

Notice of Preparation and Scoping Document for an Environmental Impact Report (EIR)

Whittier Boulevard Business Center Project

CEQA Lead Agency:



City of Whittier
Community Development Department
13230 Penn Street
Whittier, CA 90602

Project Applicant:

Western Realco
500 Newport Center Drive, Suite #630
Newport Beach, CA 92660

CEQA Consultant:

T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

December 12, 2022



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1.0 Introduction

1.1 Document Purpose and Scope

The California Environmental Quality Act (CEQA) is a statewide environmental law contained in Public Resources Code §§ 21000-21177. CEQA applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the physical environment. CEQA requires that public agencies analyze and acknowledge the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts to the environment when avoidance or reduction is feasible. The CEQA compliance process also gives other public agencies and the general public an opportunity to comment on a proposed project's environmental effects.

This Initial Study/Scoping Document assesses the potential of the proposed 12352 Whittier Boulevard Project (Development Review Permit No. DRP21-0065, Conditional Use Permit No. CUP22-0007 and Certificate of Appropriateness No. HRC22-0012; herein, the "Project") and its associated implementing actions to affect the physical environment. The 13.49-acre property is located along the western side of the Whittier Boulevard frontage road, between Philadelphia Street and Pacific Place, in the Whittier Boulevard Specific Plan (WBSP) Workplace District area. The Project Applicant proposes to demolish all existing improvements on the property and redevelop the site with one employment-generating manufacturing building having a maximum of 295,499 square feet (s.f.) of floor space.

As part of the City of Whittier's permitting process, the proposed Project is required to undergo an initial environmental review pursuant to CEQA Guidelines § 15063. This Initial Study/Scoping Document is a preliminary analysis prepared on behalf of and representing the independent judgment of the City of Whittier Community Development Department's Planning Division, acting in its capacity as the CEQA Lead Agency, to determine the level of environmental review and analysis that will be required for the Project. The results of the Initial Study (IS) determine which type of CEQA compliance document will be prepared, which could consist of either an environmental impact report (EIR); mitigated negative declaration (MND); negative declaration (ND); addendum to a previously-prepared EIR; or a tiered analysis that relies on the findings and conclusions of a previously-prepared EIR. This Initial Study is an informational document that provides an objective assessment of the potential environmental impacts that could result from implementation of the proposed Project.

1.2 Scope of Environmental Analysis

City of Whittier prepared the proposed Project's IS Checklist as suggested by CEQA Guidelines §§ 15063(d)(3). The checklist is found in Sections 3.0 and 4.0 and it includes an explanation and discussion of each answer on the form.

There are four possible responses to each of the environmental issues included on the checklist:

1. **Potentially Significant Impact.** This response is used to indicate that there is substantial evidence that the Project would result in an effect that may be significant.



2. **Less than Significant with Mitigation Incorporated.** This response is used to indicate that incorporation of mitigation measures would reduce an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.”
3. **Less-than-Significant Impact.** This response is used to indicate that the Project result in less-than-significant impacts.
4. **No Impact.** This response is used to indicate that the Project would not create an impact in that particular environmental category. “No Impact” answers need to be adequately supported by information which shows that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

1.3 Potential Environmental Effects

The analysis presented in this IS indicates that the proposed Project has the potential to result in one or more significant direct, indirect, and/or cumulative environmental effects to the following environmental subjects, and concludes that an EIR is required for the proposed Project:

- Cultural Resources
- Geology and Soils (Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise (Construction-Related Vibration)
- Tribal Cultural Resources



2.0 Project Description

2.1 Project Location

The City of Whittier is located in southern Los Angeles County, California. Surrounding cities include the City of Pico Rivera to the west, the City of Industry to the northeast, the City of La Habra to the east, and the City of La Mirada to the south. Unincorporated communities of Los Angeles County nearby include Hacienda Heights, North Whittier, West Whittier-Los Nietos and South Whittier. Regional access to the City of Whittier is provided via Interstate 605 (I-605) and State Route 72 (SR-72), also known as Whittier Boulevard.

