources. As a result, no impacts on agriculture or forestry resources will occur and no mitigation is required.

## **3.3 AIR QUALITY**

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### **3.3.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of Commerce, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on air quality, if it would:

- A conflict with the obstruction of the implementation of the applicable air quality plan;
- A violation of an air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation;
- The exposure of sensitive receptors to substantial pollutant concentrations; or,
- The result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people.

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:



- *Ozone ( $O_3$ )* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon monoxide ( $CO$ )* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.
- *Nitrogen oxides ( $NO_x$ )* are a yellowish-brown gas, which at high levels can cause breathing difficulties.  $NO_x$  is formed when nitric oxide (a pollutant from internal combustion processes) combines with oxygen.
- *Sulfur dioxide ( $SO_2$ )* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- *$PM_{10}$  and  $PM_{2.5}$*  refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.

Projects in the South Coast Air Basin (SCAB) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen oxides;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of  $PM_{10}$ ;
- 55 pounds per day of  $PM_{2.5}$ ; or,
- 150 pounds per day of sulfur oxides.

A project would have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen oxides;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of  $PM_{10}$ ;
- 55 pounds per day of  $PM_{2.5}$ ; or,
- 150 pounds per day of sulfur oxides.

### 3.3.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project conflict with or obstruct the implementation of the applicable air quality plan?*  
• *Less than Significant Impact.*

The City of Commerce is located within the South Coast Air Basin (SCAB), which includes a 6,600 square-mile area within Los Angeles County and the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Air quality in the SCAB is monitored by the South Coast Air Quality Management District (SCAQMD) at various monitoring stations located throughout the area.<sup>24</sup>

The SCAQMD's Air Quality Handbook refers to the following criteria as a means to determine a project's conformity with the AQMP:<sup>25</sup> *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.<sup>26</sup> In addition, the project's operational emissions are well within the emissions projections identified in the 2016 AQMP. In terms of Criteria 1, the proposed project's long-term (operational) airborne emissions will be below levels that the SCAQMD considers to be a significant impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-2). The construction emissions would be below the thresholds of significance established by the SCAQMD (the project's construction emissions are summarized in Table 3-1).

The proposed project would also conform to Consistency Criteria 2 since it would not exceed the housing, population, and employment assumptions presented in the 2016 AQMP. According to the AQMP, the SCAG region is projected to see a 12% growth in population, 16% growth in housing units, 23% growth in employment, and eight percent growth in vehicle miles traveled between 2012 and 2031. The SCAG region is expected to add two million new residents through the year 2031. Furthermore, the proposed project will not conflict with the regional population forecast presented in the 2016-2040 RTP/SCS prepared by SCAG. According to the RTP/SCS Demographics and Growth Forecast Appendix, the City of Commerce is expected to add approximately 4,500 new jobs through the year 2040.<sup>27</sup> The proposed project could add approximately 13 new jobs which are well within the projected employment growth projections. This increased employment has been accounted for by SCAG growth projections and the AQMP.<sup>28</sup> Since the proposed project would not be in violation of either Consistency Criteria, the project's potential impacts are considered to be less than significant.

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<sup>24</sup> South Coast Air Quality Management District, *Final 2016 Air Quality Plan*, Adopted March 10, 2017.

<sup>25</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

<sup>26</sup> Ibid.

<sup>27</sup> Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast*. April 2016.

<sup>28</sup> South Coast Air Quality Management District, *Final 2016 Air Quality Plan*, Adopted March 10, 2017.

*B. Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation? • Less than Significant Impact.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). In addition, a total of 18 standard spaces and 33 R.V. parking spaces will be striped. Finally, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by a building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>29</sup>

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

The entire construction period for the proposed project is expected to last for approximately eleven months to complete (refer to Section 2.4.2) and would include building demolition, grading, site preparation, construction of the warehouse, and the finishing of the project (pavement areas, painting, and planting of landscaping). The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). The assumptions regarding the construction phases and the length of construction followed those also identified herein in Section 2.4.3. As shown in Table 3-1, daily construction emissions are not anticipated to exceed the SCAQMD's thresholds.

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<sup>29</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019.

**Table 3-1**  
**Estimated Daily Construction Emissions**

<b>Construction Phase</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Demolition (on-site)	3.51	35.78	22.06	0.03	11.95	3.20
Demolition (off-site)	0.45	13.72	3.29	0.03	1.04	0.31
<b>Total Demolition</b>	<b>3.96</b>	<b>49.50</b>	<b>25.35</b>	<b>0.06</b>	<b>12.99</b>	<b>3.51</b>
Site Preparation (on-site)	4.33	45.57	22.06	0.03	20.45	12.12
Site Preparation (off-site)	0.08	0.06	0.80	--	0.20	0.05
<b>Total Site Preparation</b>	<b>4.41</b>	<b>45.63</b>	<b>22.86</b>	<b>0.03</b>	<b>20.65</b>	<b>12.17</b>
Grading (on-site)	2.58	28.34	16.29	0.02	7.60	4.61
Grading (off-site)	0.07	0.05	0.67	--	0.16	0.04
<b>Total Grading</b>	<b>2.65</b>	<b>28.39</b>	<b>16.96</b>	<b>0.02</b>	<b>7.76</b>	<b>4.65</b>
Building Construction (on-site) 2019	2.36	21.07	17.16	0.02	1.28	1.21
Building Construction (off-site) 2019	0.57	4.30	4.96	0.01	1.25	0.36
<b>Total Building Construction 2019</b>	<b>2.93</b>	<b>25.37</b>	<b>22.12</b>	<b>0.03</b>	<b>2.53</b>	<b>1.57</b>
Building Construction (on-site) 2020	2.11	19.18	16.84	0.02	1.11	1.05
Building Construction (off-site) 2020	0.51	3.94	4.51	0.01	1.24	0.35
<b>Total Building Construction 2020</b>	<b>2.62</b>	<b>23.12</b>	<b>21.35</b>	<b>0.03</b>	<b>2.35</b>	<b>1.40</b>
Paving	1.18	11.80	12.28	0.01	0.65	0.60
Paving	0.09	0.06	0.81	--	0.22	0.06
<b>Total Paving</b>	<b>1.27</b>	<b>11.86</b>	<b>13.09</b>	<b>0.01</b>	<b>0.87</b>	<b>0.66</b>
Architectural Coatings (on-site)	46.09	1.68	1.83	--	0.11	0.11
Architectural Coatings (off-site)	0.08	0.05	0.73	--	0.20	0.05
<b>Total Architectural Coatings</b>	<b>46.17</b>	<b>1.73</b>	<b>2.56</b>	<b>--</b>	<b>0.31</b>	<b>0.16</b>
<b>Maximum Daily Emissions</b>	<b>46.17</b>	<b>49.50</b>	<b>25.35</b>	<b>0.07</b>	<b>20.65</b>	<b>12.18</b>
<b>Daily Thresholds</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod V.2016.3.2. (the worksheet are included herein in Appendix A)

The long-term air quality impacts associated with the proposed project include mobile emissions from vehicular traffic; area emissions from cleaning products and the operation of landscaping equipment; and off-site stationary emissions associated with the off-site energy generation and consumption (natural gas). The analysis of long-term operational impacts summarized in Table 3-2, also used the CalEEMod computer model developed for the SCAQMD. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD's daily emissions thresholds.

**Table 3-2**  
**Estimated Operational Emissions in lbs/day**

<b>Emission Source</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Area-wide (lbs/day)	4.75	--	0.02	--	--	--
Energy (lbs/day)	--	0.04	0.04	--	--	--
Mobile (lbs/day)	0.74	3.86	10.94	0.04	3.28	0.90
<b>Total (lbs/day)</b>	<b>5.49</b>	<b>3.91</b>	<b>11.00</b>	<b>0.04</b>	<b>3.29</b>	<b>0.90</b>
<b>Daily Thresholds</b>	<b>55</b>	<b>55</b>	<b>55o</b>	<b>15o</b>	<b>15o</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod V.2016.3.2. (the worksheet is included herein in Appendix A)

Since the cumulative air quality emissions are under the thresholds of significance established by the SCAQMD, the potential air quality impacts are considered to be less than significant.

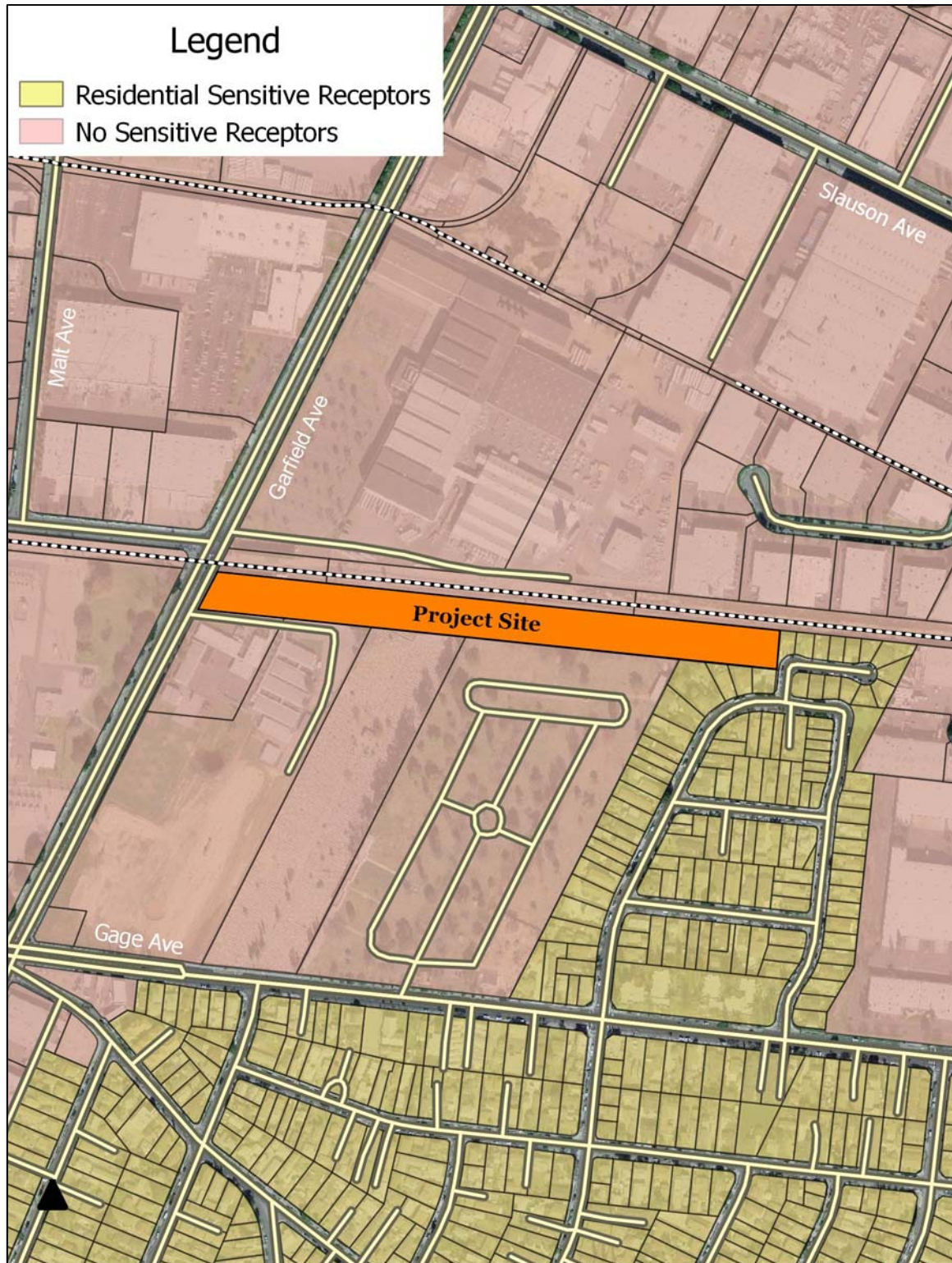
*C. Would the project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact.*

The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as *hot-spots*. Three variables influence the creation of a CO hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area. As indicated in Section 3.17.2.A, the project generated less than 50 peak hour trips at the study intersections and project trips did not result in a significant impact at the study intersections. No study intersections were reduced from the pre-project from Level of Service D or better to the “with Project” of Level of Service E or worse for Existing plus Project traffic conditions.<sup>30</sup> Since the project will not result in a degradation of any other study intersection’s level of service, the likelihood of a CO hot-spot developing at this intersection is considered remote. Therefore, the project’s impacts would be less than significant with respect to CO hot-spots.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate.<sup>31</sup> No residential uses are located within the project site nor are any proposed under the City’s General Plan. The nearest sensitive receptors include the homes that abut the south and east sides of the project site. These homes are located on the north side of Watcher Street and on the west side of Danielson Court. Exhibit 3-1 indicates the location and extent of sensitive receptors to the project site and their distance.

<sup>30</sup> Crown City Engineering, Inc.

<sup>31</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.



**EXHIBIT 3-1**  
**SENSITIVE RECEPTORS MAP**  
SOURCE: QUANTUM GIS

The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project will result in an exceedance of *localized emissions thresholds* or LSTs. LSTs only apply to short-term (construction) emissions at a fixed location and do not include off-site or area-wide emissions. The pollutants that are the focus of the LST analysis include the conversion of NO<sub>x</sub> to NO<sub>2</sub>; carbon monoxide (CO) emissions from construction; PM<sub>10</sub> emissions from construction; and PM<sub>2.5</sub> emissions from construction. For purposes of the LST analysis, the receptor distance used was 25 meters.

**Table 3-3  
Local Significance Thresholds Exceedance SRA 5 for 5-Acre Sites**

Emissions	Project Emissions (lbs/day)	Type	Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)				
			25	50	100	200	500
NO <sub>2</sub>	<b>49.50</b>	Construction	<b>172</b>	165	176	194	244
CO	<b>25.35</b>	Construction	<b>1,480</b>	1,855	2,437	3,867	9,312
PM <sub>10</sub>	<b>9.63</b>	Construction	<b>14</b>	42	60	95	203
PM <sub>2.5</sub>	<b>6.12</b>	Construction	<b>7</b>	10	15	30	103

Based on the analysis of LST impacts summarized above in Table 3-3, the potential impacts will be less than significant.

*D. Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people? • No Impact.*

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.<sup>32</sup> The proposed project involves the construction and subsequent occupancy of two separate buildings with a total floor area of 213,640 square feet. The primary building will consist of 197,000 square feet within two floors and will contain 1,300 storage units. As designed, the proposed project will not be involved in any of the aforementioned odor-generating activities. Given the nature of the proposed public storage use, no operational impacts related to odors are anticipated with the proposed project.

### 3.3.3 MITIGATION MEASURES

The analysis of air quality impacts indicated that no impacts on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required. The emissions will be reduced through the implementation of the standard SCAQMD regulations, including the following:

- *SCAQMD Rule 402* prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

<sup>32</sup> South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix 9*. As amended 2017.



- *SCAQMD Rule 403* governs fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source.
- *SCAQMD Rule 481* applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the specific conditions are met.
- *SCAQMD Rule 1108* governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule would regulate the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the project must comply with SCAQMD Rule 1108.
- *SCAQMD Rule 1113* governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. As of January 1, 2014, VOC content in architectural coatings will be limited to no more than 50 grams per liter. Therefore, all paints and solvents used during construction of the project must comply with SCAQMD Rule 1113.
- *SCAQMD Rule 1143* governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction.
- *SCAQMD Rule 1186* limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.
- *SCAQMD Rule 1303* governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM<sub>10</sub> among other pollutants.
- *SCAQMD Rule 1401*, New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants (TACs).

All pertinent SCAQMD Rules are standard conditions required for every construction project undertaken in the City as well as in the cities and counties governed by the SCAQMD.



### **3.4 BIOLOGICAL RESOURCES**

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#### **3.4.1 THRESHOLDS OF SIGNIFICANCE**

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

- A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service;
- A substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- A substantial adverse effect on State or federally protected wetlands as defined (including, but not limited to, marsh, vernal, pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- A substantial interference with the movement of any native resident or migratory fish, or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites;
- A conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans.

#### **3.4.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

- A. *Would the project either directly or through habitat modifications, have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?* • *No Impact.*

The proposed project is a request from Trojan Storage to construct two separate buildings with a total floor area of 213,640 square feet within the 5.39-acre site. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet. With the exception of limited trees and shrubs located along the project site's north side, the property contains limited vegetation. All of this existing vegetation consists of common introduced and/or invasive species.

A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDB) Bios Viewer for the Los Angeles Quadrangle (the City of Commerce is located within the aforementioned quadrangle) indicated that 33 special-status species have the potential to occur in the Los Angeles Quadrangle, five of which are either threatened or endangered.<sup>33</sup> These species are described in detail below and include:

- The *Coastal California Gnatcatcher* is not likely to be found on-site due to the lack of habitat suitable for the California gnatcatcher. The absence of coastal sage scrub, the California gnatcatcher's primary habitat, further diminishes the likelihood of encountering such birds.<sup>34</sup>
- The *least Bell's vireo* lives in a riparian habitat, with a majority of the species living in San Diego County.<sup>35</sup> As a result, it is not likely that any least Bell's vireos would be encountered during on-site construction activities.
- The *willow flycatcher's* habitat consists of marsh, brushy fields, and willow thickets. These birds are often found near streams and rivers and are not likely to be found on-site due to the lack of marsh and natural hydrologic features.<sup>36</sup>
- The *California red-legged frog* would not be found on or near the project site due to its specific habitat requirements. According to the National Wildlife Federation, California red-legged frogs can be found near still or slow moving ponds, pools, or streams (wetland areas).<sup>37</sup> The chances of encountering this species within the project site are limited since there are no natural wetlands or habitats present in the area.
- The *bank swallow* populations located in Southern California are extinct. Additionally, the current level of development around the project site would not be an ideal environment for the Bank Swallow.<sup>38</sup>

A search was conducted using the California Native Plant Society's Inventory of Rare and Endangered Plants to ascertain any rare or endangered plant species which may occur in the Los Angeles Quadrangle. The following five plants have been identified in the Los Angeles Quadrangle: Davidson's Saltscale, Los Angeles Sunflower, Mesa Horkelia, Prostrate Vernal Pool Navarretia, and the Greata's Aster.<sup>39</sup> None of these plants were encountered during the site visit. As a result, no impacts on any candidate, sensitive, or special status species would result from the proposed project's implementation.

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<sup>33</sup> California Department of Fish and Wildlife. *Bios Viewer*. <https://map.dfg.ca.gov/bios/?tool=cnddbQuick>

<sup>34</sup> Audubon. *California Gnatcatcher (Poliophtila californica)*. <https://www.audubon.org/field-guide/bird/california-gnatcatcher>.

<sup>35</sup> California Partners in Flight Riparian Bird Conservation Plan. *Least Bell's Vireo*. [http://www.prbo.org/calpif/htmldocs/species/riparian/least\\_bell\\_vireo.htm](http://www.prbo.org/calpif/htmldocs/species/riparian/least_bell_vireo.htm)

<sup>36</sup> Audubon. *Willow flycatcher (Empidonax traillii)*. <http://birds.audubon.org/birds/willow-flycatcher>.

<sup>37</sup> National Wildlife Foundation. *California Red-Legged Frog*. Website <http://www.nwf.org/wildlife/wildlife-library/amphibians-reptiles-and-fish/california-red-legged-frog.aspx> Website accessed on March 22, 2018.

<sup>38</sup> Audubon. *Bank Swallow (Riparia riparia)*. <https://www.audubon.org/guia-de-aves/ave/bank-swallow>. [http://www.prbo.org/calpif/htmldocs/species/riparian/bank\\_swallow\\_acct2.html](http://www.prbo.org/calpif/htmldocs/species/riparian/bank_swallow_acct2.html).

<sup>39</sup> California Native Plant Society, Rare Plant Program. 2018. *Inventory of Rare and Endangered Plants of California*. <http://www.rareplants.cnps.org>.

- B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • No Impact.*

The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>40</sup> The field survey indicated that there are no wetlands or riparian habitat present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper.<sup>41</sup> In addition, there are no designated “blue line streams” located within the project area. As a result, no impacts on natural or riparian habitat will result from the proposed project’s implementation.

- C. Would the project have a substantial adverse effect on State or federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.*

As indicated in the previous subsection, the project site and the adjacent developed properties do not contain any natural wetland and/or riparian habitat.<sup>42</sup> As a result, the proposed project will not impact any protected wetland area or designated blue-line stream and no impacts will occur.

- D. Would the project interfere substantially with the movement of any native resident or migratory fish, wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? • No Impact.*

The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>43</sup> The site is surrounded by development and lacks suitable riparian habitat.<sup>44</sup> Furthermore, the site contains no natural hydrological features. As a result, no impacts to migratory species will occur.

- E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact.*

Chapter 12.06 – City Trees serves as the City’s tree preservation ordinance. Trees located within the public right-of-way are considered to be the property of the City. There are no trees located within the segment of the Garfield Avenue located in front of the project site. With the exception of limited trees and shrubs located along the project site’s north side, the property itself contains limited vegetation. All

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<sup>40</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>41</sup> United States Fish and Wildlife Service. *National Wetlands Inventory*. <https://www.fws.gov/Wetlands/data/Mapper.html>.

<sup>42</sup> Ibid.

<sup>43</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>44</sup> Blodgett Baylosis Environmental Planning. *Site Survey*. The site visit was conducted on July 20, 2018.

of this existing vegetation consists of common introduced and/or invasive species. The proposed project will include approximately 15,415 square feet of open space. As a result, the potential impacts are considered to be less than significant.

*F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans? • No Impact.*

The project site is located within an urbanized setting and no natural habitats are found within the proposed project sites or in adjacent areas. The project site is not located within an area governed by a habitat conservation or community conservation plan. As a result, no impacts on local, regional, or State habitat conservation plans will result from the proposed project's implementation.

### **3.4.3 MITIGATION MEASURES**

The analysis determined that the proposed project will not involve any incremental loss or degradation of protected habitat. As a result, no impacts will occur and no mitigation is required.

## **3.5 CULTURAL RESOURCES**

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### **3.5.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of Commerce, acting as Lead Agency, a project may have a significant adverse impact on cultural resources if it would:

- A substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the State CEQA Guidelines;
- A substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines;
- The disturbance of any human remains, including those interred outside of dedicated cemeteries.

### **3.5.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the State CEQA Guidelines? • No Impact.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). In addition, a total of 18 standard spaces and 33 R.V. parking spaces will be striped. Finally, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is

occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>45</sup> Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. The State, through the State Historic Preservation Office (SHPO), maintains an inventory of those sites and structures that are considered to be historically significant. Finally, the U.S. Department of Interior has established specific Federal guidelines and criteria that indicate the manner in which a site, structure, or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places.<sup>46</sup>

The State regulations that govern historic resources and structures include Public Resources Code Section 5024.1 and CEQA Guidelines Sections 15064.5(a) and 15064.5(b). There are three historic sites in Commerce including the former Uniroyal Tire Plant facade (now a part of the Citadel shopping center/office complex), the Pillsbury Mill, and the Union Pacific Train Depot. None of these sites will be impacted by the proposed project. The site is currently occupied by Eddie Kane Steel Products, Inc. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>47</sup> None of these existing structures meet the aforementioned criteria. As a result, no impacts to historic structures will result.