As shown on Figure 2-1, *Project Location Map*, and Figure 2-2, *USGS Topographic Map*, the 13.49-acre Project site is located at 12352 Whittier Boulevard along the western side of the Whittier Boulevard frontage road, between Walnut Grove Drive and Pacific Place (Assessor's Identification Numbers [AINs] 8170-026-011 and -015). The site is bordered to the north by a commercial public storage facility; to the east by the Whittier Boulevard frontage road, across from which are several commercial properties; and to the south by commercial properties. The southwestern side of the site is bordered by a parking area for the PIH Health Whittier Hospital and the northwestern side of the site is bordered by an area that was the former site of the Fred C. Nelles Youth Correctional Facility, which is presently under redevelopment as a predominately residential community pursuant to the approved Lincoln Specific Plan.

2.2 Environmental Setting and Surrounding Land Uses

As shown on Figure 2-3, *Aerial Photograph*, the Project site is currently developed with three attached buildings with a total building footprint area of approximately 213,430 s.f. The buildings are currently vacant but previously housed the former Leggett and Platt manufacturing facility, which manufactured metal bedframes since the 1950's. In 2009, manufacturing operations ceased and the site was used for the storage and distribution of bedframes until the facility closed. The property contains a surface parking lot with 227 parking stalls and is accessed via a curb cut along the Whittier Boulevard frontage road. Vegetation on the site is minimal, located mainly along the Whittier Boulevard frontage road and along the southwest edge of the site, consisting of ornamental grass, shrubs, and several trees.

The Project site is located in a highly developed, urban area. The land uses surrounding the Project site are described below:

- **North:** The Envision Whittier General Plan designates the property to the north as Innovation, which is intended to accommodate creative design and manufacturing businesses. Existing use to the north is a public storage facility and an industrial building.
- **East:** The Envision Whittier General Plan designates the property to the northeast of the Project site as Innovation and the land to the east as Mixed Use 2 (40 DU/AC). Existing uses to the east include various industrial facilities. The Paradox Hybrid Walnut Tree lies to the east of Whittier Boulevard frontage road.



- **South:** The Envision Whittier General Plan designates the property to the south as Medical, which is intended to accommodate master-planned medical facility complexes. Existing uses to the south include various commercial and industrial facilities.
- **West:** The Envision Whittier General Plan designates property to the southwest as Medical and the existing use of the property is the PIH Health Whittier Hospital. The property to the northwest, currently under construction for a primarily residential development, is designated Lincoln (The Groves or formerly Nelles) Specific Plan, which includes a 75.6-acre community composed of planned residential, commercial, and open space uses.

2.3 General Plan and Whittier Boulevard Specific Plan

The Project site was designated for “General Industrial” by the 1993 Whittier General Plan and this land use designation was in effect at the time the project was submitted to the city for review and when application materials were deemed completed. On October 12, 2021 the 2021-2040 Envision Whittier General Plan was adopted and the land use designation of the project site was changed to “Innovation”. The Innovation land use designation is intended to accommodate creative design and manufacturing businesses focused on new technologies, maker industries, research and development, and craft businesses.

The Project site is zoned as Specific Plan (SP) for the Whittier Boulevard Specific Plan (WBSP) and is within the Workplace District subarea. The mix of allowable uses in the Workplace District includes light manufacturing, office, research and development (R&D), and supportive commercial uses, including large-scale retail. No housing is allowed in this district and manufactured goods storage within industrial buildings is limited to no more than 49% of a building’s floor space. Applicable development standards include: 1) a maximum Floor Area Ratio (FAR) of 2.0; 2) a maximum building height of up to four stories or 45 feet, whichever is less; 3) a minimum front setback of 15 feet; 4) a minimum side setback of 10 feet; 5) a minimum rear setback of 10 feet; and 6) a minimum frontage requirement, which requires that at least 50% of the building footprint must be built up to the back of sidewalk along the Whittier Boulevard frontage road.

2.4 Project Description

2.4.1 Project Overview

The Project involves redevelopment of the 13.49-acre Project site with one employment-generating manufacturing building having up to 295,499 s.f. of floor space, consisting of 288,499 s.f. of ground floor space and 7,000 s.f. of mezzanine space. The Project is proposed on a speculative basis, meaning that the proposed building’s tenant is not known at this time. The building is designed to accommodate uses such as manufacturing, assembly, research and development, light industrial, and related uses, with less than 49% of the building devoted to storage use in compliance with the WBSP’s Workplace District designation. The building is designed with a primary office space facing Whittier Boulevard, a potential future office at the northwest corner of the building, and 24 loading docks positioned on the south-facing side of the building. A total of 417 parking stalls are proposed in a surface parking lot, including 42 parking stalls with Electric Vehicle (EV) charging stations for passenger vehicles.