*B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines? • Less than Significant Impact with Mitigation.*

The Gabrieleño-Kizh tribe has lived in this region for around 7,000 years.<sup>48</sup> Before European contact, approximately 5,000 Gabrieleño-Kizh people lived in villages throughout the Los Angeles Basin.<sup>49</sup> Archaeological sites are often located along creek areas, ridgelines, and vistas.<sup>50</sup> Formal Native American consultation was provided in accordance with AB-52. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. According to the AB-52 consultation, the project site is situated in an area of high archaeological significance. As a result, the following mitigation is required:

- The project Applicant will be required to obtain the services of a qualified Native American Monitor(s) 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

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<sup>45</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>46</sup> U.S. Department of the Interior, National Park Service. *National Register of Historic Places*. <http://nrhp.focus.nps.gov>. 2010.

<sup>47</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>48</sup> City of Commerce Community Development Department. *Citywide Historic Preservation Plan*. Plan dated May 2010.

<sup>49</sup> Rancho Santa Ana Botanical Garden. *Tongva Village Site*. <http://www.rsabg.org/tongva-village-site-1>.

<sup>50</sup> McCawley. *The First Angelinos, the Gabrieleño Indians of Los Angeles County*. 1996.

auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) must be approved by the tribal representatives and will be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor(s) will complete monitoring logs on a daily basis. The monitor(s) will photo-document the ground disturbing activities. The monitor(s) must also have Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) will be required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k). 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.

Adherence to the abovementioned mitigation will reduce potential impacts to levels that are less than significant.

*C. Would the project disturb any human remains, including those interred outside of formal cemeteries? • Less than Significant Impact.*

The southern portion of the City includes four ethnic cemeteries: the Mount Olive Cemetery, the Russian Molokian Cemetery, the Mount Carmel Cemetery, and the Park Lawn Cemetery. The Mount Carmel Cemetery and the Park Lawn Cemetery abuts the proposed project on the south side. Notwithstanding, in the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Los Angeles County Sheriff's Department would be contacted (the Department would then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b). In addition, Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. Therefore, the potential impacts are considered to be less than significant.

### **3.5.3 MITIGATION MEASURES**

According to the AB-52 consultation, the project site is situated in an area of high archaeological significance. As a result, the following mitigation is required:

*Mitigation Measure No. 4 (Cultural Resources Impacts).* The project Applicant will be required to obtain the services of a qualified Native American Monitor(s) 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 will be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor(s) will complete monitoring logs on a daily basis. The monitor(s) will photo-document the ground disturbing activities. The monitor(s) must also have Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) will be required to provide insurance certificates, including liability insurance, for any archaeological

resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k). 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.

## **3.6 ENERGY**

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### **3.6.1 THRESHOLDS OF SIGNIFICANCE**

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

- A potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; and,
- A conflict with or obstruction of, a State or local plan for renewable energy or energy efficiency.

### **3.6.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation? • Less than Significant Impact.*

The site is currently occupied by Eddie Kane Steel Products, Inc. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>51</sup> The proposed project is a request from Trojan Storage to construct two separate buildings with a total floor area of 213,640 square feet within the 5.39-acre site. The primary building will consist of 197,000 square feet within two floors. The new main building will occupy approximately two-thirds of the site and will contain 1,300 storage units. Two smaller buildings, with a combined floor area of 13,400 square feet, will be located in the central and easternmost portion of the project site.

Table 3-4, shown below, provides an estimate of electrical and natural gas consumption for both the existing and future land uses. As indicated in the table, the project is estimated to consume approximately 2,990,702 kilowatts (kWh) of electricity and 10,635 therms of natural gas on an annual basis.

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<sup>51</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

**Table 3-4  
Estimated Annual Energy Consumption**

Project	Consumption Rate	Total Project Consumption
<b>Existing Uses (237,372 square feet of manufacturing)</b>		
Electrical Consumption	14.06 kWh/sq. ft./year	3,337,450 kWh/year total
Natural Gas Consumption	0.05 therms/sq. ft./year	11,868 therms/year total
<b>Future Uses (213,640 square feet of public storage)</b>		
Electrical Consumption	14.06 kWh/sq. ft./year	2,990,702 kWh/year total
Natural Gas Consumption	0.05 therms/sq. ft./year	10,635 therms/year total
<b>Net Change (Existing – Future)</b>		
Electrical Consumption		- 346,748 kWh/year total
Natural Gas Consumption		- 1,233 therms/year total

Source: CEC End-Use Survey.

According to the California Commercial End-Use Survey that was prepared for the California Energy Commission, the biggest single end use with retail uses is interior lighting, followed by cooling and ventilation.<sup>52</sup> The report also indicates that heating accounts for most of the gas consumption. It is important to note that the project will include energy efficient fixtures. In addition, the energy consumption rates do not reflect the more stringent 2016 California Building and Green Building Code requirements. The proposed project will be in accordance with the City's Building Code and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. The project will include new light standards and fixtures that will be used as operational and security lighting. Adherence to the above-mentioned regulations, the impacts will be less than significant.

*B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency? • Less than Significant Impact.*

The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. As indicated previously, the project will be involved in retail sales. A majority of the energy that will be consumed by daily operations will be related to lighting. Therefore, mitigation was proposed in the previous subsection that would be effective in reducing wasteful energy consumption. Adherence to the aforementioned mitigation measures will ensure conformance with the State's goal of promoting energy and lighting efficiency. As a result, the potential impacts are considered to be less than significant.

### 3.6.3 MITIGATION MEASURES

The analysis determined that the proposed project's energy-related impacts would not be significant. As a result, no mitigation would be required.

<sup>52</sup> Intron. *California Commercial End-Use Survey*. Report dated March 2006.



## 3.7 GEOLOGY & SOILS

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### 3.7.1 THRESHOLDS OF SIGNIFICANCE

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

- Direct or indirect cause of potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides;
- Substantial soil erosion resulting in the loss of topsoil;
- The exposure of people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- Locating a project on an expansive soil, as defined in the California Building Code, creating substantial direct or indirect risks to life or property;
- Locating a project in, or exposing people to potential impacts, including soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or,
- Direct or indirect destruction of a unique paleontological resource or site or unique geological feature.

### 3.7.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides? • Less than Significant Impact.*

The City of Commerce is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake.<sup>53</sup> According to recent studies completed by the State of California Geological Survey Seismic Hazard Zones Mapping Program, the project site is located just inside an area subject to

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<sup>53</sup> California Department of Conservation. *What is the Alquist-Priolo Act.*  
<http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx>.

potential liquefaction risk as indicated in Exhibit 3-2.<sup>54</sup> The site will also be subject to strong ground motion in the event of a major earthquake. The nearest fault is the Montebello Fault, located approximately five miles to the northeast of the project site. The potential impacts from fault rupture are considered no greater for the project site than for the surrounding areas.

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). In addition, a total of 18 standard spaces and 33 R.V. parking spaces will be striped. In addition, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>55</sup>

The potential impacts resulting from fault rupture are anticipated to be less than significant. The potential impacts in regards to ground shaking would also be considered to be less than significant. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The proposed project will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from ground shaking. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located just inside an area that may subject to liquefaction. Lastly, the project site is not subject to the risk of landslides because there are no hills or mountains within the vicinity of the project site. The underlying soils are not prone to shrinking and swelling (refer to Section 3.6.2.D). As a result, the potential impact in regards to liquefaction and landslides is less than significant.

*B. Would the project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.*

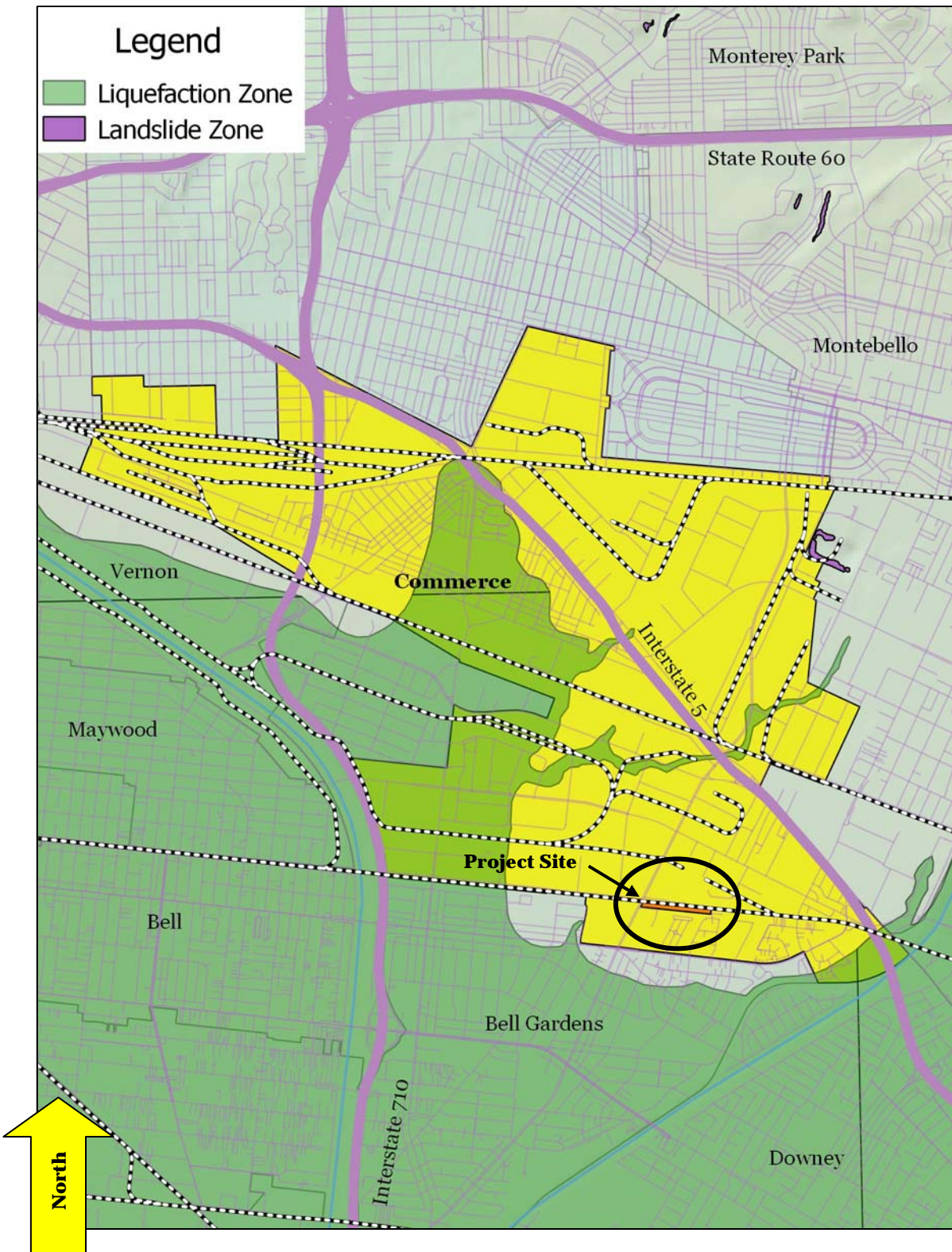
The United States Department of Agriculture's (USDA) Web Soil Survey was consulted to determine the nature of the soils that underlie the project site. The United States Department of Agriculture's (USDA) Web Soil Survey was consulted to determine the nature of the soils that underlie the project site. According to the USDA Web Soil Survey, the site is underlain by Azuvina and Montebello complex soils.<sup>56</sup> In addition, the Azuvina and Montebello complex soils are described as being used for urban development, as evident by the surrounding land uses. The site is, and would continue to be level and no slope failure or landslide impacts are anticipated to occur. Once operational, the project site would be paved over and landscaped, which would minimize soil erosion.

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<sup>54</sup> California Division of Mines and Geology. *Preliminary Map of Seismic Hazard Zones*. 1998

<sup>55</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>56</sup> United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>



**EXHIBIT 3-2**  
**SEISMIC HAZARDS MAP**  
SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION

The project Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to Federal NPDES regulations since the project would connect to the City's MS4. The SWPPP is required to apply for an NPDES General Industrial Activities Storm Water Permit (GIASP). The SWPPP will contain construction best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains. In addition, the project's contractors must adhere to any construction BMPs identified in the City's development construction program. As a result, the impacts will be less than significant.

*C. Would the project expose people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? • Less than Significant Impact.*

The project site is underlain by Azuvina and Montebello complex soils. Azuvina and Montebello complex soils are well-drained, have a slight to moderate erosion risk, have a low to medium runoff rate, and are primarily used for urban development.<sup>57</sup> Once complete, the project will not destabilize the new soils since the site will be graded, leveled, and covered over with pavement and landscaping. In addition, the surrounding area is relatively level and is at no risk for landslides. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading will not affect the proposed project because the site is located just inside an area that is subject to liquefaction. The project contractors will be required by the City to adhere to the design recommendations provided by the project's civil engineer. Lastly, the new buildings will be constructed with adherence to the most recent and stringent building code requirements. As a result, the potential impacts are considered to be less than significant.

*D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012) creating substantial direct or indirect risks to life or property? • Less than Significant Impact.*

The underlying soils consist of Azuvina and Montebello soils, which exhibit certain shrink swell characteristics. The shrinking and swelling of soils is influenced by the amount of clay present in the underlying soils.<sup>58</sup> Up to 31% of Azuvina soils consist of clay loam, while clay loam comprises up to 28% of Montebello soils.<sup>59</sup> If soils consist of expansive clay, damage to foundations and structures may occur. Foundation damage will be prevented by complying with the design recommendations provided by the project's civil engineer. As a result, the potential impacts are considered to be less than significant.

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<sup>57</sup> United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

<sup>58</sup> Natural Resources Conservation Service Arizona. *Soil Properties Shrink/Swell Potential*. [http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/az/soils/?cid=nrcs144p2\\_065083](http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/az/soils/?cid=nrcs144p2_065083)

<sup>59</sup> UC Davis. *SoilWeb: Soil Survey Browser*. [https://casoilresource.lawr.ucdavis.edu/soil\\_web/property\\_with\\_depth\\_table.php?cokey=14296138](https://casoilresource.lawr.ucdavis.edu/soil_web/property_with_depth_table.php?cokey=14296138). And UC Davis. *SoilWeb: Soil Survey Browser*. [https://casoilresource.lawr.ucdavis.edu/soil\\_web/property\\_with\\_depth\\_table.php?cokey=14296139](https://casoilresource.lawr.ucdavis.edu/soil_web/property_with_depth_table.php?cokey=14296139)

*E. Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? • No Impact.*

No septic tanks will be used as part of proposed project. However, septic tanks may be present on-site due to the age of the existing structures. Any existing septic tanks will be removed. The project will be connected to the existing sanitary sewer system. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

*F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature? • No Impact.*

No paleontological resources or geologic features are anticipated to be encountered during the project's construction phase due to the age of the soil. The soils that underlie the project site are alluvial in nature. Alluvial deposits are typically quaternary in age (from two million years ago to the present day) and span the two most recent geologic epochs, the Pleistocene and the Holocene.<sup>60</sup> As a result, no impacts to paleontological resources will occur.

### **3.7.3 MITIGATION MEASURES**

The analysis herein determined that the proposed project would not result in significant impacts related to ground shaking, liquefaction, landslides, soil erosion, lateral spreading, or subsidence. As a result, no mitigation is required for the proposed project.

## **3.8 GREENHOUSE GAS EMISSIONS**

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### **3.8.1 THRESHOLDS OF SIGNIFICANCE**

A project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

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

### **3.8.2 ENVIRONMENTAL ANALYSIS**

*A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). In addition, a total of 18 standard spaces and 33 R.V. parking

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<sup>60</sup> United States Geological Survey. *What is the Quaternary?* [http://geomaps.wr.usgs.gov/sfgeo/quaternary/stories/what\\_is.html](http://geomaps.wr.usgs.gov/sfgeo/quaternary/stories/what_is.html)

spaces will be striped. In addition, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The existing buildings include four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>61</sup>

The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions, or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler.<sup>62</sup> However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. The SCAQMD has established multiple draft thresholds of significance. These thresholds include 1,400 metric tons of CO<sub>2</sub>E (MTCO<sub>2</sub>E) per year for commercial projects, 3,500 MTCO<sub>2</sub>E per year for residential projects, 3,000 MTCO<sub>2</sub>E per year for mixed-use projects, and 7,000 MTCO<sub>2</sub>E per year for industrial projects. Table 3-5 summarizes annual greenhouse gas (CO<sub>2</sub>E) emissions from the proposed project. Carbon dioxide equivalent, or CO<sub>2</sub>E, is a term that is used for describing different greenhouses gases in a common and collective unit. As indicated in Table 3-5, the CO<sub>2</sub>E total for the project is 686 MTCO<sub>2</sub>E, which is below the aforementioned thresholds.

**Table 3-5  
Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (Lbs/Day)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> E
Long-term Area Emissions	0.04	--	--	0.04
Long-term Energy Emissions	59.64	--	--	60.00
Long-term Mobile Emissions	4,098.88	0.19	--	4,103.63
Total Long-term Emissions	<b>4,158.57</b>	<b>0.19</b>	--	<b>4,163.68</b>
Total Long-term Emissions (MTCO <sub>2</sub> e)				<b>686 MTCO<sub>2</sub>E per year</b>
<b>Thresholds of Significance</b>				<b>7,000 MTCO<sub>2</sub>E per year</b>

Source: CalEEMod V.2016.3.2

The proposed project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC).<sup>63</sup> Infill development

<sup>61</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>62</sup> California, State of. OPR Technical Advisory – CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review. June 19, 2008.

<sup>63</sup> California Strategic Growth Council. <http://www.sgc.ca.gov/Initiatives/infill-development.html>. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies.

reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the potential impacts are considered to be less than significant.

*B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.*

The City of Commerce does not presently have an adopted Climate Action Plan. AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% reduction in "business as usual" GHG emissions for the entire State. The proposed project will not involve or require any variance from the aforementioned policies. The proposed project will not introduce any conflicts with adopted initiatives that are designed to control future GHG emissions. The project is an "infill development" and is seen as an important strategy in reducing regional GHG emissions. As a result, the impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are considered to be less than significant.

### **3.8.3 MITIGATION MEASURES**

As indicated in the preceding analysis, the project's GHG emissions are below thresholds considered to represent a significant impact. Therefore, no mitigation measures are required.

## **3.9 HAZARDS & HAZARDOUS MATERIALS**

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### **3.9.1 THRESHOLDS OF SIGNIFICANCE**

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

- The creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- The creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- The generation of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Locating the project on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section §65962.5 resulting in a significant hazard to the public or the environment;



- Locating the project within an area governed by an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport that would result in a safety hazard or excessive noise for people residing or working in the project area;
- The impairment of the implementation of, or physical interference with, an adopted emergency response plan or emergency evacuation plan; or,
- The exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire.

### 3.9.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?* • *Less than Significant Impact.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). In addition, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.

The project site is not located on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).<sup>64</sup> In addition, the project site is not identified on any Leaking Underground Storage Tank database (LUST).<sup>65</sup> A search through the California Department of Toxic Substances Control's Envirostor database indicated that the project site was not included on any Federal or State clean up or Superfund lists.<sup>66</sup> The United States Environmental Protection Agency's multi-system search was consulted to determine whether the project site is identified on any Federal Brownfield list; Federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List; Federal Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Facilities List; and/or Federal RCRA Generators List. Eddie Kane Steel Company is an EPA regulated company that is present on the EPA's Resource Conservation and Recovery Act (RCRA) database and is required to submit a biannual report.<sup>67</sup>

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<sup>64</sup> CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm)

<sup>65</sup> California State Water Resources Control Board. *GeoTracker*. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=santafesprings,ca>

<sup>66</sup> CalEPA. *Envirostor*. [http://www.envirostor.dtsc.ca.gov/public/mapfull.asp?global\\_id=&x=-119&y=37&z=18&ms=640.480&mt=m&findaddress=True&city=santafesprings](http://www.envirostor.dtsc.ca.gov/public/mapfull.asp?global_id=&x=-119&y=37&z=18&ms=640.480&mt=m&findaddress=True&city=santafesprings)

<sup>67</sup> US EPA. *List of EPA - Regulated Facilities in Envirofacts*. [https://ofmpub.epa.gov/enviro/efsystemquery.multisystem?sic\\_type=Equal%20to&sic\\_code\\_to=&naics\\_type=Equal%20to&naics\\_to=&chem\\_name=&chem\\_search=Beginning%20With&cas\\_num=&page\\_no=1&output\\_sql\\_switch=FALSE&report=1&database\\_type=Multisystem&minx=-117.363579&miny=33.980459&maxx=-117.354996&maxy=33.985441&ve=16.33.982950,-117.359287](https://ofmpub.epa.gov/enviro/efsystemquery.multisystem?sic_type=Equal%20to&sic_code_to=&naics_type=Equal%20to&naics_to=&chem_name=&chem_search=Beginning%20With&cas_num=&page_no=1&output_sql_switch=FALSE&report=1&database_type=Multisystem&minx=-117.363579&miny=33.980459&maxx=-117.354996&maxy=33.985441&ve=16.33.982950,-117.359287)



Once operational, the project will not create a significant hazard to the public or the environment since no hazardous materials will be stored on-site. The rental agreement will contain specific restrictions prohibiting tenants from storing hazardous materials on-site. As a result, the potential impacts are considered to be less than significant.

*B. Would the project create a significant hazard to the public or the environment, or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? • Less than Significant Impact.*

As stated previously, Eddie Kane Steel Company is an EPA regulated company that is present on the EPA's Resource Conservation and Recovery Act (RCRA) database.<sup>68</sup> The hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. Due to the nature of the proposed project (personal self-storage), no hazardous materials will be used on-site beyond those which are used for routine cleaning and maintenance. As a result, the potential impacts are considered to be less than significant.

*C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? • No Impact.*

The project site is located within an industrial area and no schools are located within ¼ mile of the site.<sup>69</sup> The nearest schools to the site include Bell Gardens High School, located approximately 0.43 mile to the west. Because of the nature of the proposed use, no hazardous or acutely hazardous materials will be emitted. The rental agreement will prohibit future tenants from storing hazardous materials on-site. As a result, no impacts are anticipated.

*D. Would the project be located on a site, which is included on a list of hazardous material sites compiled pursuant to Government Code Section §65962.5, and, as a result, would it create a significant hazard to the public or the environment? • No Impact.*

The "Cortese List," also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the DTSC's Brownfields and Environmental Restoration Program referred to as EnviroStor. The database was consulted in July of 2018. A search of the Envirostor Hazardous Waste and Substances Site List website was completed to identify whether the project site is listed in the database as a Cortese site. The site was not identified on the list.<sup>70</sup> Therefore, no impacts will result with the implementation of the proposed project.

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<sup>68</sup> United States Environmental Protection Agency. *Multisystem Search*. Website accessed July 24, 2018.

<sup>69</sup> State of California Dept. of Conservation Division of Oil, Gas, and Geothermal Resources. *Regional Wildcat Map 101*. 1990.

<sup>70</sup> CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm).

*E. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? • No Impact.*

The project site is not 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.

*F. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? • No Impact.*

At no time will Garfield Avenue be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

*G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild land fire? • No Impact.*

As indicated previously, the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project site. The project site is located outside of any wildfire risk designation area.<sup>71</sup> As a result, no risk from wildfire is anticipated with the approval and subsequent occupation of the proposed project.

### **3.9.3 MITIGATION MEASURES**

The analysis herein also determined that the implementation of the proposed project will not result in any significant impacts related to hazards and/or hazardous materials. As a result, no mitigation is required.

## **3.10 HYDROLOGY & WATER QUALITY**

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### **3.10.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of Commerce, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on hydrology and water quality if it would result in the following:

- A violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

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<sup>71</sup> Cal Fire. *Fire Hazard Severity Zone in SRA for Los Angeles County*.  
[http://frap.fire.ca.gov/webdata/maps/los\\_angeles/fhszs\\_map.19.pdf](http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf)

- A substantial decrease of groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- A substantial alteration of the existing drainage pattern of the site or area through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner that would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows;
- Flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation; or,
- Conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

### **3.10.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? • Less than Significant Impact.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). In addition, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>72</sup>

Construction activities such as site preparation and grading may have the potential to result in the discharge of sediment, oils, residual diesel fuel, rubbish, or other contaminants of concern into the local streets and/or stormwater infrastructure. The discharge of contaminated runoff from construction will be minimized since the Applicant will be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to General Construction Activity NPDES regulations since the project would connect to the City's MS4. The SWPPP would contain additional construction Best Management Practices (BMPs) that would be the responsibility of the project Applicant to implement. Furthermore, the Applicant would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board. The mandatory SWPPP plan would identify operational Best Management Practices (BMPs) that would both reduce the volume of water discharged into the local storm drains and filter out any contaminants present in the stormwater runoff. The mandatory SWPPP plan may recommend the use of stormwater detention chambers, grate inlet filters, and bioswales as well as other mechanisms for reducing runoff and removing potential contaminants. Adherence to the aforementioned City mandated requirements would ensure that all potential impacts remain at a level that is less than significant.

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<sup>72</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

- B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge in such a way that the project may impede sustainable groundwater management of the basin? • Less than Significant Impact.*

The grading that will be done will not extend to depths required to encounter groundwater. Grading and excavation will not extend greater than six feet bgs. As a result, no dewatering will occur as part of the proposed project's construction. Therefore no direct construction related impacts to groundwater supplies or groundwater recharge activities will occur. The project will continue to be connected to the City's water lines and will not result in a direct decrease in underlying groundwater supplies. Furthermore, the project's contractors will be required to adhere to the applicable Best Management Practices (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.

- C. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows? • No Impact.*

The project's construction will be restricted to the designated project site and the project will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The Los Angeles River is the closest body of water to the project site. The Los Angeles River is located 1.5 miles to the southwest of the project site and is channelized at this location for flood control.<sup>73</sup> Once implemented, the proposed project will change the site's drainage characteristics. There are no lakes or streams within the project site or within the immediate area. The project site has undergone disturbance and no natural stream channels remain within the project site or in the immediate area. In addition, there will not be a measurable change in the quantity of storm water surface runoff conveyed to the storm drain system given the development history of the property. As a result, no impacts are anticipated.

- D. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? • No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance map obtained from the Los Angeles County Department of Public Works, the proposed project site is located in Zone X.<sup>74</sup> This flood zone has an annual probability of flooding of less than 0.2% and represents areas outside the 500-year flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain.<sup>75</sup>

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<sup>73</sup> Google Earth. Website accessed January 25, 2019.

<sup>74</sup> Los Angeles County Department of Public Works. *Flood Zone Determination Website*. <http://dpw.lacounty.gov/wmd/floodzone/>

<sup>75</sup> FEMA. *Flood Zones, Definition/Description*. <http://www.fema.gov/floodplain-management/flood-zones>

The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. A seiche in the Los Angeles River is not likely to happen due to the current level of channelization and volume of water present. In addition, the project site is located inland approximately 16 miles from the Pacific Ocean and the project area would not be exposed to the effects of a tsunami.<sup>76</sup> Portions of the City are located within the inundation area of the Garvey Reservoir, Sepulveda Reservoir, and the Hansen Reservoir. The project site is located within the potential inundation area of the Sepulveda Reservoir and the Garvey Reservoir. However, the project is not considered a critical facility. Potential overflow from the Los Angeles River may affect areas of the City though these flows are not expected to reach the project site. As a result, the project will not be subject to flood hazard impacts.

*E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? • No Impact.*

The proposed project will be in compliance with Chapter 19.33 of the City's Municipal Code. Chapter 19.33 is responsible for implementing the NPDES and MS4 stormwater runoff requirements. Furthermore, the project's contractors will be required to implement the construction BMPs identified in the mandatory SWPPP. As a result, no other impacts are anticipated and no mitigation is required.

### **3.10.3 MITIGATION MEASURES**

The analysis determined that the implementation of the proposed project would not result in any impacts related to water and hydrology impacts. As a result, no cumulative impacts are anticipated.

## **3.11 LAND USE & PLANNING**

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### **3.11.1 THRESHOLDS OF SIGNIFICANCE**

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

- The physical division and disruption of an established community; or,
- Causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

### **3.11.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project physically divide an established community? • No Impact.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet). Approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square

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<sup>76</sup> Google Earth. Website accessed January 30, 2019.

feet.<sup>77</sup> The project area is located in the midst of an industrial area located in the southern portion of the City. The following land uses and development are located near the project site:

- *North of the project site.* A Southern Pacific Railroad right-of-way extends along the project site's northern property line. A Prologis warehouse is located further north of the aforementioned railroad.
- *South of the project site.* The project site is bounded to the south by a swap meet, Mount Carmel Cemetery, and Park Lawn Cemetery.
- *East of the project site.* Single-family housing abuts the project site to the east.
- *West of the project site.* Garfield Avenue extends along the west side of the project site. A Southern California Edison substation occupies frontage along the west side of Garfield Avenue, opposite the project.<sup>78</sup>

The site is currently occupied by Eddie Kane Steel Products, Inc. The site is occupied by four main buildings and ancillary structures. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. These existing buildings have a total floor area of 237,372 square feet.<sup>79</sup> As a result, no impacts related to the division of an established residential neighborhood will occur as part of the proposed project's implementation. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur.

*B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? • No Impact.*

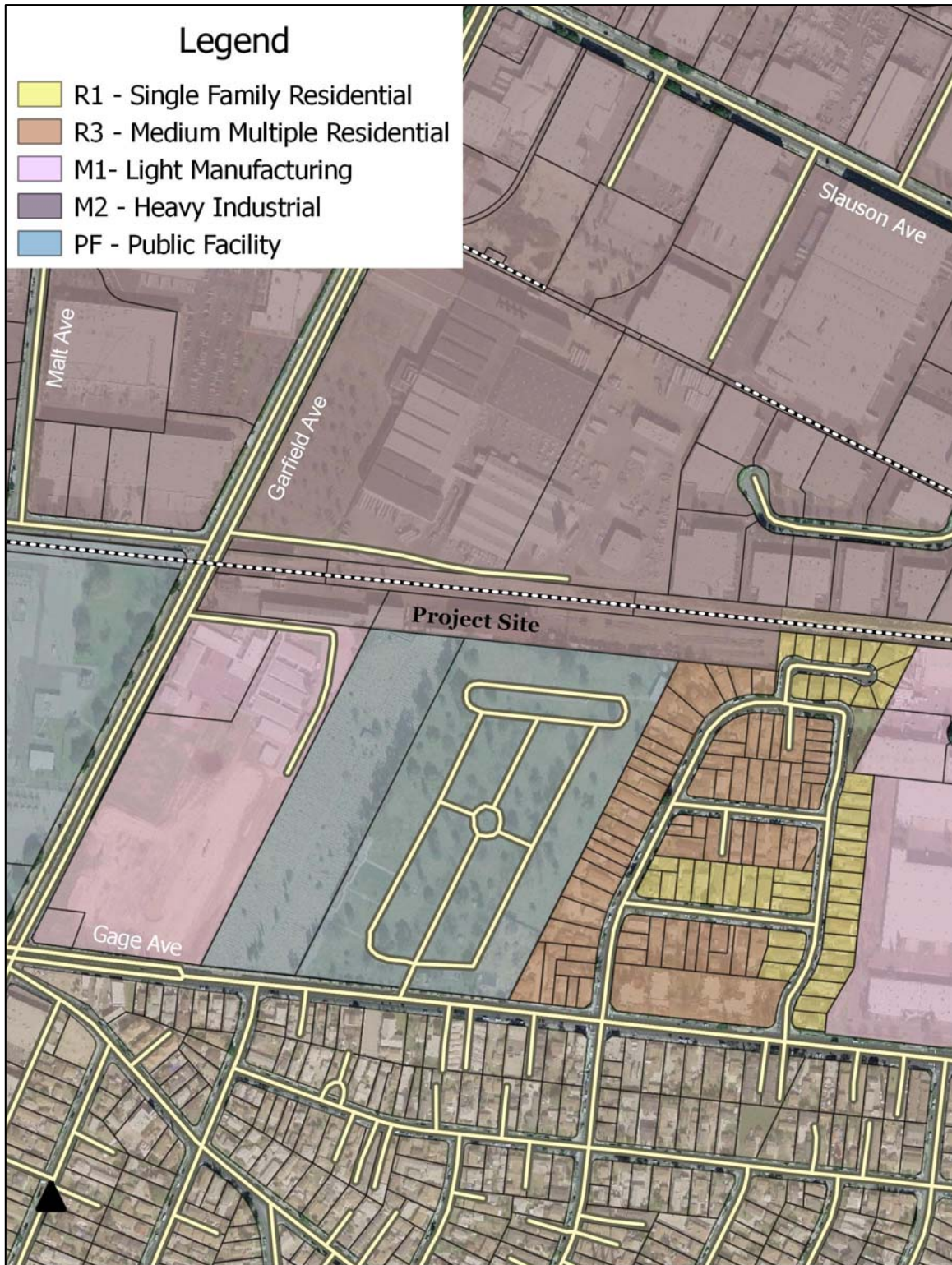
The project site is currently zoned as M2 (*Heavy Industrial*). In addition, the project site's General Plan land use designation is *Industrial*. The project site's zoning and general plan land use designations are shown in Exhibit 3-3 and Exhibit 3-4, respectively. The project's implementation will require the approval of a Conditional Use Permit (CUP) to permit storage uses within the M2 zone. The proposed project's conformity with key elements of the City of Commerce Zoning Code is outlined in Table 3-6. The table indicates that, overall, the project is in conformance to the City of Commerce Zoning Code. Based on the aforementioned findings of this analysis, the proposed use will not result in any impacts on the applicable General Plan and Zone designations and no impacts will occur.

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<sup>77</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019

<sup>78</sup> Blodgett Baylosis Environmental Planning. *Site survey*. Survey was conducted on July 20, 2018.

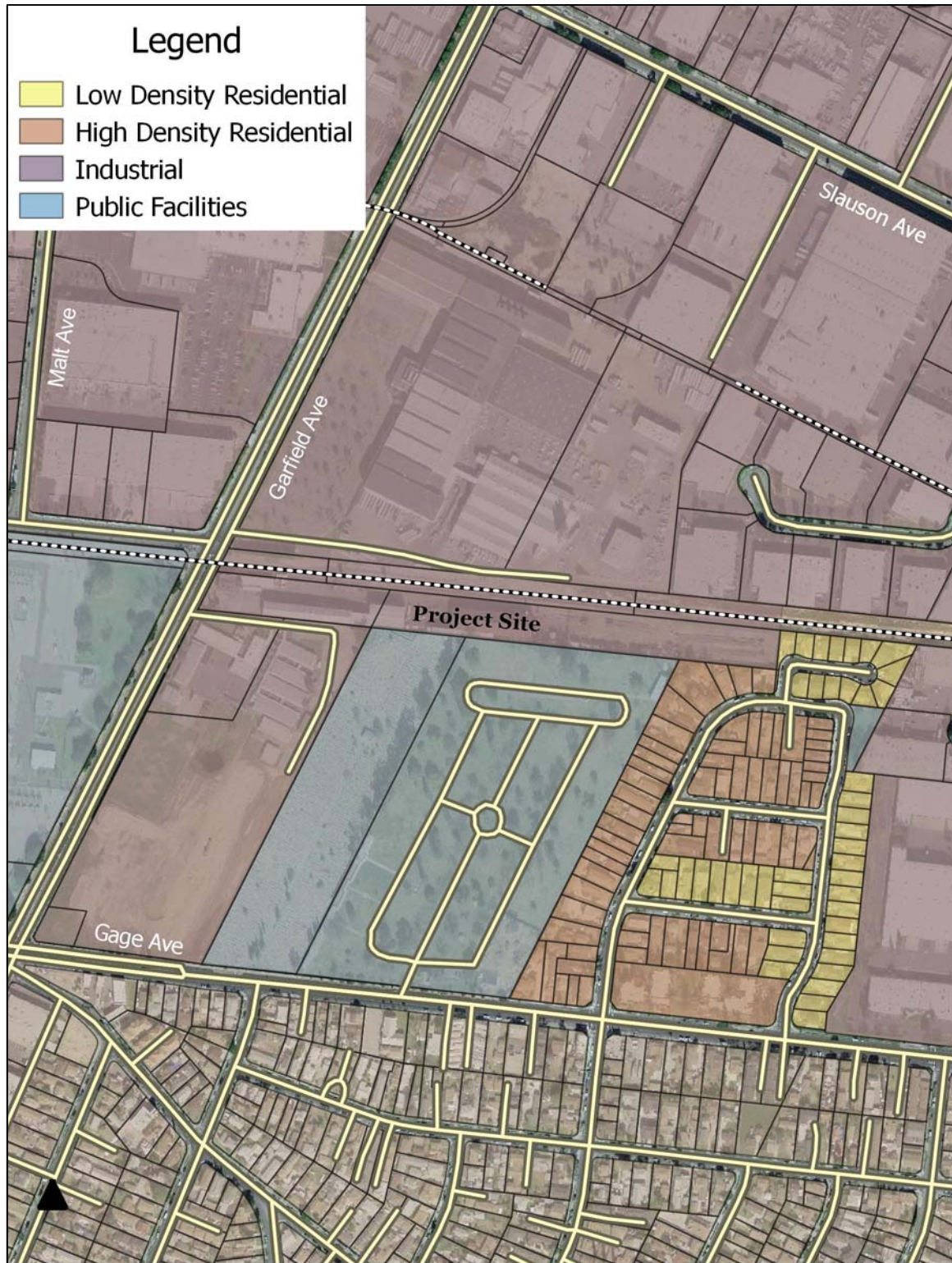
<sup>79</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019



### EXHIBIT 3-3 ZONING MAP

SOURCE: CITY OF COMMERCE AND QGIS





**EXHIBIT 3-4**  
**GENERAL PLAN MAP**  
SOURCE: CITY OF COMMERCE AND QGIS



**Table 3-6**  
**General Plan/Zoning Conformity Issues**

<b>Issue<sup>1</sup></b>	<b>Description</b>	<b>Findings</b>
Land Use	The proposed project will be required to conform to the City's Zoning Ordinance.	The proposed use is conditionally permitted under the current M2 zoning.
Floor Area Ratio	The maximum FAR for the site is 1.0 pursuant to the applicable zoning code requirements.	The FAR for the proposed project is 0.90 to 1.0 which is less than the maximum permitted under the current Zoning.
Building Height	The maximum height of the new development cannot exceed 50 feet.	The building's height overall will be approximately 35 feet
Landscaping	The applicable zoning calls for 5% of the total lot area to be landscaped.	Landscaping will total 10.5% of the total site area which exceeds the City requirement.
Building Setbacks	The applicable zoning requires a 15-foot setback from Garfield Avenue.	The front yard setback will exceed 15 feet.

Source: City of Commerce Zoning Code, 2006.

### 3.11.3 MITIGATION MEASURES

The analysis determined that the proposed project will not result in any significant land use impacts. As a result, no mitigation is required for the project.

## 3.12 MINERAL RESOURCES

### 3.12.1 THRESHOLDS OF SIGNIFICANCE

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

- The loss of availability of a known mineral resource that would be of value to the region and the residents of the State; or,
- The loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

### 3.12.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?* • No Impact.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.<sup>80</sup> In addition, according to the Significant Mineral Aggregate Resource Area (SMARA) study area maps prepared by the California Geological Survey, the City of Commerce is located within the larger San Gabriel Valley SMARA (identified as the Portland cement concrete-grade aggregate).

<sup>80</sup> California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*. <https://maps.conservation.ca.gov/doggr/wellfinder/#close>. Site accessed on July 25, 2018

However, as indicated in the San Gabriel Valley P-C region MRZ-2 map, the project sites are not located in an area where there are significant aggregate resources present. In addition, the project sites are not located in an area with active mineral extraction activities. As a result, no impacts will occur.

*B. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? • No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the boundaries of the project site. There are no mineral, oil, or energy extraction and/or generation activities located within the project site or in the immediate area. Review of maps provided by the State Department of Conservation indicates there are no active or abandoned wells within the project site. The resources and materials used in the construction of the proposed project will not include any materials that are considered rare or unique. Thus, the proposed project will not result in any significant adverse effects on mineral resources in the region. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

### **3.12.3 MITIGATION MEASURES**

The analysis determined that the proposed project would not result in any impacts on mineral resources. As a result, no project mitigation is required relative to mineral resources.

## **3.13 NOISE**

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### **3.13.1 THRESHOLDS OF SIGNIFICANCE**

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

- The generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies; or,
- The generation of excessive vibration or ground-borne noise levels.

### **3.13.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

*A. Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Less than Significant Impact with Mitigation.*

Trojan Storage is proposing to construct two storage buildings totaling 213,640 square feet of floor area within a 5.39-acre (234,690 square feet) site. In addition, a total of 18 standard spaces and 33 R.V.

parking spaces will be striped. Finally, approximately 15,415 square feet of open space representing 6.5% of the site will be provided. The site is currently occupied by Eddie Kane Steel Products, Inc. The western portion of the site is paved while the eastern portion not occupied by building is unpaved. The site is occupied by four main buildings and ancillary structures with a total floor area of 237,372 square feet.<sup>81</sup>

Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Noise levels that are associated with common, everyday activities are illustrated in Exhibit 3-5. Typical construction noise levels are shown in Exhibit 3-6.

Construction noise levels would decline as one move away from the noise source in phenomenon known as *spreading loss*. Noise subject to spreading loss experiences a 6.0 dBA reduction for every doubling of the distance beginning with the initial 50-foot distance. The nearest sensitive receptors to the project site include the residential neighborhood that abuts the site to the east. The project's construction noise levels were estimated using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model Version 1.1. The pieces and number of equipment that will be utilized was taken from the CalEEMod worksheets prepared for this project. The distance used between the construction activity and the nearest sensitive receptors varied depending on the individual equipment. As indicated by the model, the project's construction will result in average ambient noise levels of up to 83 dBA at the nearest sensitive receptor. As a result, the following mitigation is required:



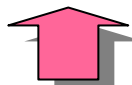
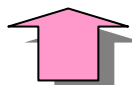
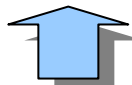
- The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and panels around the engine and vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.

The first mitigation measure calls for the use of sound suppressing equipment. For example, a typical excavator will produce noise levels of around 80.5 dBA at a distance of 50 feet. In the quietest configuration, with improved exhaust and intake muffling, fan disengaged, and three sound panels around the engine, the overall level was reduced to 71.5 dBA at a distance of 50 feet.<sup>82</sup> Furthermore, regular maintenance of construction equipment will ensure noise levels do not increase over time. Adherence to the aforementioned mitigation will reduce potential construction impacts to levels that are less than significant.

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<sup>81</sup> Los Angeles County Tax Assessor. <https://portal.assessor.lacounty.gov/parceldetail/6357001050>. Website accessed on January 16, 2019.

<sup>82</sup> Laborers' Health and Safety Fund of North America. *Controlling Noise on Construction Sites*. <https://www.lhsfna.org/LHSFNA/assets/File/bpguide%202014.pdf>

 <b>Serious Injury</b>	165	
	160	
	155	
	150	
 <b>Pain</b>	145	
	140	<i>sonic boom</i>
	135	
	130	
	125	<i>jet take off at 200 ft.</i>
	120	
 <b>Discomfort</b>	115	<i>music in night club interior</i>
	110	<i>motorcycle at 20 ft.</i>
	105	<i>power mower</i>
	100	
	95	<i>freight train at 50 ft.</i>
	90	<i>food blender</i>
 <b>Range of Typical Noise Levels</b>	85	<i>electric mixer, light rail train horn</i>
	80	
	75	
	70	<i>portable fan, roadway traffic at 50 ft.</i>
	65	
	60	<i>dishwasher, air conditioner</i>
	55	
	50	<i>normal conversation</i>
	45	<i>refrigerator, light traffic at 100 ft.</i>
	40	
	35	<i>library interior (quiet study area)</i>
	30	
 <b>Threshold of Hearing</b>	25	
	20	
	15	
	10	<i>rustling leaves</i>
	5	
	0	

## EXHIBIT 3-5 TYPICAL NOISE SOURCES AND LOUDNESS SCALE

Source: Blodgett Baylosis Environmental Planning

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

## EXHIBIT 3-6

### TYPICAL CONSTRUCTION NOISE LEVELS

Source: Blodgett Baylosis Environmental Planning

The noise environment within the project site is dominated by traffic noise from Garfield Avenue. No audible change in traffic noise levels from existing levels is expected to be perceptible over the long-term given the projected traffic generation. Typically, a doubling in traffic volumes is required to generate an audible increase traffic noise levels.

In a normal urbanized environment, changes in traffic noise levels of less than 3.0 dB are not typically perceptible. The traffic analysis indicates the proposed project would result in less than a one percent increase in traffic overall for the segment of Garfield Avenue. As a result, the potential operational impacts are considered to be less than significant.

*B. Would the project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? • Less than Significant Impact.*

As indicated in the construction noise model, none of the equipment that will be used during the project's construction is classified as an impact device. In addition, much of the construction and demolition activities will occur over 40 feet from the nearest sensitive receptors. As a result, vibration from construction is expected to generate less than significant impacts. Once operational, the project's traffic will not be sufficient enough to result in an increase in roadway noise or vibration. In a normal urbanized environment, changes in traffic noise levels of less than 3.0 dB are not typically perceptible. The traffic analysis indicates the proposed project would result in less than a one percent increase in traffic overall for the segment of Garfield Avenue. As a result, the potential operational impacts are considered to be less than significant.