To redevelop the Project site as proposed, the process would require the demolition of the existing buildings, surface parking lot, landscaping, and other existing features. After demolition is complete, the site would be



prepared for construction and construction of the Project would commence. Demolition and construction would last approximately 12.5 months.

When construction is complete, the site would contain one 295,499 s.f. building that would have a maximum exterior height of 44 feet to the highest point of the roof and an internal maximum clear height of approximately 36 feet, 3 inches. The structure is designed in a contemporary style and is planned to be painted with shades of gray. The office areas in the building would feature large glass windows with a reflective blue/green reflective coating. Figure 2-4, *Conceptual Site Plan*, depicts the Project's proposed site plan.

Vehicular access to the Project site would be accommodated via two proposed driveways connecting the Project site to the Whittier Boulevard frontage road. The driveway in the northeast corner of the Project site would have a 28-foot-wide drive aisle and the driveway in the southeast corner of the Project site would have a 40-foot-wide drive aisle. The north Project driveway would be for passenger vehicles only and the south Project driveway would allow access for both passenger vehicles and trucks.

The applicant has requested relief from development standards under the Development Hardship provisions (Section 4.7) of the WBSP. Section 4.7 Development Hardships provides a process for a property owner to develop or redevelop a site when the development standards and/or design guidelines in the Specific Plan substantially limit or fully prevent a site's development thereby causing a severe hardship to the property owner for which a zoning variance either does not apply or does not provide the necessary relief. A Conditional Use Permit may be granted to enable reasonable development, provided that the applicant presents clear and convincing evidence that strict adherence to all applicable development standards and/or design guidelines will substantially limit or fully prevent viable development or redevelopment of the site and the approval authority can make the additional required findings.

The applicant has submitted CUP22-0007 that involves a request to modify the development standards for orchard parking (Section 4.0.5.m.4.d)) and publicly accessible open space (Section 4.0.5.n.) under the Development Hardship provisions of the Whittier Boulevard Specific Plan (WBSP).

Section 4.0.5 Standards for Specific Land Uses, m. Parking Location for Properties Facing Whittier Boulevard, 4. Design., d) that states surface parking areas shall be planted with 36-inch box shade trees within six-foot landscaping fingers at a ratio of at least one tree for every five spaces in an "orchard" planting arrangement. Where renovation, enlargements or use changes occur within an existing retail building, parking areas must be improved to include pedestrian connections between street and storefronts, and must be planted in an "orchard" planting arrangement as well. Use of shade trees less than 36-inch box size may be granted at the discretion of the approval authority.

Section 4.0.5 Standards for Specific Land Uses, n. Publicly Accessible Open Space for Nonresidential Uses provides for the following:

1. New nonresidential development shall provide physically delineated, usable, publicly accessible open space along the front of a single building or within a highly visible and easily accessible area between multiple buildings on the same property.



2. Required parking or setback areas shall not count towards the open space requirement.
3. Open space must be located on-site, except that open space for nonresidential uses in the Shopping Cluster may be constructed off-site if located within 500 feet of the proposed project. Publicly accessible open space shall be in the form of plazas, public greens or squares, or widened sidewalks. Large-Scale Retail Establishments, as defined in Appendix A, shall include at least one of the following:
 - Green or Open Space
 - Outdoor Patio Or Seating Areas
 - Architectural Landmarks (i.e. a clock tower), Public Art or Water Features

| Building Size by Gross Floor Area | Minimum Public Gathering/Open Space |
|--------------------------------------|---|
| Up to 9,999 sq ft | Not required |
| 10,000 – 19,999 sq ft | 1,000 sq ft |
| 20,000 sq ft and over | 5% of the total building gross floor area, up to a maximum of 3,000 sq ft |