### **3.13.3 MITIGATION MEASURES**

The noise analysis indicates that the following mitigation measure will be required:

*Mitigation Measure No. 5 (Noise Impacts).* The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and panels around the engine and vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.

## **3.14 POPULATION & HOUSING**

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### **3.14.1 THRESHOLDS OF SIGNIFICANCE**

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

- A substantial growth in the unplanned population within an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of new homes or infrastructure) related to a project; or,

- The displacement of a substantial number of existing people or housing units, necessitating the construction of replacement housing.

### **3.14.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of new homes or infrastructure related to a project)? • No Impact.*

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently being used as an outdoor storage facility. In addition, the site is located in the midst of an urban area.
- *Extension of roadways and other transportation facilities.* The project will utilize the existing roadways, driveways, and sidewalks.
- *Extension of infrastructure and other improvements.* The project will utilize the existing infrastructure though new utility line connections will be installed. The installation of these new utility lines will not lead to subsequent development.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.
- *The removal of housing requiring replacement housing elsewhere.* The site is vacant and there are no housing units located on-site.
- *Additional population growth leading to increased demand for goods and services.* The project will not lead to any direct increase in the City's population since no housing will be provided.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project is an infill development that will utilize existing roadways and infrastructure. The project will not lead to any direct increase in the City's population since no housing units are proposed. In addition, the number of new jobs that will be created is within the employment generation estimated by SCAG. As a result, no impacts will occur.

*B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? • No Impact.*

No housing units will be displaced as a result of the proposed project's implementation. The site is currently vacant and is currently being used as a storage and maintenance yard. Therefore, no impacts will result.

### **3.13.4 MITIGATION MEASURES**

The analysis of potential population and housing impacts indicated that no significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

## **3.15 PUBLIC SERVICES**

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### **3.15.1 THRESHOLDS OF SIGNIFICANCE**

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

- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to *fire protection services*;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to *police protection services*;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to *school services*; or,
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to other *public facilities*.



### **3.15.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

- A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to fire protection services? • Less than Significant Impact.*

The City of Commerce contracts with the Los Angeles County Fire Department for fire protection and emergency services. Response times are approximately three minutes throughout the City. Resources from these additional stations as well as others operated by the Los Angeles County Fire Department would be made available if needed. The proposed project, once operational, will also be periodically inspected by the Fire Department. In addition, the Los Angeles County Fire Department will review the development plans to ascertain the nature and extent of any additional requirements. Compliance with fire code requirements and the approval of the installation plan by the Los Angeles County Fire Department will mitigate any potential impacts. As a result, the impacts will be less than significant.

- B. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives relative to police protection services? • Less than Significant Impact with Mitigation.*

The Los Angeles County Sheriff's Department, under contract with the City of Commerce, provides law enforcement services in the City. The City and project site, are served by the East Los Angeles Station, located at 5019 East Third Street in East Los Angeles. The proposed project could place additional demands on law enforcement services due to the nature of the project. However, the project's potential impacts on law enforcement services are considered less than significant with adherence to the following mitigation:

- The final site plan, elevations, building floor plans, and site circulation must be reviewed by the Los Angeles County Sheriff's Department to ensure it conforms to their operational requirements.
- The Applicant will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.

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

- C. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives relative to school services?* • *Less than Significant Impact.*

Assuming a student generation rate of 0.498 students per employee, and a net employment generation of 11 jobs, the potential theoretical new student generation will be less than six students. The Applicant will be required to pay school district development fees. As a result, the proposed project's impacts on school facilities are considered to be less than significant.

- D. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in other governmental services?* • *No Impact.*

No new governmental services will be needed to implement the proposed project since the proposed project will not introduce any new development. As a result, no impacts are anticipated.

### **3.15.3 MITIGATION MEASURES**

The analysis determined that the proposed project would not result in any significant impact on public except on law enforcement services. The following measure will be required to enhance security:

*Mitigation Measure No. 6 (Law Enforcement).* The final site plan, elevations, building floor plans, and site circulation must be reviewed by the Los Angeles County Sheriff's Department to ensure it conforms to their operational requirements.

*Mitigation Measure No. 7 (Law Enforcement).* The Applicant will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.

## **3.16 RECREATION**

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### **3.16.1 THRESHOLDS OF SIGNIFICANCE**

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

- The use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or,
- The construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

### **3.16.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

- A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? • No Impact.*

The nearest park to the project site is Bristow Park located approximately 2,100 feet to the west next to Las Palmas School. The proposed project will not result in a direct demand for park facilities based on the proposed use. As a result, no changes in the demand for local parks and recreation facilities are anticipated.

- B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? • No Impact.*

The proposed project will not result in a direct demand for park facilities. As a result, no changes in the demand for local parks and recreation facilities are anticipated and no impacts are anticipated.

### **3.16.3 MITIGATION MEASURES**

The analysis determined that the proposed project would not result in any significant impact on recreational facilities and services. As a result, no mitigation is required.

## **3.17 TRANSPORTATION & CIRCULATION**

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### **3.17.1 THRESHOLDS OF SIGNIFICANCE**

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

- A conflict with a plan, ordinance, or policy establishing measures for addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths;
- A conflict or inconsistency with CEQA Guidelines §15064.3 subdivision (b)(1) for a land use project;
- A conflict with or inconsistency with CEQA Guidelines §15064.3 subdivision (b)(2) for a transportation project;
- Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or,
- Results in inadequate emergency access.

### 3.17.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a conflict with a plan, ordinance, or policy establishing measures of effectiveness addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?* • *Less than Significant Impact.*

The project would provide vehicular access to the parking and loading via a driveway located on the east side of Garfield Avenue. The following paragraphs provide a brief description of the existing roadways which comprise the circulation network of the study area, providing the majority of both regional and local access to the project.<sup>83</sup>

- *Garfield Avenue.* Garfield Avenue is a north-south major arterial roadway with two (2) travel lanes in each direction. The street is approximately 78 feet wide and its posted speed limit is 40 miles per hour. Directional travels are separated by either median island or two-way left-turn lane. Parking is restricted along both curb lines.
- *Telegraph Road.* Telegraph Road is a northwest-southeast major arterial street and striped with two (2) travel lanes in each direction. The street is 84 feet wide and posted with a speed limit of 45 miles per hour. Directional travels are separated by a yellow line lane along the center of the roadway. The intersection with Garfield Avenue is signalized. Parking is prohibited along both sides of the street.
- *Bandini Boulevard.* Bandini Boulevard is an east-west major arterial roadway and striped with two (2) travel lanes in each direction. The street is 64 feet wide and has a posted speed limit of 40 miles per hour. Directional travels are separated by a yellow line lane along the center of the street. The intersection with Garfield Avenue is signalized. Parking is prohibited along both sides of the street.
- *Slauson Avenue.* Slauson Avenue is an east-west major arterial street with two (2) travel lanes in each direction. The roadway is 76 to 82 feet wide and posed with 45 miles per hour speed limit. Directional travels are separated by two-lane left-turn lane along the roadway. The intersection at Garfield Avenue is signalized. Parking is partially restricted along both sides of the street.
- *Randolph Street.* Randolph Street is an east-west collector street and striped with two (2) travel lanes in each direction. The roadway is 60 feet wide and posed with 45 miles per hour speed limit. Directional travels are separated by a yellow line lane along the center of the street. The intersection with Garfield Avenue is signalized. Parking is permitted on the north while prohibited on the south side of the street.
- *Gage Avenue.* Gage Avenue is an east-west secondary arterial street and striped with two (2) travel lanes in each direction. The roadway is 64 feet wide. The posted speed limit is 35 miles per hour. Directional travels are separated by either raised median or two-lane left-turn lane

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<sup>83</sup> Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report.* January 2019.

along the center of the street. The intersection at Garfield Avenue is signalized. Parking is mostly prohibited on both sides of the street.

For the purpose of evaluating existing operating conditions as well as future operating conditions with and without the proposed project, the study area was carefully selected in accordance with local traffic study guidelines and consultation with City staff. Manual turning movement counts for the selected intersections were collected in the during the morning and evening peak periods during the month of January 2019. The peak hours for the counts were 7:00 to 9:00 AM and 4:00 to 6:00 PM. It was determined that the following five key intersections would be analyzed in the study:<sup>84</sup>

- Garfield Avenue and Randolph Street (Signalized);
- Garfield Avenue and Gage Avenue (Signalized);
- Garfield Avenue and Slauson Avenue (Signalized);
- Garfield Avenue and Bandini Boulevard (Signalized); and,
- Garfield Avenue and Telegraph Road (Signalized).

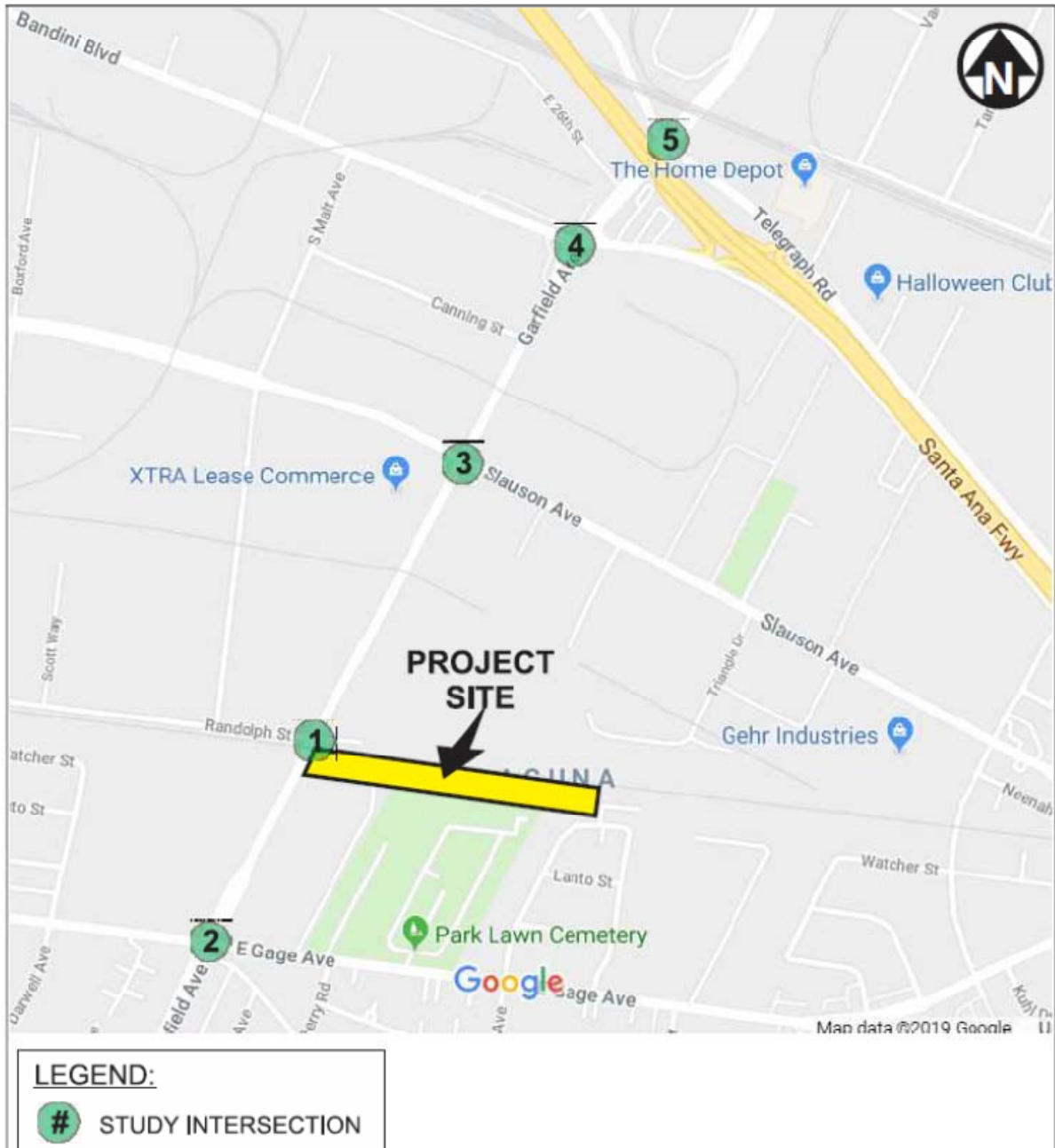
The locations of study intersections are shown in Exhibit 3-7. Existing lane configurations at the study intersections are shown in Exhibit 3-8. Existing turning movement counts for AM and PM peak hour conditions are shown in Exhibit 3-9. Detailed turning movement counts are included in the Appendix-A of the traffic study. Year 2019 existing traffic conditions were evaluated using the Intersection Capacity Utilization (ICU) method for signalized intersections and Highway Capacity Manual (HCM) method for unsignalized intersections. Table 3-7 presents the existing condition intersection level of service analysis summary. Detailed calculations relating to the study intersections are included in the Technical Appendix of the Traffic Study. As shown in the Table 3-7 the study intersections are currently operating at a Level of Service (LOS) D or better during both the AM and PM peak hours at all the five (5) key intersections.

**Table 3-7**  
**Existing Conditions (2019) Level of Service Summary**

Intersection	Intersection Control Type	Peak Hour	Existing 2019 Conditions	
			LOS	V/C Ratio
1. Garfield Ave. & Randolph St.	Signalized	AM PM	A B	0.541 0.669
2. Garfield Ave. & Gage Ave.	Signalized	AM PM	C D	0.738 0.855
3. Garfield Ave. & Slauson Ave.	Signalized	AM PM	D C	0.808 0.790
4. Garfield Ave. & Bandini Blvd.	Signalized	AM PM	B D	0.624 0.824
5. Garfield Ave. & Telegraph Rd,	Signalized	AM PM	B B	0.652 0.690

Source: Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report*. January 2019

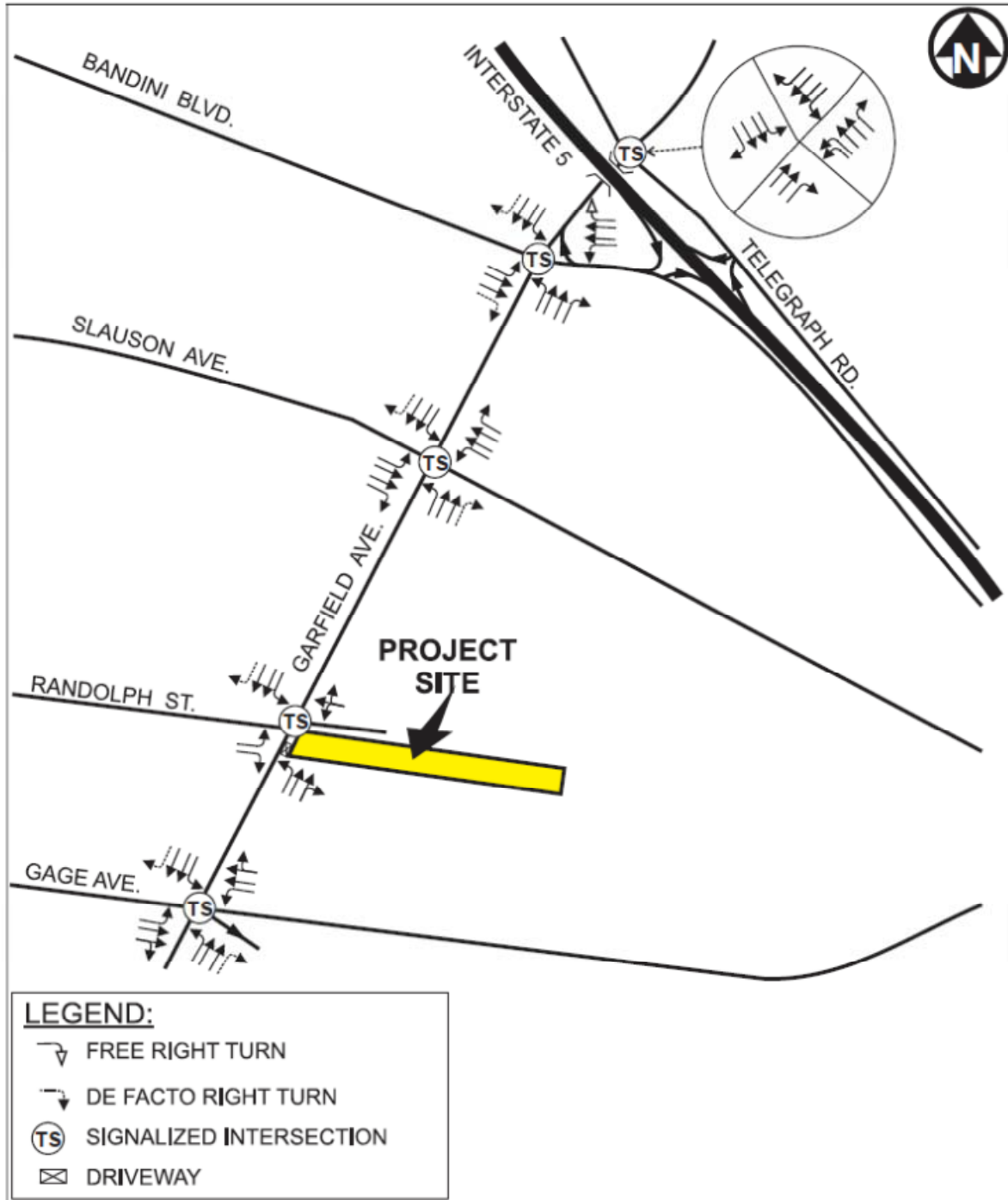
<sup>84</sup> Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report*. January 2019.



### EXHIBIT 3-7

## STUDY INTERSECTION LOCATIONS

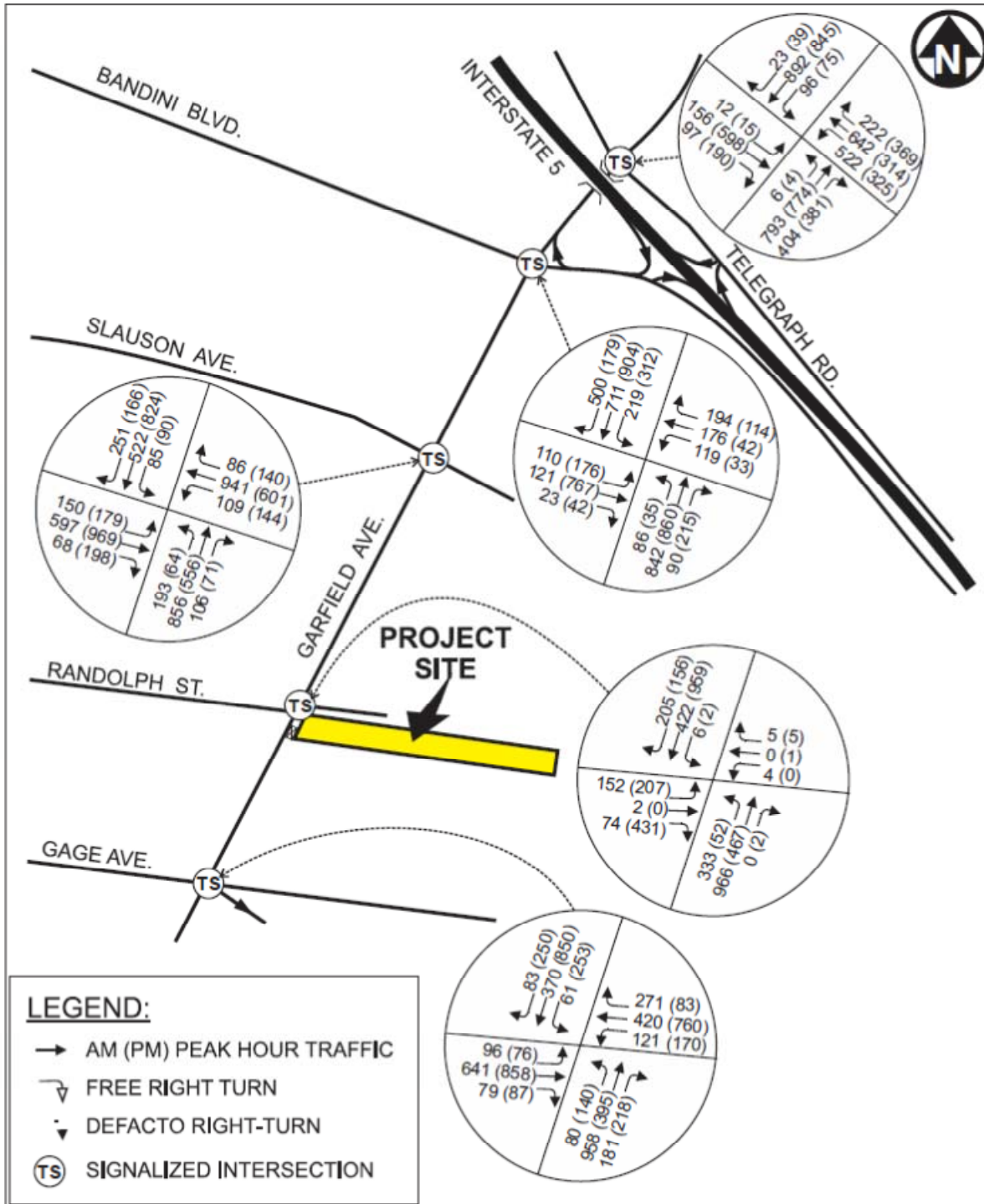
Source: Crown City Engineers, Inc.



### EXHIBIT 3-8

## LANE CONFIGURATION OF STUDY INTERSECTIONS

Source: Crown City Engineers, Inc.



### EXHIBIT 3-9

## EXISTING PEAK HOUR TURNING MOVEMENT COUNTS

Source: Crown City Engineers, Inc.



A 1.0 percent per year ambient traffic growth rate was applied to existing traffic volumes to create a 2019 base condition (i.e., a factor of 1.01 was applied to 2019 volumes to obtain 2020 base traffic volumes). This ambient traffic growth rate accounts for the population growth and any other unknown traffic generators within the study area. There are three cumulative projects in the vicinity of this proposed project. This pre-project traffic condition with the above cumulative projects was evaluated using the Intersection Capacity Utilization (ICU) method for signalized intersections. Detailed calculations for the study intersections are included in the Technical Appendix of the Traffic Study. The LOS and V/C ratios for the study intersections under 2020 pre-project conditions with cumulative projects (without project) are shown in Table 3-8. As shown in Table 3-8, all the study intersections are expected to be operating at LOS D or better during both the AM and PM peak hours.<sup>85</sup>

**Table 3-8**  
**Future 2020 Pre-Project with Cumulative Projects Level of Service Summary**

Intersection	Intersection Control Type	Peak Hour	2020 Pre-project Conditions	
			LOS	V/C Ratio
1. Garfield Ave. & Randolph St.	Signalized	AM PM	A B	0.547 0.682
2. Garfield Ave. & Gage Ave.	Signalized	AM PM	C D	0.747 0.867
3. Garfield Ave. & Slauson Ave.	Signalized	AM PM	D C	0.820 0.803
4. Garfield Ave. & Bandini Blvd.	Signalized	AM PM	B D	0.634 0.841
5. Garfield Ave. & Telegraph Rd,	Signalized	AM PM	B D	0.658 0.701

Source: Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report*. January 2019

In order to accurately assess future traffic conditions with the proposed project, trip generation estimates were developed for the project. Trip generation rates are based on nationally recognized recommendations contained in “Trip Generation” handbook, 10<sup>th</sup> edition, published by the Institute of Transportation Engineers (ITE). Table 3-9 show a summary of trip generation estimates for the project.

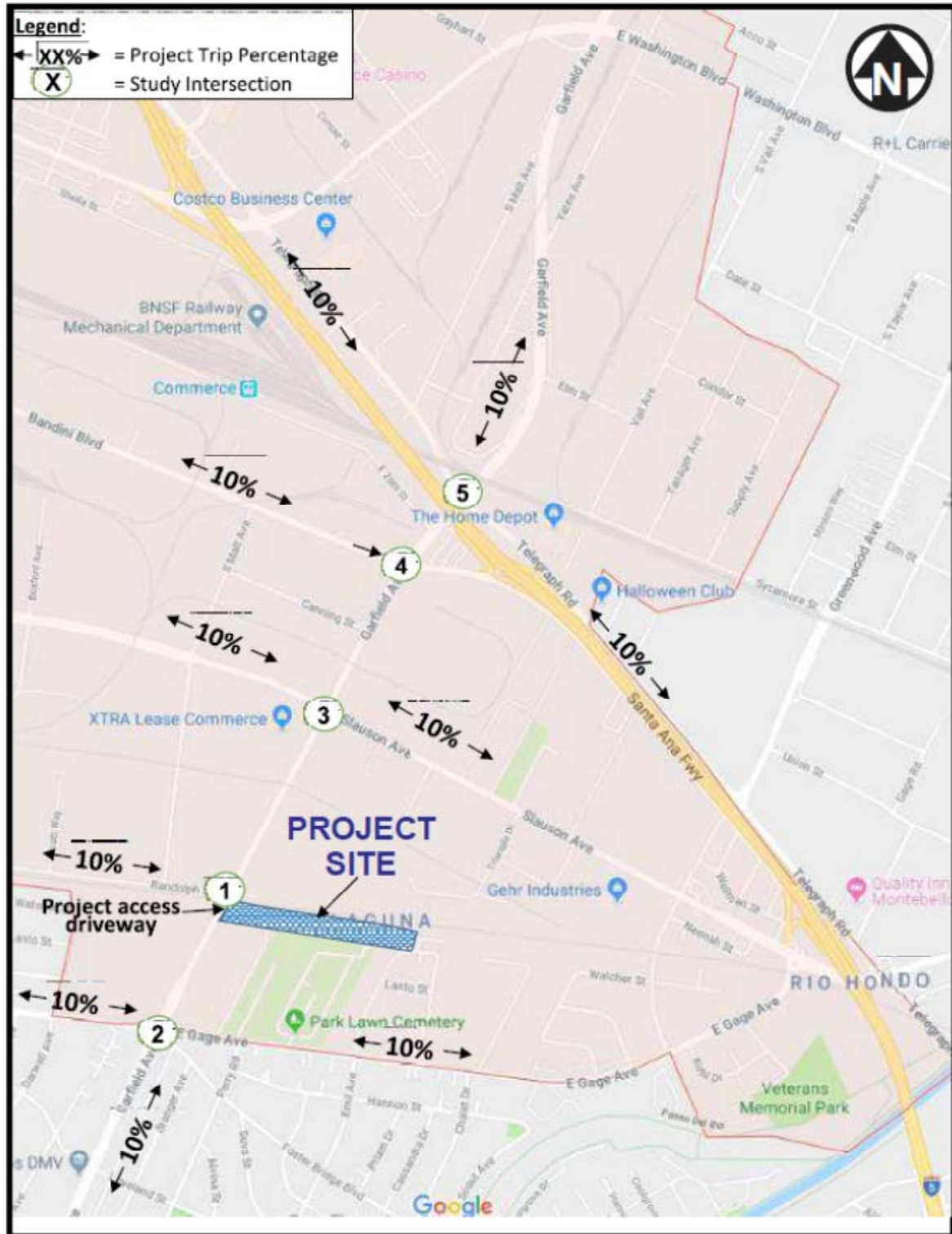
**Table 3-9**  
**Trip Generation for the Proposed Project**

ITE Code	Size	Trip Generation Rate							Average Traffic Volume						
		Daily Total	AM Peak Hour			PM Peak Hour			Daily Total	AM Peak Hour			PM Peak Hour		
			%in	%out	total	%in	%out	total		%in	%out	total	%in	%out	total
151	212.71 ksf.	1.51	60%	40%	0.1	47%	53%	0.17	322	13	9	21	17	19	36

Source: Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report*. January 2019

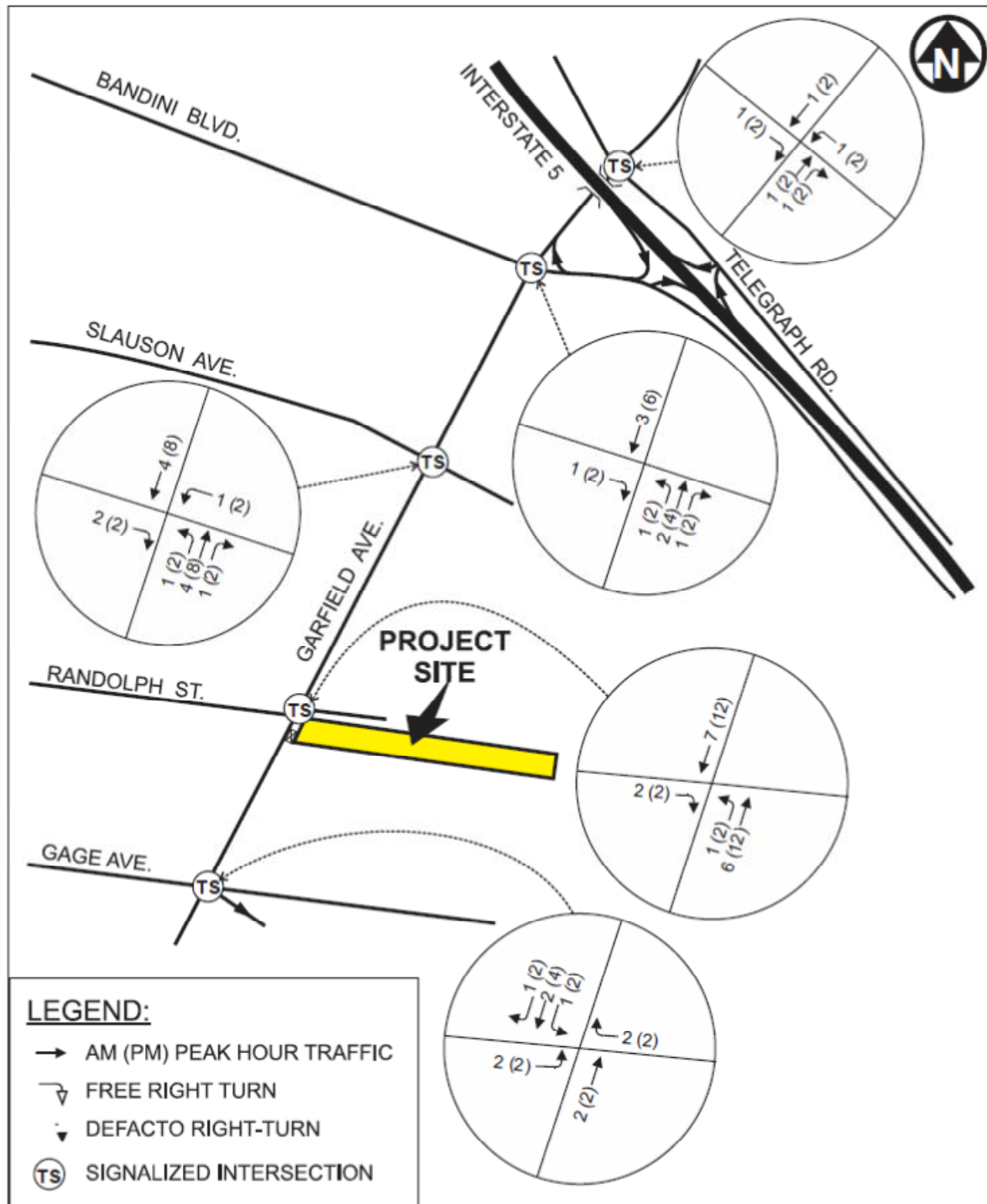
Arrival and departure distribution patterns for project-generated traffic were estimated based upon a review of circulation patterns within the study area network and regional traffic generation and attraction characteristics. Exhibit 3-10 depicts the regional trip distribution percentages to and from the site. Exhibit 3-11 presents the project traffic volume.

<sup>85</sup> Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report*. January 2019.



## EXHIBIT 3-10 PERCENTAGE DISTRIBUTION

Source: Crown City Engineers, Inc.



### EXHIBIT 3-11

## PROJECT TRAFFIC VOLUME

Source: Crown City Engineers, Inc.

Future (2020) with cumulative project plus project traffic conditions were evaluated using the Intersection Capacity Utilization (ICU) method for signalized intersections and Highway Capacity Manual (HCM) method for unsignalized intersections. Detailed calculations relating to the study intersections are included in the Technical Appendix provided in the Traffic Study. The LOS and V/C ratios for the study intersections under future plus project conditions are summarized in Table 3-10.

**Table 3-10**  
**Future 2019 Level of Service Summary Without Project & Project and Cumulative Project**

Intersection	Control Type	Peak Hour	Existing 2019 Conditions		2020 Pre-Project Future Conditions		2020 Future with Project Conditions		Increase in V/C by Project
			LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	
1. Garfield Ave. & Randolph St.	Signalized	AM PM	A B	0.541 0.669	A B	0.547 0.682	A B	0.550 0.687	0.003 0.005
2. Garfield Ave. & Gage Ave.	Signalized	AM PM	C D	0.738 0.855	C D	0.747 0.867	C D	0.749 0.868	0.002 0.001
3. Garfield Ave. & Slauson Ave.	Signalized	AM PM	D C	0.808 0.790	D C	0.820 0.803	D D	0.821 0.808	0.001 0.005
4. Garfield Ave. & Bandini Blvd.	Signalized	AM PM	B D	0.624 0.824	B D	0.634 0.841	B D	0.635 0.843	0.001 0.002
5. Garfield Ave. & Telegraph Rd.	Signalized	AM PM	B B	0.652 0.690	B B	0.658 0.701	B B	0.659 0.702	0.001 0.001

Source: Crown City Engineering, Inc.

As shown in Table 3-10, all the five study intersections are expected to operate at a Level of Service (LOS) D or better. Therefore, the project is not expected to have significant impacts at all the key intersections and the potential impacts are considered to be less than significant.<sup>86</sup>

*B. For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? • Less than Significant Impact.*

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact. The project's implementation will have less than significant impacts since the project will recycle existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the potential impacts are considered to be less than significant.

<sup>86</sup> Crown City Engineers, Inc. *Trojan Self-Storage Development: Traffic Impact Analysis (TIA) Report*. January 2019.

*C. For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)? • No Impact.*

According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact. Since the project is part of an infill development, no impacts will occur as part of the proposed project's implementation.

*D. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? • Less than Significant Impact with Mitigation.*

Access to the project site will be provided by an existing driveway located along the east side of Garfield Avenue. Vehicles travelling southbound on Garfield Avenue can access the site from by executing a left-turn from a left-turn pocket located south of the existing railroad right-of-way. However, egress from the site is limited due to the presence of the aforementioned left-turn pocket. Vehicles making a left-turn from the driveway onto southbound Garfield Avenue would have to cross the left-turn pocket as well as two travel lanes extending northbound. Therefore, in order to prevent potential collisions, the following mitigation is required:

- A sign prohibiting the execution of left-turns from the site's main driveway must be installed.

Adherence to the aforementioned mitigation will minimize the risk posed by poor roadway design. Once operational, the project will not introduce incompatible uses or equipment since the site is occupied by an existing industrial use and is located in the midst of an industrial area. No large trucks will travel to the site due to the nature of the proposed project. As a result, the potential impacts are considered to be less than significant.

*E. Would the project result in inadequate emergency access? • No Impact.*

The project would not affect emergency access to any adjacent parcels. At no time will Garfield Avenue be closed to traffic. As a result, the proposed project's implementation will not result in any impacts.

### **3.17.3 MITIGATION MEASURES**

The analysis determined that the project would require the following mitigation to address traffic and circulation impacts:

*Mitigation Measure No. 8 (Transportation & Circulation Impacts).* A sign prohibiting the execution of left-turns from the site's main driveway must be installed.

### 3.18 TRIBAL CULTURAL RESOURCES

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#### 3.18.1 THRESHOLDS OF SIGNIFICANCE

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

- A substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,
- A substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

#### 3.18.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?* • *Less than Significant Impact.*

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

The mitigation identified in Section 3.5.2.B will be sufficient in protecting potential tribal cultural resources. As a result, the potential impacts are considered to be less than significant.

*B. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? • Less than Significant Impact.*

The mitigation identified in Section 3.5.2.B will be sufficient in protecting potential tribal cultural resources. As a result, the potential impacts are considered to be less than significant.

### **3.18.3 MITIGATION MEASURES**

The analysis of tribal cultural resources indicated that no significant impacts would result with the implementation of the proposed project. As a result, no mitigation is required.

## **3.19 UTILITIES & SERVICE SYSTEMS**

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### **3.19.1 THRESHOLDS OF SIGNIFICANCE**

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

- The relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts;
- Insufficient water supplies to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years;
- 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;

- The generation of solid waste in excess of State or local standards or in excess of the capacity of local infrastructure;
- A negative impact on the provision of solid waste services or impair the attainment of solid waste reduction goals; or,
- Compliance with Federal, State, and local management and reduction statutes and regulations related to solid waste.

### 3.19.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental impacts?* • *No Impact.*

The project site is presently occupied by Eddie Kane Steel. There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. In addition, the increase in demand for waste disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required (refer to the following subsections). As a result, no impacts will occur.

B. *Would the project have sufficient water supplies available to serve the project and the reasonably foreseeable future development during normal, dry, and multiple dry years?* • *Less than Significant.*

The proposed project will be required to install water efficient fixtures. In addition, the Applicant must plant drought tolerant landscaping. As shown in Table 3-11, the existing use currently consumes an average of 23,737 gallons of water on a daily basis. The proposed project is anticipated to consume an average of 5,317 gallons of water per day, which is a decrease in consumption of 18,420 gallons of water per day over the existing conditions.

**Table 3-11**  
**Water Consumption (gals/day)**

Use	Unit	Factor	Generation
Existing Industrial/Manufacturing	237,372 sq. ft.	100 gallons/1,000 sq. ft./day	23,737 gals/day
Proposed Project	213,640 sq. ft.	25 gallons/1,000 sq. ft./day	5,317 gals/day
<b>Net Increase/Decrease</b>	-24,662 sq. ft.		-18,420 gals/day

Source: City of Los Angeles CEQA Thresholds Guide

This decrease in water consumption can be accommodated by the existing water purveyors. As a result, the potential impacts are considered to be less than significant.



- C. *Would the project result in a determination by the wastewater treatment provider, which 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?* • *Less than Significant Impact.*

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

As shown in Table 3-12, the existing use currently generates an average of 18,989 gallons of wastewater on a daily basis. The proposed project is anticipated to generate an average of 4,254 gallons of water per day, which is a decrease in consumption of 14,735 gallons of water per day over the existing conditions.

**Table 3-12**  
**Wastewater Generation (gals/day)**

Use	Unit	Factor	Generation
Existing Industrial/Manufacturing	237,372 sq. ft.	80 gallons/1,000 sq. ft./day	18,989 gals/day
Proposed Project	213,640 sq. ft.	20 gallons/1,000 sq. ft./day	4,254 gals/day
<b>Net Increase/Decrease</b>	-24,662 sq. ft.		-14,735 gals/day

Source: City of Los Angeles CEQA Thresholds Guide

As depicted in the table, the proposed project is anticipated to generate an average of 4,254 gallons of water per day, which is a decrease in consumption of 14,735 gallons of water per day over the existing conditions. This quantity of wastewater will not necessitate the expansion of any waste water treatment capacity. As a result, the potential impacts will be less than significant.

- D. *Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?* • *Less than Significant Impact.*

The Sanitation Districts operate a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. Trash collection for commercial land uses is provided by the other private haulers for disposal into the Commerce Incinerator and into area landfills. Waste may also be transferred to either the Mesquite Regional Landfill in Imperial County or to the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF). The Los Angeles County Sanitation District selected the Mesquite Regional Landfill in Imperial County as the new target destination for the County's waste (as an alternative to the closed Puente Hills landfill). The Mesquite Regional Landfill in Imperial County has a 100-year capacity at 8,000 tons per day.

The Puente Hills Transfer Station and MRF is able to accept 4,440 tons per day of solid waste. The proposed project may generate up to 136 pounds of solid waste per day assuming a generation rate of 10.53 pounds per employee. This amount is not significant and will be accommodated by the aforementioned landfill. As a result, the potential impacts are considered to be less than significant.

*E. Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals? • No Impact.*

The proposed use, 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.

*F. Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? • No Impact.*

The proposed retail development, like all other development in Commerce, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

### **3.19.3 MITIGATION MEASURES**

The analysis of utilities impacts indicated that no significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

## **3.20 WILDFIRE**

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### **3.20.1 THRESHOLDS OF SIGNIFICANCE**

According to the City of Commerce, acting as Lead Agency, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following located in or near State responsibility areas or lands classified as very high fire hazard severity zones:

- Impairment of an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, exacerbation of wildfire risks, and thereby exposure to project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- The requirement of the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or,
- Exposure of people or structures to significant risks, including down slope of downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes.

### **3.20.2 ANALYSIS OF ENVIRONMENTAL IMPACTS**

- A. *Would the project impair an adopted emergency response plan or emergency evacuation plan? • No Impact.*

The proposed project site is located within an urbanized area and no areas containing natural vegetation is located near the project site. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. As a result, no impacts will occur.

- B. *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • Less than Significant Impact.*

The project site and surrounding areas are relatively flat. Furthermore, the project site and the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project area. The proposed project may be exposed to criteria pollutant emissions generated by wildland fires due to the project site's proximity to the Puente Hills and the Montebello Hills. However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, the potential impacts are considered to be less than significant.

- C. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. The project will be constructed in compliance with the 2016 Building Code and the City Fire Department's recommendations and will not exacerbate wildfire risks. In addition, the use of hazardous materials will be limited to those that are commercially available and are used in a household setting. The proposed project, like most development in the City, may be subject to pollutant concentrations from industrial, gas line, or chemical fires due to the project site's proximity to industrial users. As a result, no impacts will occur.

- D. *Would the project expose people or structures to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. The project site and surrounding areas are relatively flat and there are no slopes located nearby. In addition, the project site and surrounding areas are developed and are covered over in pavement and concrete. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no impacts will occur.

### **3.20.3 MITIGATION MEASURES**

The analysis of wildfires impacts indicated that no significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

### **3.21 MANDATORY FINDINGS OF SIGNIFICANCE**

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The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- The approval and subsequent implementation of the proposed project *will not* have the potential to degrade the quality of the environment. As indicated in Section 3.1 through 3.18, the proposed project will not result in any significant unmitigable environmental impacts.
- The approval and subsequent implementation of the proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals. The proposed project will be a long-term permanent investment to accommodate alternative forms of transportation and reduce GHG emissions from mobile sources.
- The approval and subsequent implementation of the proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity. The proposed project is relatively small and the attendant environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.
- The approval and subsequent implementation of the proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly. The proposed project will be a long-term permanent investment to accommodate alternative forms of transportation and reduce GHG emissions from mobile sources. The reduction of approximately 2.5 million VMT will have a positive impact by reducing air quality emissions.

## SECTION 4 CONCLUSIONS

### 4.1 FINDINGS

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The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* have a significant effect on the environment.
- The proposed project *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.
- The proposed project *will not* have environmental effects that will adversely affect humans, either directly or indirectly.
- A Mitigation Reporting and Monitoring Program *will be* required.

### 4.2 MITIGATION MONITORING & REPORTING PROGRAM

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Section 21081(a) of the Public Resources Code states that findings must be adopted by the decision-makers coincidental to the approval of a Mitigated Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the following additional findings may be made:

- A mitigation reporting or monitoring program will be required;
- Site plans and/or building plans, submitted for approval by the responsible monitoring agency, shall include the required standard conditions; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigations adopted as part of the decision-maker's final determination.

### 4.3 MITIGATION MEASURES

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The following mitigation measures will be required to ensure that light trespass and spillover will not adversely affect the housing units:

*Mitigation Measure No. 1 (Light and 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 No. 2 (Light and Glare Impacts).* The signs must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver.

*Mitigation Measure No. 3 (Light and Glare Impacts).* The security and parking area lighting must be designed so as to prevent spillover lighting and/or glare on the adjacent residential properties.

According to the AB-52 consultation, the project site is situated in an area of high archaeological significance. As a result, the following mitigation is required:

*Mitigation Measure No. 4 (Cultural Resources Impacts).* The project Applicant will be required to obtain the services of a qualified Native American Monitor(s) 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 will be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor(s) will complete monitoring logs on a daily basis. The monitor(s) will photo-document the ground disturbing activities. The monitor(s) must also have Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) will be required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k). 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.

The noise analysis indicates that the following mitigation measure will be required:

*Mitigation Measure No. 5 (Noise Impacts).* The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and panels around the engine and vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.

The analysis determined that the proposed project would not result in any significant impact on public except on law enforcement services. The following measure will be required to enhance security:

*Mitigation Measure No. 6 (Law Enforcement).* The final site plan, elevations, building floor plans, and site circulation must be reviewed by the Los Angeles County Sheriff's Department to ensure it conforms to their operational requirements.

*Mitigation Measure No. 7 (Law Enforcement).* The Applicant will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.

The traffic analysis indicates that the following mitigation measure will be required:

*Mitigation Measure No. 8 (Transportation & Circulation Impacts).* A sign prohibiting the execution of left-turns from the site's main driveway must be installed.

## 4.4 MITIGATION MONITORING

The monitoring and reporting on the implementation of these measures, including the period for implementation, monitoring agency, and the monitoring action, are identified in Table 4-1 provided below.