4. The minimum depth and width dimensions of required open space area for new development shall be 20 feet. In instances where the proposed development has corners, angles, or other unique architectural features or the lot has an irregular configuration, the minimum depth or width dimension of the open space area may be reduced by up to five feet, provided that the opposite dimension is increased in the same amount for the length of the modification.
5. Existing development that is being enlarged, expanded, or otherwise redeveloped shall provide publicly accessible open space area in the same amounts as for new development, except as otherwise allowed in compliance with Section 4.7 (Development Hardships).
6. Plazas must be located where high levels of pedestrian activity are expected, such as adjacent to major entrances and food services such as delis, restaurants, coffee shops and bakeries. Building entries and windows must look onto plazas to enhance activity and security. Plazas must be designed to provide shade, and have decorative paving. If accompanied by a building entry, plazas may occur within front or corner side setbacks, with trellises and similar structures being allowed to project five feet into the front and street side yard setback areas. Outdoor seating, tables and umbrellas, public art, water features, landscaping, gazebos, or other features are encouraged in plazas and must be consistent with the architectural style of the project.
7. For all developments, the property owner shall provide binding agreements addressing issues of common interest in terms of maintenance of publicly accessibility to open space, and the maintenance of street planter areas, planting strips and walks.

2.4.2 Proposed Discretionary Approvals

This Initial Study has been prepared to address the approvals and permits needed for construction and operation of the Project, whether or not such actions are known or are explicitly listed, herein. Anticipated approvals required from the City of Whittier and other agencies to implement the Project include, but are not limited to:

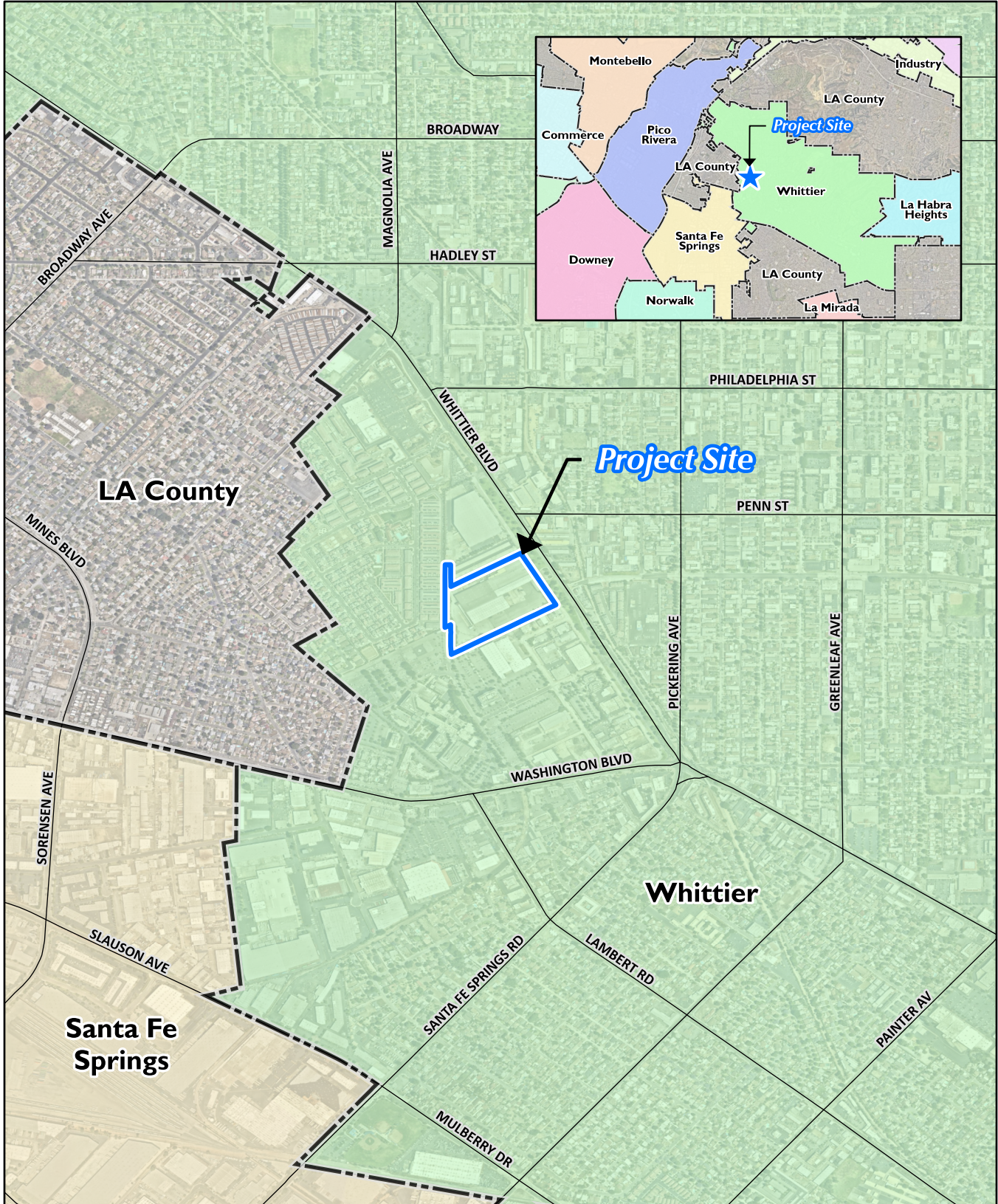


- City of Whittier: The Project Applicant is seeking approval of the following actions:
 - Development Review Permit No. DRP21-0065, a proposal to allow for redevelopment of the Project site with one building with an overall square footage of 295,499 s.f., which includes a building footprint of 288,499 s.f. and approximately 7,000 s.f. of mezzanine space, along with associated landscaping, lighting, and off-street parking.
 - Conditional Use Permit No. CUP22-0007 is being requested to grant a development hardship for orchard parking (Section 4.0.5.m.4.d)) and publicly accessible open space (Section 4.0.5.n.) under the Development Hardship provisions of the Whittier Boulevard Specific Plan (WBSP).
 - Certificate of Appropriateness No. HRC22-0012 to authorize the proposed demolition of the onsite structures.

- Los Angeles County Fire Department: Approval of proposed fire protection services.

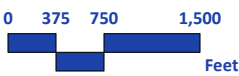
- Los Angeles County Flood Control District. Approval of proposed drainage infrastructure and the proposed drainage outlet into the side slope of the existing open channel.

- Los Angeles Regional Water Quality Control Board (RWQCB): Approval of a National Pollutant Discharge Elimination System (NPDES) permit for construction.