**TABLE 4-1  
MITIGATION-MONITORING PROGRAM**

Measure	Enforcement Agency	Monitoring Phase	Verification
<b>Mitigation Measure No. 1 (Light and Glare Impacts).</b> 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.	Public Works Department and Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
<b>Mitigation Measure No. 2 (Light and Glare Impacts).</b> The signs must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
<b>Mitigation Measure No. 3 (Light and Glare Impacts).</b> The security and parking area lighting must be designed so as to prevent spillover lighting and/or glare on the adjacent residential properties.	Public Works Department and Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:

**TABLE 4-1  
MITIGATION-MONITORING PROGRAM**

Measure	Enforcement Agency	Monitoring Phase	Verification
<b>Mitigation Measure No. 4 (Cultural Resources Impacts).</b> The project Applicant will be required to obtain the services of a qualified Native American Monitor(s) 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 will be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor(s) will complete monitoring logs on a daily basis. The monitor(s) will photo-document the ground disturbing activities. The monitor(s) must also have Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) will be required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k). 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.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the start of any construction related activities.</i> • Mitigation ends when ground disturbance is completed or otherwise noted by the appointed Native American Monitor(s)	Date:  Name & Title:
<b>Mitigation Measure No. 5 (Noise Impacts).</b> The Applicant shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment such as silencers and panels around the engine and vents as a means to reduce machinery noise. A Code Enforcement Officer must check and sign off on all construction equipment prior to the start of construction.	Code Enforcement • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date:  Name & Title:
<b>Mitigation Measure No. 6 (Law Enforcement).</b> The final site plan, elevations, building floor plans, and site circulation must be reviewed by the Los Angeles County Sheriff's Department to ensure it conforms to their operational requirements.	Los Angeles County Sheriff's Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date:  Name & Title:
<b>Mitigation Measure No. 7 (Law Enforcement).</b> The Applicant will be required to prepare a security plan for approval by the Los Angeles County Sheriff's Department.	Los Angeles County Sheriff's Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date:  Name & Title:



**TABLE 4-1**  
**MITIGATION-MONITORING PROGRAM**

Measure	Enforcement Agency	Monitoring Phase	Verification
<b>Mitigation Measure No. 8 (Transportation &amp; Circulation Impacts).</b> A sign prohibiting the execution of left-turns from the site's main driveway must be installed.	Public Works Department and Development Services Department • (Applicant is responsible for implementation)	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date: Name & Title:

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## SECTION 5 REFERENCES

### 5.1 PREPARERS

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Blodgett Baylosis Environmental Planning  
2211 South Hacienda Boulevard, Suite 107  
Hacienda Heights, CA 91745  
(626) 336-0033

Marc Blodgett, Project Manager  
Liesl Sullano, Project Planner

The references consulted as part of this Initial Study's preparation are shown using footnotes. Those references that are available on webpages are identified by their corresponding website addresses.

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## **APPENDICES**

### **APPENDIX A – AIR QUALITY WORKSHEETS**

### **APPENDIX B – TRAFFIC IMPACT ANALYSIS**

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**Trojan Storage**  
South Coast AQMD Air District, Summer

## 1.0 Project Characteristics

### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	212.71	1000sqft	4.88	212,710.00	0

### 1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.008

### 1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - Construction

Demolition -

Construction Off-road Equipment Mitigation -

Mobile Land Use Mitigation -

Energy Mitigation -

Water Mitigation -

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Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	18.00	43.00
tblConstructionPhase	NumDays	230.00	152.00
tblConstructionPhase	NumDays	20.00	23.00
tblConstructionPhase	NumDays	8.00	23.00
tblConstructionPhase	NumDays	18.00	44.00
tblConstructionPhase	NumDays	5.00	20.00
tblConstructionPhase	PhaseEndDate	8/22/2020	8/30/2020
tblConstructionPhase	PhaseEndDate	5/1/2020	2/29/2020
tblConstructionPhase	PhaseEndDate	5/28/2019	5/31/2019
tblConstructionPhase	PhaseEndDate	6/14/2019	7/31/2019
tblConstructionPhase	PhaseEndDate	5/27/2020	4/30/2020
tblConstructionPhase	PhaseEndDate	6/4/2019	6/30/2019
tblConstructionPhase	PhaseStartDate	5/28/2020	5/1/2020
tblConstructionPhase	PhaseStartDate	6/15/2019	8/1/2019
tblConstructionPhase	PhaseStartDate	6/5/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	5/2/2020	3/1/2020
tblConstructionPhase	PhaseStartDate	5/29/2019	6/1/2019
tblGrading	AcresOfGrading	11.50	4.00

## 2.0 Emissions Summary

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**2.1 Overall Construction (Maximum Daily Emission)**

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	4.4232	49.5043	25.3505	0.0774	18.2675	2.3919	20.6594	9.9840	2.2006	12.1846	0.0000	7,970,406 7	7,970,406 7	1.3386	0.0000	8,003,872 3
2020	46.1799	23.1295	21.3615	0.0462	1.2188	1.1428	2.3616	0.3283	1.0747	1.4030	0.0000	4,532,164 2	4,532,164 2	0.7125	0.0000	4,549,975 4
Maximum	46.1799	49.5043	25.3505	0.0774	18.2675	2.3919	20.6594	9.9840	2.2006	12.1846	0.0000	7,970,406 7	7,970,406 7	1.3386	0.0000	8,003,872 3

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	4.4232	49.5043	25.3505	0.0774	7.2470	2.3919	9.6390	3.9263	2.2006	6.1269	0.0000	7,970,406 7	7,970,406 7	1.3386	0.0000	8,003,872 3
2020	46.1799	23.1295	21.3615	0.0462	1.2188	1.1428	2.3616	0.3283	1.0747	1.4030	0.0000	4,532,164 2	4,532,164 2	0.7125	0.0000	4,549,975 4
Maximum	46.1799	49.5043	25.3505	0.0774	7.2470	2.3919	9.6390	3.9263	2.2006	6.1269	0.0000	7,970,406 7	7,970,406 7	1.3386	0.0000	8,003,872 3
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	56.55	0.00	47.87	58.74	0.00	44.58	0.00	0.00	0.00	0.00	0.00	0.00

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**2.2 Overall Operational**

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.7539	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0466
Energy	5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0600e-003	60.0024
Mobile	0.7401	3.8650	10.9403	0.0403	3.2565	0.0312	3.2876	0.8713	0.0291	0.9005		4,098,883 5	4,098,883 5	0.1901		4,103,634 7
Total	5.4995	3.9149	11.0039	0.0406	3.2565	0.0350	3.2915	0.8713	0.0330	0.9043		4,158,577 9	4,158,577 9	0.1913	1.0900e-003	4,163,686 7

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.7539	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0466
Energy	5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0600e-003	60.0024
Mobile	0.7447	3.8963	11.0644	0.0408	3.2985	0.0316	3.3300	0.8826	0.0295	0.9120		4,149,220 7	4,149,220 7	0.1921		4,154,023 9
Total	5.5041	3.9462	11.1279	0.0411	3.2985	0.0354	3.3339	0.8826	0.0333	0.9159		4,208,915 2	4,208,915 2	0.1934	1.0900e-003	4,214,075 9



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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	-0.08	-0.80	-1.13	-1.21	-1.29	-1.08	-1.29	-1.29	-1.06	-1.28	0.00	-1.21	-1.21	-1.09	0.00	-1.21

### 3.0 Construction Detail

#### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	5/1/2019	5/31/2019	5	23	
2	Site Preparation	Site Preparation	6/1/2019	6/30/2019	5	20	
3	Grading	Grading	7/1/2019	7/31/2019	5	23	
4	Building Construction	Building Construction	8/1/2019	2/29/2020	5	152	
5	Paving	Paving	3/1/2020	4/30/2020	5	44	
6	Architectural Coating	Architectural Coating	5/1/2020	6/30/2020	5	43	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 319,065; Non-Residential Outdoor: 106,355; Striped Parking Area: 0 (Architectural Coating – sqft)

#### OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	6.00	81	0.79
Demolition	Excavators	3	6.00	158	0.38
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	6.00	89	0.20
Grading	Excavators	1	6.00	158	0.38
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	2	6.00	80	0.38
Demolition	Rubber Tired Dozers	2	6.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Generator Sets	1	6.00	84	0.74
Grading	Tractors/Loaders/Backhoes	3	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	4	6.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	2	6.00	132	0.36
Site Preparation	Rubber Tired Dozers	3	6.00	247	0.40
Building Construction	Welders	1	6.00	46	0.45

#### Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	1,080.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	69.00	38.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					10.1591	0.0000	10.1591	1.5382	0.0000	1.5382			0.0000			0.0000
Off-Road	3.5134	35.7830	22.0600	0.0388		1.7949	1.7949		1.6697	1.6697	3,816.8994	3,816.8994	1.0618			3,843.4451
Total	3.5134	35.7830	22.0600	0.0388	10.1591	1.7949	11.9540	1.5382	1.6697	3.2078		3,816.8994	3,816.8994	1.0618		3,843.4451

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3.2 Demolition - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.3858	13.6702	2.6165	0.0368	0.8205	0.0507	0.8713	0.2249	0.0495	0.2734	3,978.3590	3,978.3590	0.2713			3,983.1404
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000
Worker	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457	177.1484	177.1484	5.5400e-003			177.2869
Total	0.4593	13.7213	3.2905	0.0386	0.9882	0.0520	1.0402	0.2693	0.0497	0.3191	4,153.5073	4,153.5073	0.2768			4,160.4273

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.9620	0.0000	3.9620	0.5999	0.0000	0.5999			0.0000			0.0000
Off-Road	3.5134	35.7830	22.0600	0.0388		1.7949	1.7949		1.6697	1.6697	0.0000	3,816.8994	3,816.8994	1.0618		3,843.4451
Total	3.5134	35.7830	22.0600	0.0388	3.9620	1.7949	5.7569	0.5999	1.6697	2.2696	0.0000	3,816.8994	3,816.8994	1.0618		3,843.4451

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3.2 Demolition - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.3858	13.6702	2.6165	0.0368	0.8205	0.0507	0.8713	0.2249	0.0485	0.2734		3,976.359 0	3,976.359 0	0.2713		3,983.140 4
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0735	0.0511	0.6740	1.7600e-003	0.1977	1.3000e-003	0.1990	0.0445	1.2000e-003	0.0457		177.1494	177.1494	5.5400e-003		177.2869
Total	0.4593	13.7213	3.2905	0.0386	0.9882	0.0526	1.0402	0.2693	0.0497	0.3191		4,153.507 3	4,153.507 3	0.2768		4,160.427 3

3.3 Site Preparation - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	4.3350	45.5727	22.0630	0.0380		2.3904	2.3904		2.1991	2.1991		3,766.452 9	3,766.452 9	1.1917		3,796.244 5
Total	4.3350	45.5727	22.0630	0.0380	18.0663	2.3904	20.4566	9.9307	2.1991	12.1298		3,766.452 9	3,766.452 9	1.1917		3,796.244 5

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3.3 Site Preparation - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0458	0.0000	7.0458	3.8730	0.0000	3.8730			0.0000			0.0000
Off-Road	4.3350	45.5727	22.0630	0.0380		2.3904	2.3904		2.1991	2.1991		3,766.452 9	3,766.452 9	1.1917		3,796.244 5
Total	4.3350	45.5727	22.0630	0.0380	7.0458	2.3904	9.4362	3.8730	2.1991	6.0721		3,766.452 9	3,766.452 9	1.1917		3,796.244 5

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3.3 Site Preparation - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

3.4 Grading - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2065	0.0000	6.2065	3.3301	0.0000	3.3301			0.0000			0.0000
Off-Road	2.5805	28.3480	16.2934	0.0297		1.3974	1.3974		1.2856	1.2856		2,936.8068	2,936.8068	0.9292		2,960.0361
Total	2.5805	28.3480	16.2934	0.0297	6.2065	1.3974	7.6039	3.3301	1.2856	4.6157		2,936.8068	2,936.8068	0.9292		2,960.0361

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3.4 Grading - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2869
Total	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2869

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.4205	0.0000	2.4205	1.2988	0.0000	1.2988			0.0000			0.0000
Off-Road	2.5805	28.3480	16.2934	0.0297		1.3974	1.3974		1.2856	1.2856	0.0000	2,936.8068	2,936.8068	0.9292		2,960.0361
Total	2.5805	28.3480	16.2934	0.0297	2.4205	1.3974	3.8179	1.2988	1.2856	2.5843	0.0000	2,936.8068	2,936.8068	0.9292		2,960.0361

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3.4 Grading - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2869
Total	0.0735	0.0511	0.6740	1.7800e-003	0.1677	1.3000e-003	0.1690	0.0445	1.2000e-003	0.0457		177.1484	177.1484	5.5400e-003		177.2869

3.5 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127		2,591,580.2	2,591,580.2	0.6313		2,607,363.5
Total	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127		2,591,580.2	2,591,580.2	0.6313		2,607,363.5

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3.5 Building Construction - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1349	4.0048	0.9681	0.0700e-003	0.2240	0.0265	0.2505	0.0645	0.0254	0.0899		966.7690	966.7690	0.0640		968.3682
Worker	0.4359	0.3033	3.9991	0.0106	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		1,051,080.2	1,051,080.2	0.0329		1,051,902.1
Total	0.5708	4.3081	4.9672	0.0196	1.2188	0.0343	1.2531	0.3283	0.0325	0.3608		2,017,849.2	2,017,849.2	0.0968		2,020,270.2

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127		2,591,580.2	2,591,580.2	0.6313		2,607,363.5
Total	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127		2,591,580.2	2,591,580.2	0.6313		2,607,363.5

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**3.5 Building Construction - 2019**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1349	4.0048	0.9691	9.0700e-003	0.2240	0.0295	0.2505	0.0645	0.0254	0.0899		966.7690	966.7690	0.0640		968.3693
Worker	0.4359	0.3033	3.9991	0.0106	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		1,051.0802	1,051.0802	0.0329		1,051.9621
Total	0.5708	4.3081	4.9672	0.0196	1.2188	0.0343	1.2331	0.3283	0.0325	0.3608		2,017.8492	2,017.8492	0.0968		2,020.2702

**3.5 Building Construction - 2020**

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1198	19.1860	16.8485	0.0269		1.1171	1.1171		1.0503	1.0503		2,553.0631	2,553.0631	0.6229		2,568.6345
Total	2.1198	19.1860	16.8485	0.0269		1.1171	1.1171		1.0503	1.0503		2,553.0631	2,553.0631	0.6229		2,568.6345

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**3.5 Building Construction - 2020**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1149	3.6727	0.8748	9.0100e-003	0.2240	0.0182	0.2422	0.0645	0.0174	0.0819		960.5696	960.5696	0.0603		962.0773
Worker	0.4027	0.2707	3.6385	0.0102	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		1,018.5315	1,018.5315	0.0293		1,019.2636
Total	0.5176	3.9434	4.5130	0.0192	1.2188	0.0258	1.2446	0.3283	0.0244	0.3527		1,979.1011	1,979.1011	0.0896		1,981.3409

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1198	19.1860	16.8485	0.0269		1.1171	1.1171		1.0503	1.0503	0.0000	2,553.0631	2,553.0631	0.6229		2,568.6345
Total	2.1198	19.1860	16.8485	0.0269		1.1171	1.1171		1.0503	1.0503	0.0000	2,553.0631	2,553.0631	0.6229		2,568.6345



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3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1149	3.6727	0.8748	9.0100e-003	0.2240	0.0182	0.2422	0.0645	0.0174	0.0819		960.5696	960.5696	0.0603		962.0773
Worker	0.4027	0.2707	3.6385	0.0102	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		1,018.5315	1,018.5315	0.0293		1,019.2636
Total	0.5176	3.9434	4.5130	0.0192	1.2188	0.0258	1.2446	0.3283	0.0244	0.3527		1,979.1011	1,979.1011	0.0896		1,981.3409

3.6 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1837	11.8015	12.2823	0.0189		0.6509	0.6509		0.6005	0.6005		1,804.7070	1,804.7070	0.5670		1,818.8830
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.1837	11.8015	12.2823	0.0189		0.6509	0.6509		0.6005	0.6005		1,804.7070	1,804.7070	0.5670		1,818.8830

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3.6 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0905	0.0608	0.8176	2.3000e-003	0.2236	1.7000e-003	0.2253	0.0593	1.5600e-003	0.0609		228.8835	228.8835	6.5800e-003		229.0480
Total	0.0905	0.0608	0.8176	2.3000e-003	0.2236	1.7000e-003	0.2253	0.0593	1.5600e-003	0.0609		228.8835	228.8835	6.5800e-003		229.0480

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1837	11.8015	12.2823	0.0189		0.6509	0.6509		0.6005	0.6005		1,804.7070	1,804.7070	0.5670		1,818.8830
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.1837	11.8015	12.2823	0.0189		0.6509	0.6509		0.6005	0.6005		1,804.7070	1,804.7070	0.5670		1,818.8830

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3.6 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0905	0.0608	0.8176	2.3000e-003	0.2236	1.7000e-003	0.2253	0.0593	1.5600e-003	0.0609		228.8835	228.8835	6.5800e-003		229.0480
Total	0.0905	0.0608	0.8176	2.3000e-003	0.2236	1.7000e-003	0.2253	0.0593	1.5600e-003	0.0609		228.8835	228.8835	6.5800e-003		229.0480

3.7 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	45.8563					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	46.0985	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

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3.7 Architectural Coating - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432
Total	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	45.8563					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	46.0985	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928



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### 3.7 Architectural Coating - 2020

#### Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432
Total	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432

### 4.0 Operational Detail - Mobile

#### 4.1 Mitigation Measures Mobile

Increase Diversity

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7447	3.8963	11.0944	0.0408	3.2985	0.0316	3.3300	0.8826	0.0295	0.9120		4,149,220.7	4,149,220.7	0.1921		4,154,023.9
Unmitigated	0.7401	3.8650	10.9403	0.0403	3.2565	0.0312	3.2876	0.8713	0.0291	0.9005		4,096,883.5	4,096,883.5	0.1901		4,103,634.7

#### 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Unrefrigerated Warehouse-No Rail	357.35	357.35	357.35	1,531,513	1,551,261
Total	357.35	357.35	357.35	1,531,513	1,551,261

#### 4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Unrefrigerated Warehouse-No Rail	16.60	6.40	6.90	59.00	0.00	41.00	92	5	3

#### 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Unrefrigerated Warehouse-No Rail	0.548858	0.043235	0.200708	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000625

### 5.0 Energy Detail

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Historical Energy Use: N

### 5.1 Mitigation Measures Energy

Install High Efficiency Lighting

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0900e-003	60.0024
NaturalGas Unmitigated	5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0900e-003	60.0024

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### 5.2 Energy by Land Use - NaturalGas

#### Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unrefrigerated Warehouse-No Rail	507.007	5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0900e-003	60.0024
Total		5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0900e-003	60.0024

#### Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unrefrigerated Warehouse-No Rail	0.507007	5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0900e-003	60.0024
Total		5.4700e-003	0.0497	0.0418	3.0000e-004		3.7800e-003	3.7800e-003		3.7800e-003	3.7800e-003		59.6479	59.6479	1.1400e-003	1.0900e-003	60.0024

### 6.0 Area Detail

#### 6.1 Mitigation Measures Area

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.7539	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0496
Unmitigated	4.7539	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0496

## 6.2 Area by SubCategory

### Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.5402					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.2117					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.0400e-003	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0496
Total	4.7539	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0496

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## 6.2 Area by SubCategory

### Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.5402					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.2117					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.0400e-003	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0496
Total	4.7539	2.0000e-004	0.0218	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0466	0.0466	1.2000e-004		0.0496

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

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## 10.0 Stationary Equipment

---

### Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

### Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

### User Defined Equipment

Equipment Type	Number
----------------	--------

## 11.0 Vegetation

---

[illegible]

Blodgett Baylosis Environmental Planning  
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◆ ◆

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January 2019  
CCE190-01/PBL

**TRAFFIC IMPACT STUDY**  
**TROJAN SELF-STORAGE DEVELOPMENT**  
**6210 GARFIELD AVENUE**  
**COMMERCE, CALIFORNIA**

**PREPARER'S CERTIFICATE**

This is to certify that the above titled traffic study has been prepared under the supervision of Patrick B. Lang, P.E., a Professional Traffic Engineer, registered in the State of California.

\_\_\_\_\_  
Patrick B. Lang, P.E.  
Registration #: TR 875

\_\_\_\_\_  
Date

\_\_\_\_\_  
Professional Engineer's Stamp

# **TRAFFIC IMPACT STUDY**

## **TROJAN SELF-STORE DEVELOPMENT**

### **6210 GARFIELD AVENUE**

#### **COMMERCE, CALIFORNIA**

#### **EXECUTIVE SUMMARY**

The purpose of this traffic impact analysis is to evaluate the impacts on traffic circulation system with the proposed Trojan Self-Storage Development consisting of approximately 212,710 square feet of self-storage including 3,310 square feet of a single-family residence and office. Since the single-family residence and the office are assumed for ancillary use, the trip generation and its required parking spaces are based on the warehouse rate. The development will be located at 6210 Garfield Avenue within the City of Commerce, California.

Study objectives include: 1) documentation of existing 2019 traffic conditions in the vicinity of the site, 2) determination of Project Opening Year (2020) traffic conditions and level of service (LOS) without and with the project, 3) determination of project related impacts to the circulation system and 4) identification of mitigation measures to reduce significant impacts, if any, to a level of insignificance. The study included evaluation of the following five (5) key intersections in the general vicinity of the site.

- Garfield Avenue and Randolph Street (Signalized)
- Garfield Avenue and Gage Avenue (Signalized)
- Garfield Avenue and Slauson Avenue (Signalized)
- Garfield Avenue and Bandini Boulevard (Signalized)
- Garfield Avenue and Telegraph Road (Signalized)

The Trojan Self-Storage Development is estimated to generate a net total of approximately 370 new two-way trips per day, with 26 trips during the AM peak hour (15 inbound and 11 outbound), and 42 trips during the PM peak hour (20 inbound and 22 outbound).

In summary, based on the results of this traffic impact analysis, the proposed Trojan Self-Storage Development will not have any significant adverse impacts on level of service (LOS) at any of the key five (5) intersections analyzed within the surrounding roadway system.

A review of Congestion Management Program (CMP) guidelines was also conducted. Since the project will not add 50 or more trips to any CMP arterial monitoring intersection during either the AM or PM weekday peak hours, no CMP arterial monitoring intersection was analyzed in this TIA. The project will not add 150 or more trips on the freeway mainline traffic volume in any direction during the AM or the PM weekday peak hours. Therefore, no freeway monitoring location was required to be analyzed per CMP guidelines.

The project's parking demand and the number of parking spaces provided for parking have also been analyzed using the ITE Trip Generation (4<sup>th</sup> Edition) parking code, and found to adequately meet the requirements for parking.



# **TRAFFIC IMPACT STUDY**

## **TROJAN SELF-STORAGE DEVELOPMENT**

### **6210 GARFIELD AVENUE**

#### **COMMERCE, CALIFORNIA**

## **INTRODUCTION**

The purpose of this traffic impact analysis is to evaluate the impacts on traffic circulation system due to the proposed Trojan Self-Storage Development at 6210 Garfield Avenue, Commerce, California. The project site is located at the southeast corner of the Garfield Avenue and Randolph Street intersection.