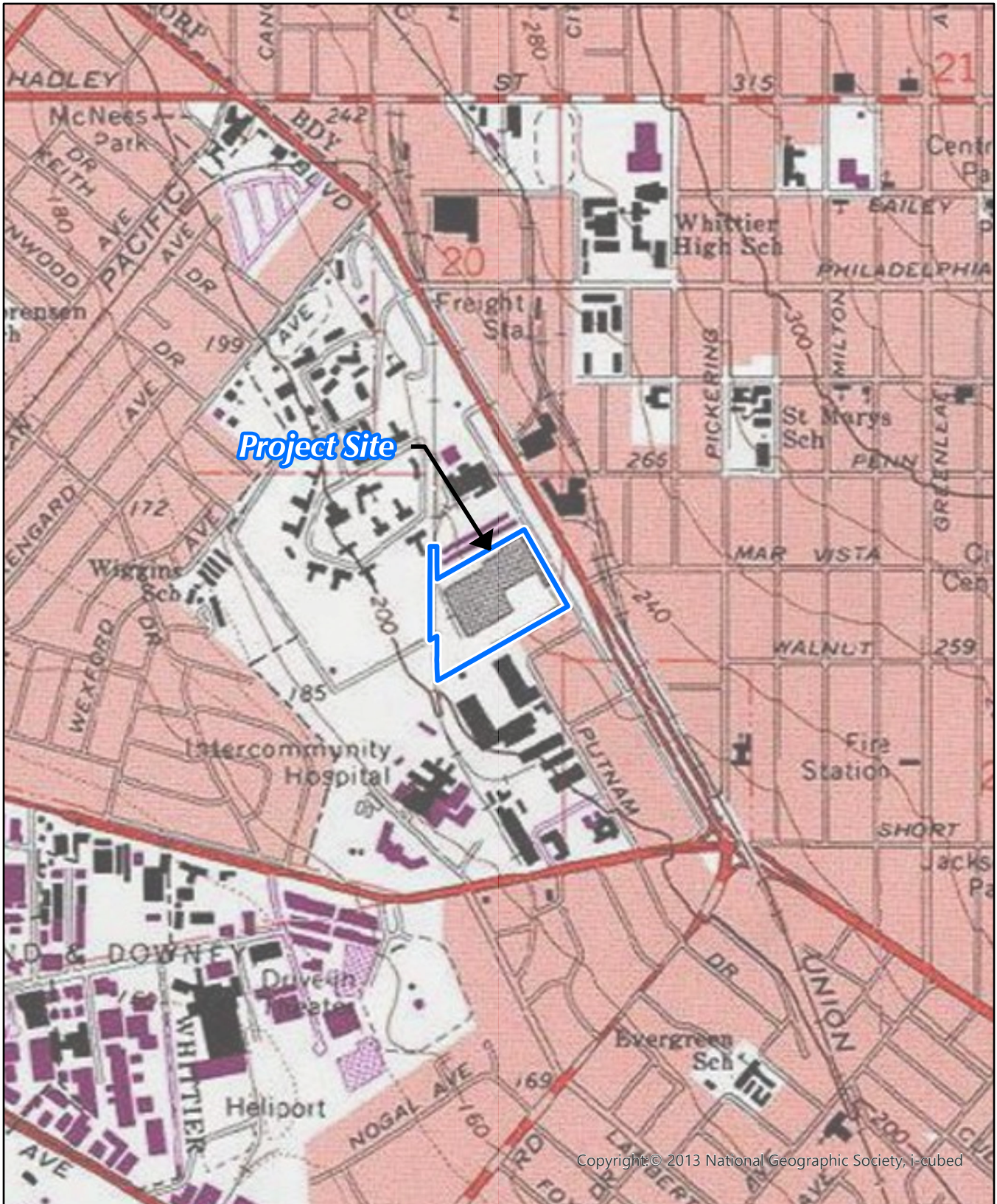


Source(s): Esri, LA County (2022), Nearmap Imagery (2022)