The following are the key objectives identified for this study:

- Documentation of existing traffic conditions in the vicinity of the proposed development
- Determination of project opening year (2020) traffic conditions and level of service (LOS) without, and with the proposed project
- Determination of adequacy of on-site parking and circulation
- Determination of project related impacts and mitigation measures if necessary

The report provides data regarding existing operational characteristics of traffic in the general vicinity of the project, as well as an analysis of the proposed project's impacts to these existing and anticipated traffic conditions. The report identifies and quantifies the impact (if any) at the five (5) key intersections and addresses the most appropriate and reasonable mitigation strategies at any impacted intersections, which are identified to be operating at a deficient level of service.

This report investigates existing and anticipated future opening year (2020) traffic operating conditions. The adequacy of parking spaces to be provided is also assessed.

## **REPORT METHODOLOGY**

### **STUDY APPROACH**

This report approaches the task of identifying and quantifying the anticipated impacts to the circulation system with a structured, "building block" methodology. The first step is

to inventory and quantify existing conditions. Upon this foundation of fact, a travel forecast model is structured for the entire project area and calibrated to produce reliable output, verifiable with the existing data. With the project traffic calculated and distributed onto the study area, at the anticipated opening year of the project in 2020, the travel forecast model is utilized to assess the project traffic impacts at that time. The model utilizes a growth factor for traffic based upon regional guidelines, as well as the traffic anticipated to be introduced from the proposed project to produce the travel forecast and level-of-service data for the future target year.

The trip generation estimate is based on the 10<sup>th</sup> edition of Institute of Transportation Engineers (ITE)'s "Trip Generation" Handbook. Research has been conducted in order to identify and characterize the most probable trip distribution patterns within the study area.

Project impacts are identified for the future year 2020 conditions. At those intersections operating deficiently (e.g., at a level worse than LOS D) and significantly impacted by the proposed project, a mitigation measure is identified and applied, and a before-and-after mitigation analysis conducted.

#### **LEVEL OF SERVICE CRITERIA**

Roadway operations and the relationship between capacity and traffic volumes are generally expressed in terms of levels of service (LOS). Levels of service are defined as LOS A through F. These levels recognize that, while an absolute limit exists as to the amount of traffic traveling through a given intersection (the absolute capacity), the conditions that motorists experience deteriorate rapidly as traffic approaches the absolute capacity. Under such conditions, congestion is experienced. There is generally instability in the traffic flow, which means that relatively small incidents (e.g., momentary engine stall) can cause considerable fluctuations in speeds and delays. This near-capacity situation is labeled LOS E. Beyond LOS E, capacity is exceeded, and arriving traffic will exceed the ability of the intersection to accommodate it. An upstream queue will form and continue to expand in length until the demand volume reduces.

A complete description of the meaning of level of service can be found in the Highway Research Board's Special Report 209 titled *Highway Capacity Manual*. The manual establishes the definitions for levels of service A through F. Brief descriptions of the six levels of service, as extracted from the manual, are listed in Table 1. The thresholds of level of service for signalized and unsignalized intersections are shown in Table 2

**TABLE 1  
 LEVEL OF SERVICE DEFINITIONS**

LOS	Description
A	No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally, drivers have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from restriction downstream. Speeds are reduced substantially and stoppages may occur for short or long periods of time due to congestion. In the extreme case, both speed and volume can drop to zero.

**TABLE 2**  
**LEVEL OF SERVICE CRITERIA**

Level of Service	Signalized Intersection Volume to Capacity (V/C) Ratio
A	0.00 – 0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	≥ 1.01

According to the City's General Plan (January 2008), LOS "D" is a target LOS standard, and LOS "E" is as a threshold standard.

The above standards may require, but are not intended to mandate, roadway and/or intersection widening. They are a policy goal and shall be used to monitor traffic conditions to assess the impacts of new development. Since LOS standards apply only to vehicles and do not account for walkability or other modes, they shall not be the sole criteria for judging transportation system performance.

For the signalized study intersections, the Intersection Capacity Utilization (ICU) method has been utilized to determine intersection levels of service. For all signalized intersections, a capacity volume of 1,600 vehicles per hour per lane (2,880 vehicles per hour per dual left turn lanes) was used. Levels of service are presented for the entire intersection, consistent with the local and regional agency policies.

Feasible mitigation measures were identified to a level of insignificance to mitigate the project and cumulative projects' significant impacts. Significant impacts by project were determined based on the following:

THRESHOLD OF SIGNIFICANT IMPACT	
<u>Pre-project LOS V/C</u>	<u>Project V/C Ratio Increase</u>
C = 0.71 to 0.80	0.04 or more
D= 0.81 to 0.90	0.02 or more
E/F= 0.91 or more	0.01 or more

While the level of service concept and analysis methodology provides an indication of the performance of the entire intersection, the single letter grade A through F cannot describe specific operational deficiencies at intersections. Progression, queue formation, and left-turn storage are examples of the operational issues that affect the performance of an intersection, but do not factor into the strict calculation of level of service.

## EXISTING ROADWAY SYSTEM AND TRAFFIC VOLUMES

### EXISTING CIRCULATION NETWORK

In order to assess future operating conditions both with and without the proposed project, existing traffic conditions within the study area were evaluated. Figure 1, Vicinity Map, illustrates the existing circulation network within the study area as well as the location of the proposed project. Figure 2 shows an aerial view of the circulation network. The project would provide vehicular access to the parking and truck loading via a driveway located on the south side of Triggs Street.

The following paragraphs provide a brief description of the existing roadways which comprise the circulation network of the study area, providing the majority of both regional and local access to the project.

**GARFIELD AVENUE.** Garfield Avenue is a north-south major arterial roadway with two (2) travel lanes in each direction. The street is approximately 78 feet wide and its posted speed limit is 40 miles per hour. Directional travels are separated by either median island or two-way left-turn lane. Parking is restricted along both curb lines.

**TELEGRAPH ROAD.** Telegraph Road is a northwest-southeast major arterial street and striped with two (2) travel lanes in each direction. The street is 84 feet wide and posted with a speed limit of 45 miles per hour. Directional travels are separated by a yellow line lane along the center of the roadway. The intersection with Garfield Avenue is signalized. Parking is prohibited along both sides of the street.



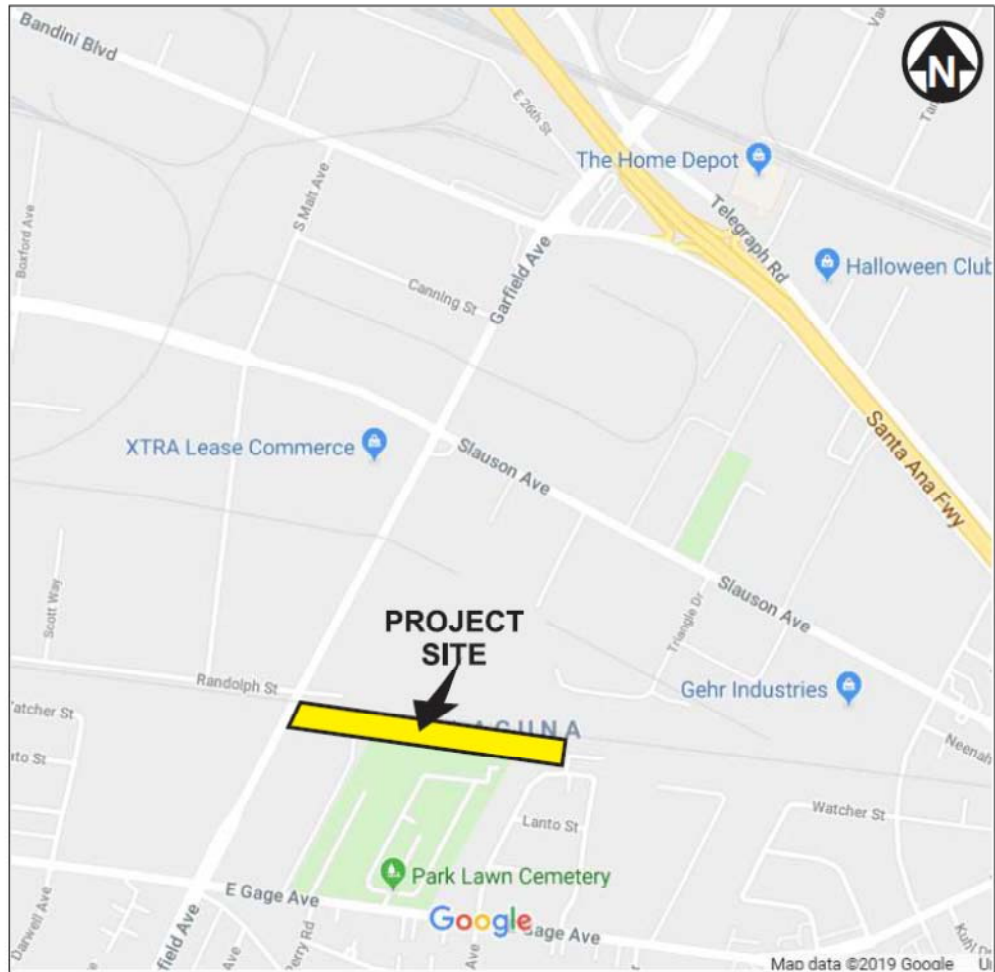
BANDINI BOULEVARD. Bandini Boulevard is an east-west major arterial roadway and striped with two (2) travel lanes in each direction. The street is 64 feet wide and has a posted speed limit of 40 miles per hour. Directional travels are separated by a yellow line lane along the center of the street. The intersection with Garfield Avenue is signalized. Parking is prohibited along both sides of the street.

SLAUSON AVENUE. Slauson Avenue is an east-west major arterial street with two (2) travel lanes in each direction. The roadway is 76 - 82 feet wide and posed with 45 miles per hour speed limit. Directional travels are separated by two-lane left-turn lane along the roadway. The intersection at Garfield Avenue is signalized. Parking is partially restricted along both sides of the street.

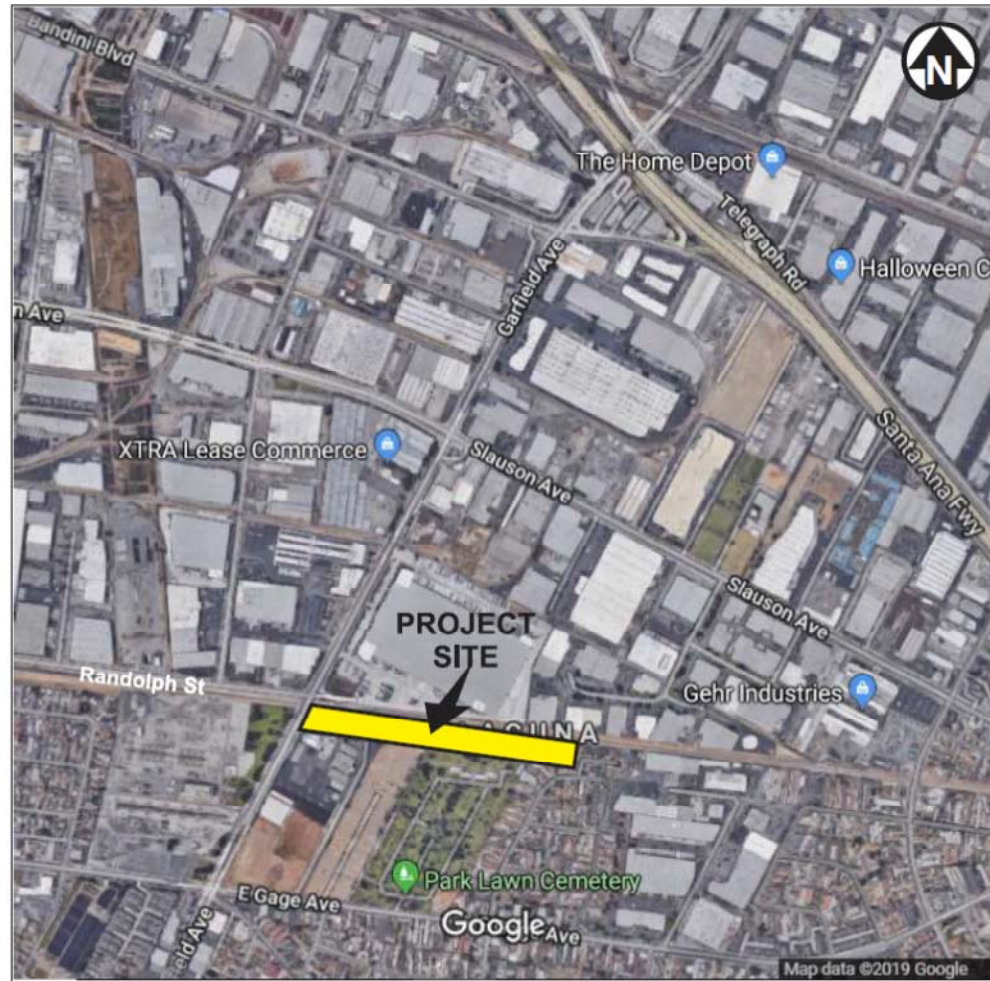
RANDOLPH STREET. Randolph Street is an east-west collector street and striped with two (2) travel lanes in each direction. The roadway is 60 feet wide and posed with 45 miles per hour speed limit. Directional travels are separated by a yellow line lane along the center of the street. The intersection with Garfield Avenue is signalized. Parking is permitted on the north while prohibited on the south side of the street.

GAGE AVENUE. Gage Avenue is an east-west secondary arterial street and striped with two (2) travel lanes in each direction. The roadway is 64 feet wide. The posted speed limit is 35 miles per hour. Directional travels are separated by either raised median or two-lane left-turn lane along the center of the street. The intersection at Garfield Avenue is signalized. Parking is mostly prohibited on both sides of the street.

**FIGURE 1  
VICINITY MAP**



**FIGURE 2**  
**AERIAL VIEW OF CIRCULAR NETWORK**





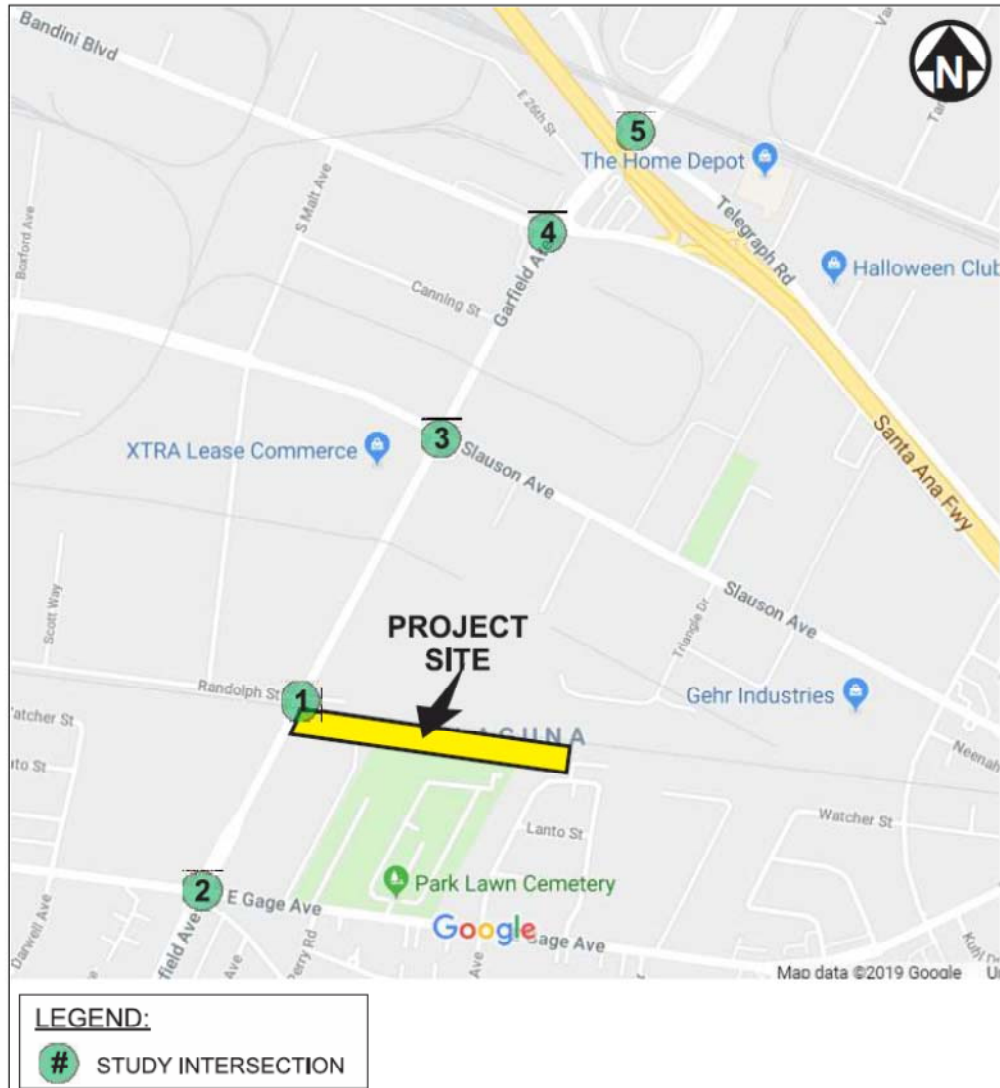
## EXISTING TRAFFIC VOLUMES

For the purpose of evaluating existing operating conditions as well as future operating conditions with and without the proposed project, the study area was carefully selected in accordance with local traffic study guidelines and consultation with City staff. Manual turning movement counts for the selected intersections were collected during the morning and evening peak periods during the month of January 2019. The peak hours for the counts were 7:00 to 9:00 AM and 4:00 to 6:00 PM. It was determined that the following five (5) key intersections would be analyzed in the study:

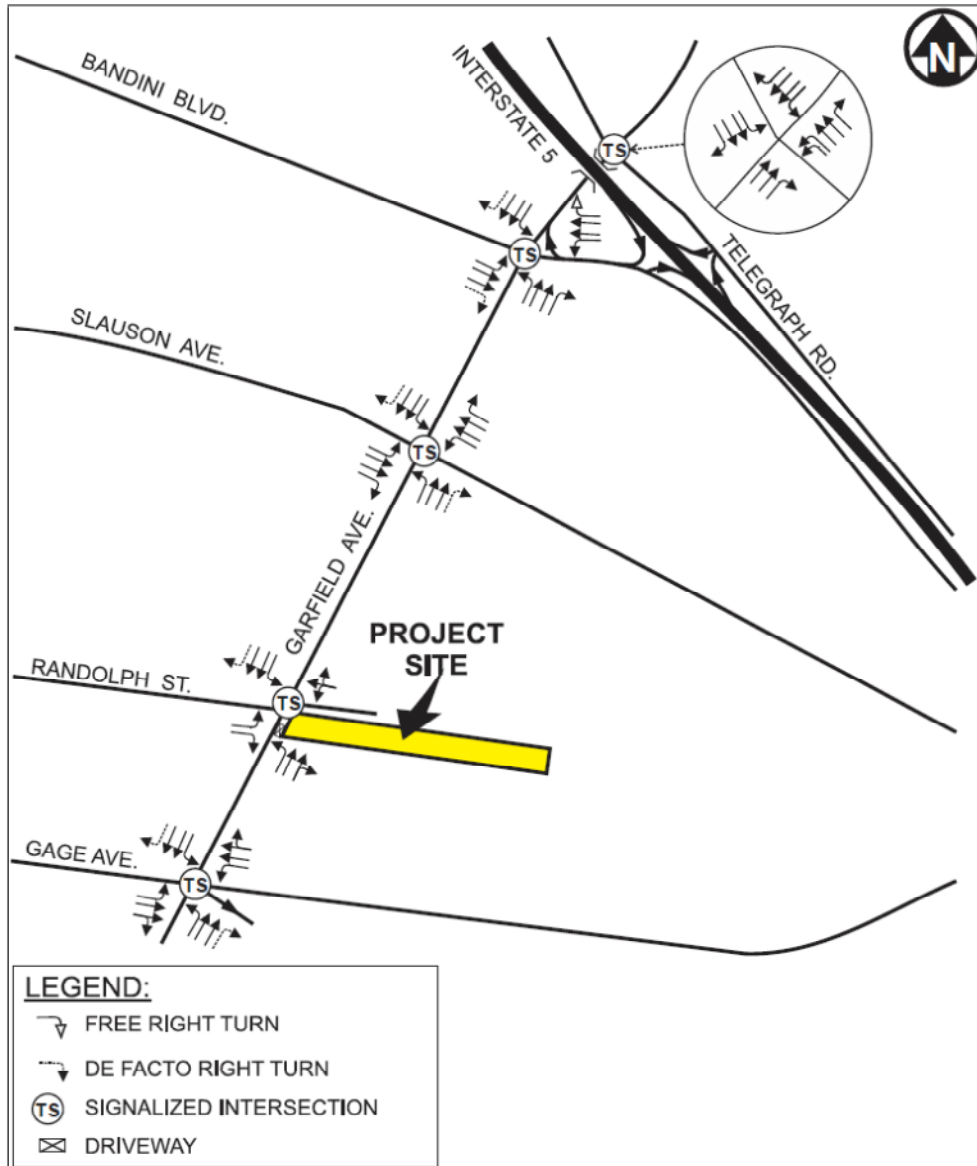
- Garfield Avenue and Randolph Street (Signalized)
- Garfield Avenue and Gage Avenue (Signalized)
- Garfield Avenue and Slauson Avenue (Signalized)
- Garfield Avenue and Bandini Boulevard (Signalized)
- Garfield Avenue and Telegraph Road (Signalized)

The locations of study intersections are shown in Figure 3. Existing lane configurations at the study intersections are shown in Figure 4. Existing turning movement counts for AM and PM peak hour conditions are shown in Figure 5. Detailed turning movement counts are included in the Appendix-A of this report.

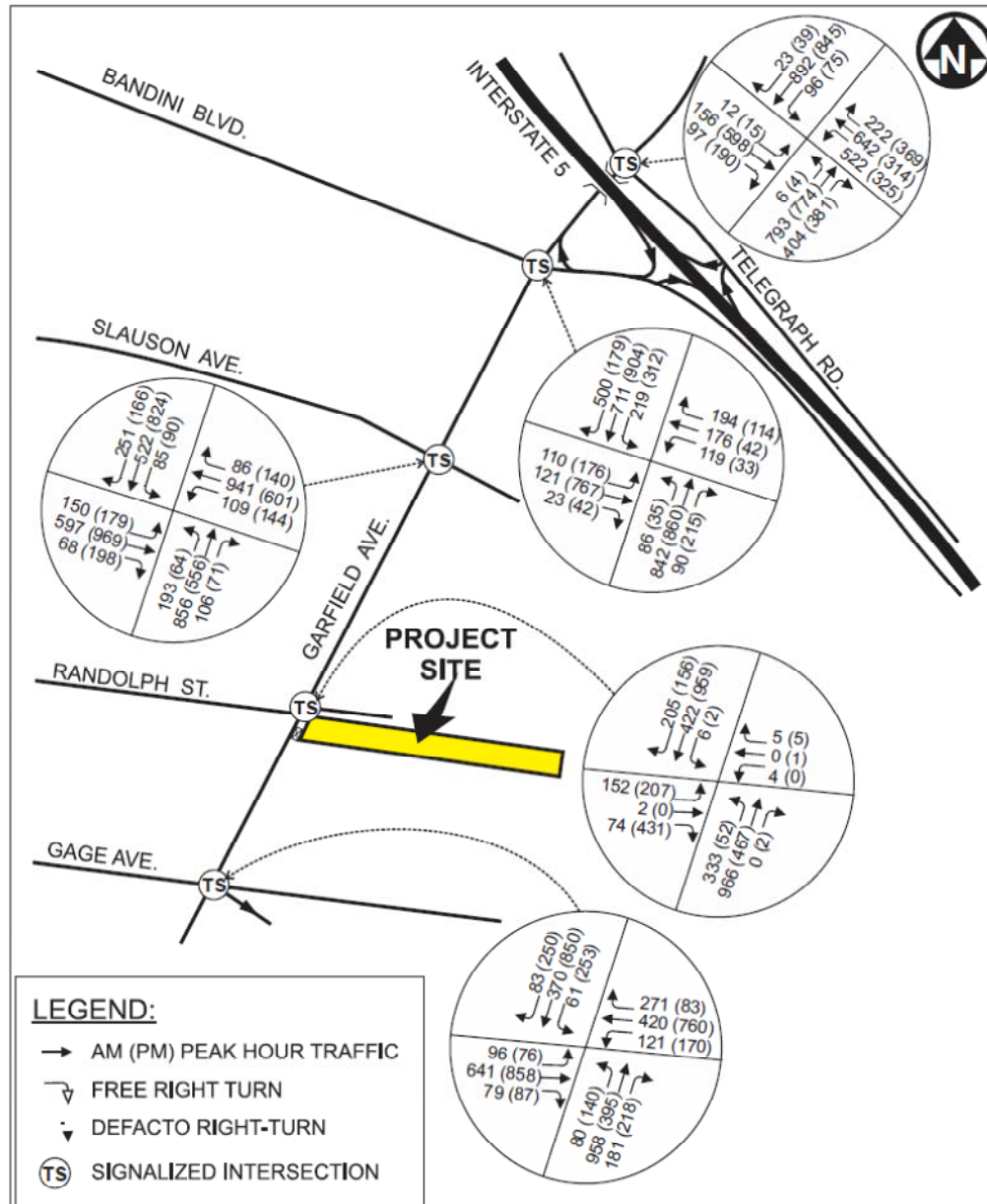
**FIGURE 3**  
**LOCATION OF STUDY INTERSECTION**



**FIGURE 4**  
**LANE CONFIGURATION OF STUDY INTERSECTION**



**FIGURE 5**  
**EXISTING PEAK HOUR TURNING MOVEMENT COUNTS**



## EXISTING (2019) TRAFFIC CONDITIONS

Year 2019 existing traffic conditions were evaluated using the Intersection Capacity Utilization (ICU) method for signalized intersections and Highway Capacity Manual (HCM) method for unsignalized intersections. Table 3 presents the existing condition intersection level of service analysis summary. Detailed calculations relating to the study intersections are included in the Technical Appendix of this report.

As shown in the Table 3 the study intersections are currently operating at a Level of Service (LOS) D or better during both the AM and PM peak hours at all the five (5) key intersections.

**TABLE 3  
EXISTING (2019) LEVEL OF SERVICE SUMMARY**

#	Intersection	Control Type	Peak Hour	2019 Existing Conditions	
				LOS	V/C Ratio
1	Garfield Ave & Randolph St	Signal	AM	A	0.541
			PM	B	0.669
2	Garfield Ave & Gage Ave	Signal	AM	C	0.738
			PM	D	0.855
3	Garfield Ave & Slauson Ave	Signal	AM	D	0.808
			PM	C	0.790
4	Garfield Ave & Bandini Blvd	Signal	AM	B	0.624
			PM	D	0.824
5	Garfield Ave & Telegraph Rd	Signal	AM	B	0.652
			PM	B	0.690

## OPENING YEAR (2019) PRE-PROJECT CONDITIONS

A 1.0 percent per year ambient traffic growth rate was applied to existing traffic volumes to create a 2019 base condition (i.e., a factor of 1.01 was applied to 2019 volumes to obtain 2020 base traffic volumes). This ambient traffic growth rate accounts for the population growth and any other unknown traffic generators within the study area.

There are three (3) cumulative projects in the vicinity of this proposed project. Future 2020 cumulative traffic conditions were evaluated as shown in Table 4.

**TABLE 4**  
**CUMULATIVE PLANNED PROJECT TRIP GENERATION**

Land Use	Daily Trips	Average Traffic Volume					
		AM Peak Hour			PM Peak Hour		
		IN	OUT	Total	IN	OUT	Total
Related Project 1: Paris Baguette @ 6100 Malt Ave - 16,300 sf Bakery	615	9	6	15	30	32	62
Related Project 2: Warehouse Building @ 7140 Bandini Blvd - 185,000 sf Warehousing	322	24	7	31	9	26	35
Passenger Car Equivalent (PCE) Trips:	370	28	8	36	10	30	40
Related Project 3: Vehicle Repair @ 7500 Wellman St 2,000 sf - Auto Care Center	-	3	2	5	3	3	6
Total Trips in PCE	-	40	16	56	43	65	108

This pre-project traffic condition with the above cumulative projects was evaluated using the Intersection Capacity Utilization (ICU) method for signalized intersections. Detailed calculations for the study intersections are included in the Technical Appendix of this report. The LOS and V/C ratios for the study intersections under 2020 pre-project conditions with cumulative projects (without project) are shown in Table 5.



**TABLE 5  
FUTURE (2020) PRE-PROJECT WITH CUMULATIVE PROJECTS LEVEL OF SERVICE  
SUMMARY**

#	Intersection	Control Type	Peak Hour	2020 Pre-Project Future Conditions	
				LOS	V/C Ratio
1	Garfield Ave & Randolph St	Signal	AM	A	0.547
			PM	B	0.682
2	Garfield Ave & Gage Ave	Signal	AM	C	0.747
			PM	D	0.867
3	Garfield Ave & Slauson Ave	Signal	AM	D	0.820
			PM	C	0.803
4	Garfield Ave & Bandini Blvd	Signal	AM	B	0.634
			PM	D	0.841
5	Garfield Ave & Telegraph Rd	Signal	AM	B	0.658
			PM	B	0.701

As shown in Table 5, all the study intersections are expected to be operating at LOS D or better during both the AM and PM peak hours.

## PROPOSED PROJECT

### PROJECT DESCRIPTION

The proposed self-storage project is to construct three (3) buildings for a total of 212,710 square feet including 3,310 square feet of residence and office spaces. Figure 6 shows the proposed site plan for the project.

### PROJECT TRIP GENERATION

In order to accurately assess future traffic conditions with the proposed project, trip generation estimates were developed for the project. Trip generation rates are based on nationally recognized recommendations contained in "Trip Generation" handbook, 10th edition, published by the Institute of Transportation Engineers (ITE). Table 6 show a summary of trip generation estimates for the project.

**TABLE 6  
TRIP GENERATION FOR A MINI WAREHOUSE**

ITE Code/ Land Use	Size & Unit	Trip Generation Rate*								Average Traffic Volume					
		Daily Total	AM Peak Hour			PM Peak Hour			Daily Total	AM Peak Hour			PM Peak Hour		
			Total	%IN	%OUT	Total	%IN	%OUT		IN	OUT	Total	IN	OUT	Total
Total Vehicle Trip Generation															
M. W/Hse (151)	212.71 KSF	1.51	0.1	60%	40%	0.17	47%	53%	322	13	9	21	17	19	36
Vehicle Mix** and Passenger Car Equivalent (PCE) Trips															
Vehicle Mix	Trip %	Vehicle Trips							PCE Trips						
		Daily Total	AM Peak			PM Peak			Daily Total	AM Peak			PM Peak		
			IN	OUT	TOTAL	IN	OUT	TOTAL		IN	OUT	TOTAL	IN	OUT	TOTAL
Car (PCE=1.0)	85%	274	11	7	18	14	16	30	274	11	7	18	14	16	30
2+ Axle Truck (PCE=2.0)	15%	48	2	2	4	3	3	6	96	4	4	8	6	6	12
TOTAL TRIPS IN PCE***:									370	15	11	26	20	22	42
Note: Note: All trip rates are average rates per Institute of Transportation Engineers (ITE)'s publication manual "Trip Generation", 10th Edition, 2017. * Trip rates for Warehouse (ITE Code 151) from Institute of Transportation Engineers (ITE), "Trip Generation" manual, 10th Edition, 2017 ** Vehicle mix percentages for Heavy Warehouse (ITE Code 150) from the City of Fontana, "Truck Trip Generation Study", August 2003 *** The single-family residence and the office are assumed for ancillary use, and calculated as Warehouse (ITE Code 151).															

## TRIP DISTRIBUTION AND ASSIGNMENT

Arrival and departure distribution patterns for project-generated traffic were estimated based upon a review of circulation patterns within the study area network and regional traffic generation and attraction characteristics.

Figure 7 depicts the regional trip distribution percentages to and from the site. Figure 8 presents the project traffic volume.



FIGURE 6  
SITE PLAN

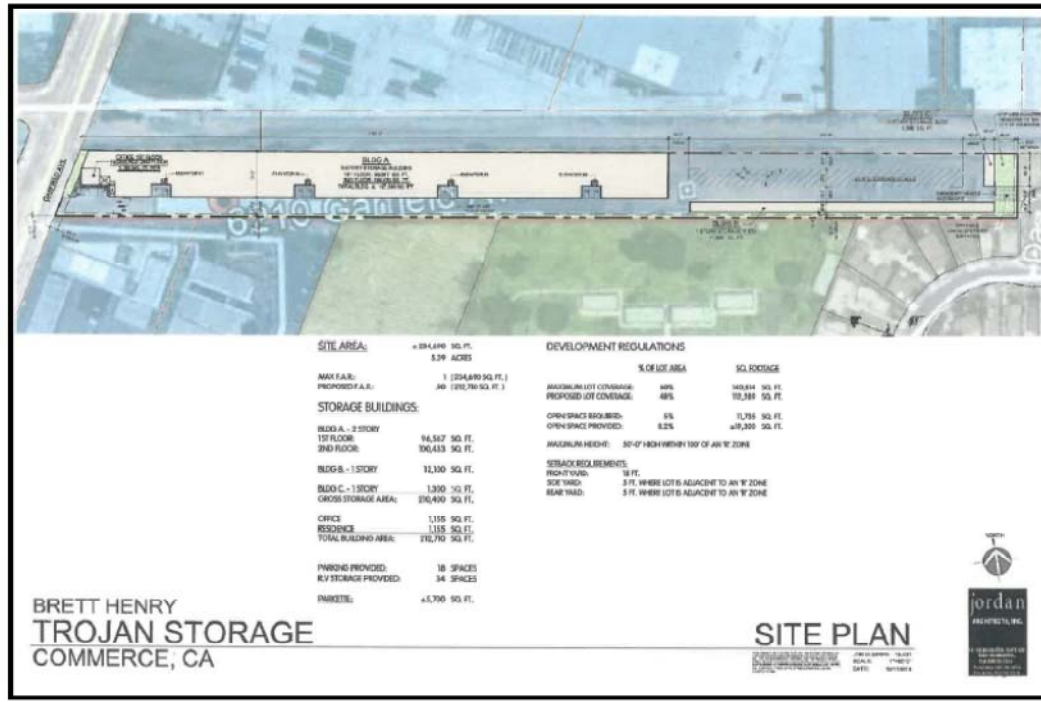
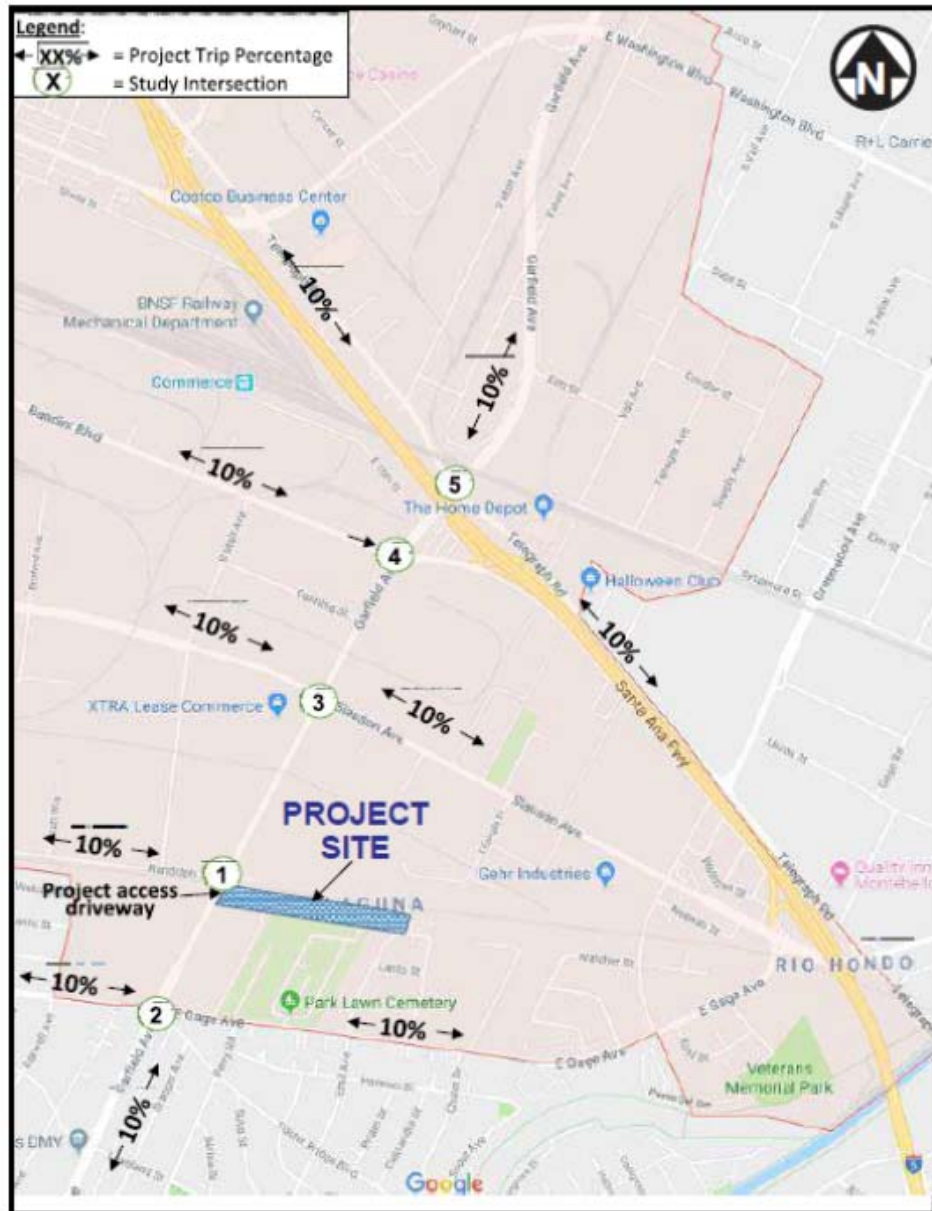
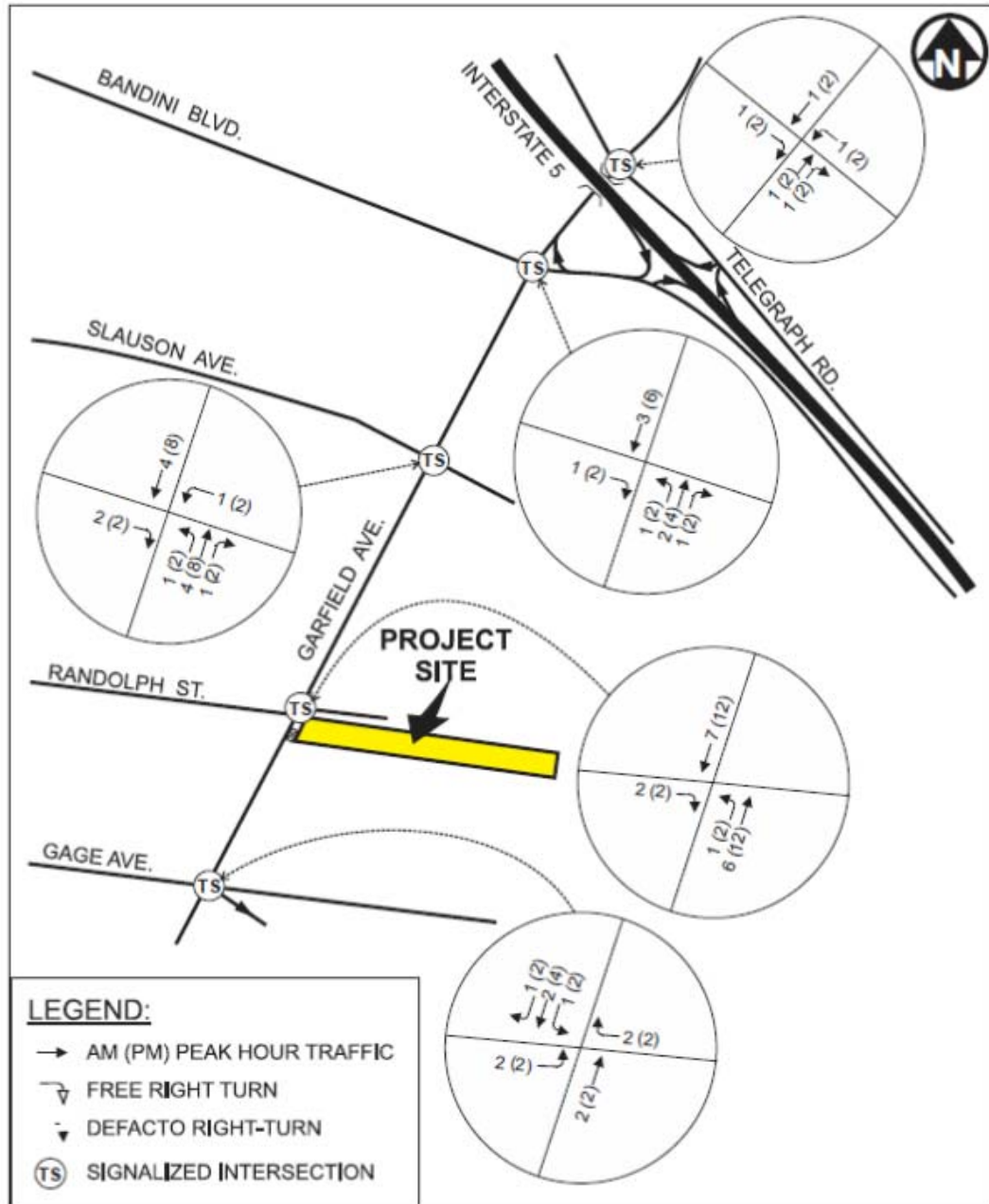


FIGURE 7  
PERCENTAGE DISTRIBUTION



**FIGURE 8  
 PROJECT TRAFFIC VOLUME**



## FUTURE (2020) PLUS PROJECT CONDITIONS

Future (2020) with cumulative project plus project traffic conditions were evaluated using the Intersection Capacity Utilization (ICU) method for signalized intersections and Highway Capacity Manual (HCM) method for unsignalized intersections. Detailed calculations relating to the study intersections are included in the Technical Appendix. The LOS and V/C ratios for the study intersections under future plus project conditions are summarized in Table 7.

**TABLE 7  
EXISTING (2019) AND FUTURE (2020) LEVEL OF SERVICE SUMMARY**

#	Intersection	Control Type	Peak Hour	2019 Existing Conditions		2020 Pre-Project Future Conditions		2020 Future with Project Conditions		Increase in V/C by Project
				LOS	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	
1	Garfield Ave & Randolph St	Signal	AM	A	0.541	A	0.547	A	0.550	0.003
			PM	B	0.669	B	0.682	B	0.687	0.005
2	Garfield Ave & Gage Ave	Signal	AM	C	0.738	C	0.747	C	0.749	0.002
			PM	D	0.855	D	0.867	D	0.868	0.001
3	Garfield Ave & Slauson Ave	Signal	AM	D	0.808	D	0.820	D	0.821	0.001
			PM	C	0.790	C	0.803	D	0.808	0.005
4	Garfield Ave & Bandini Blvd	Signal	AM	B	0.624	B	0.634	B	0.635	0.001
			PM	D	0.824	D	0.841	D	0.843	0.002
5	Garfield Ave & Telegraph Rd	Signal	AM	B	0.652	B	0.658	B	0.659	0.001
			PM	B	0.690	B	0.701	B	0.702	0.001

As shown in Table 7, all the five (5) study intersections are expected to operate at a Level of Service (LOS) D or better. Therefore, the project is not expected to have significant impacts at all the key intersections.



## PROJECT IMPACT AND MITIGATION MEASURES

As indicated in the previous section, all the five (5) study intersections would operate at an acceptable level of service during both the AM and PM peak hours under 2020 Ambient plus Cumulative Projects and Project Conditions.

## PARKING DEMAND ANALYSIS

The Municipal Code of the City of Commerce does not specify the parking requirements for a mini-warehouse use. Therefore, the ITE Parking Generation Manual, 4<sup>th</sup> Edition, was reviewed. The proposed building area is 212,710 square feet. The total parking requirement of the project is 19 spaces  $[= 0.07 \times 212,710 + 4]$ . The number of proposed parking spaces for the self-storage, office and residence is a total of 52 spaces on-site. Therefore, the project's parking demand would be satisfied on-site in accordance with the parking requirement of the ITE Trip Generation (4<sup>th</sup> Edition) as presented in Table 8.

**TABLE 8  
PARKING REQUIREMENT**

LAND USE	SQUARE FEET	PARKING RATIO (WEEKDAY) PER ITE PARKING GENERATION (4th ED)	PARKING SPACE REQUIRED	PARKING SPACE PROVIDED
MINI-WAREHOUSE (SELF-STORAGE)	210,400	$(P) = 0.07x + 4$	$18.89 = 19$	18
OFFICE	1,155			
RESIDENCE	1,155			
R.V. STORAGE	-	-	-	34
TOTAL				52
Note: $x = 1,000$ SF of GFA				

## CONCLUSION

Based on the results of the traffic impact analysis, the proposed Trojan Self-Storage Development would not have any significant impacts on level of service (LOS) at any of the key intersections analyzed in the surrounding roadway system.

A review of Congestion Management Program (CMP) guidelines was also conducted. Since the project will not add 50 or more trips to any CMP arterial monitoring intersection during either the AM or PM weekday peak hours, no CMP arterial monitoring intersection was analyzed in this TIA. The project will not add 150 or more trips on the freeway mainline traffic volume in any direction during the AM or the PM weekday peak hours. Therefore, no freeway monitoring location was required to be analyzed per CMP guidelines.

The project's parking demand and the number of parking spaces provided for parking have also been analyzed using the ITE Trip Generation (4<sup>th</sup> Edition) parking code, and found to adequately meet the requirements for parking.