Figure 2-1

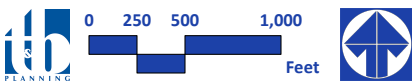


Project Location Map

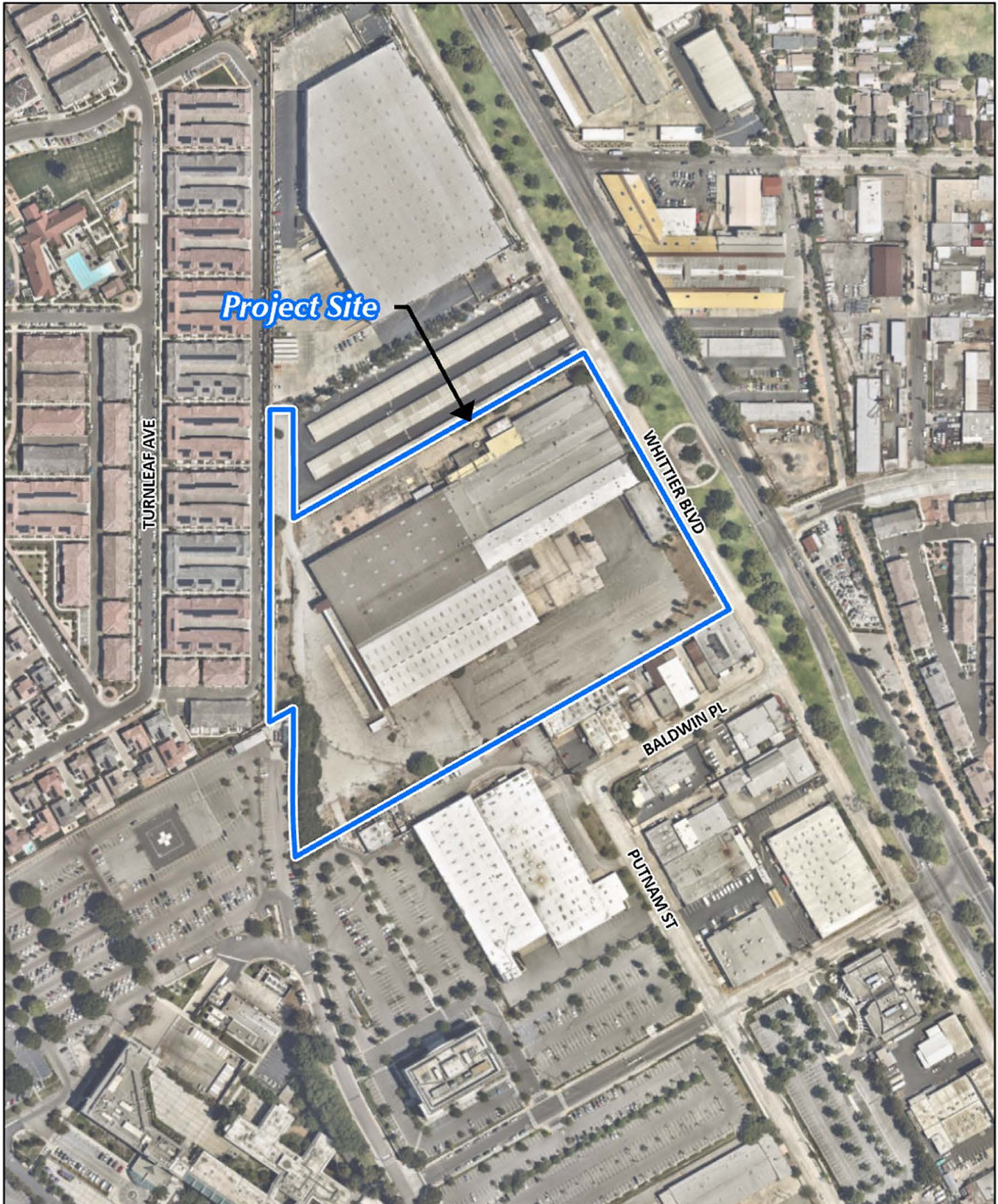


Source(s): Esri, USGS (2013)

Figure 2-2



USGS Topographical Map



Source(s): Esri, Nearmap Imagery (2022)

Figure 2-3



Aerial Photograph

Project Directory

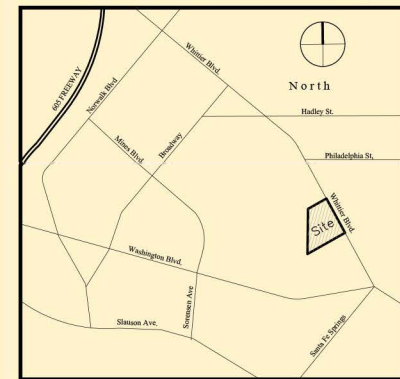
DEVELOPER / APPLICANT:
WESTERN REALCO, LLC
500 Newport Center Drive, Suite 630
Newport Beach, California 92660
Telephone: 949 720 3788
Contact: Gary Edwards
gedwards@westernrealco.com

ARCHITECT:
BASTIEN AND ASSOCIATES, INC.
15661 Red Hill Avenue, Suite 150
Tustin, California 92780
Telephone: 714 617 8600
Contact: Mike McAndrew
mmcandrew@bastienarchitects.com

CIVIL:
THIENES ENGINEERING
14349 Firestone Blvd.
La Mirada, CA 90638
Telephone: 714 521 4811
Contact: Brian Thienes
briant@thieneseng.com

LANDSCAPE:
EMERALD DESIGN
305 N. Harbor Blvd., Suite 222
Fullerton, CA 92832
Telephone: 714 680 0417
Contact: Charles Lamb
charles@emerald1adesign.com

Vicinity Map (N.T.S.)



Legend

- Existing Property Line
- - - Setback Line
- - - Potential Interior Wall Location
- Fencing
- E.V. Electric Vehicle Charging Station Stall
- Solid Dark Hatch Represents Landscape Area
- Diagonal Hatch Represents Painted Striping
- Solid Light Hatch Represents On-Site Hardscape
- Dark Hatch Represents Enhanced Hardscape
- ⓐ Parking Stall Count Reference

Scope of Work

- Single New Concrete Tilt Industrial Building
- All new Drives shall be Asphalt or Concrete Paving.
- All new Walks shall be concrete with medium Broom Finish
- Public Improvements as directed by City Staff.
- All new Landscaping Per City Requirements

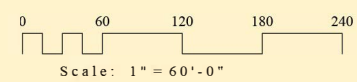
Legal Description

Parcel 2 of Parcel Map no. 60391, in the city of Whittier, county of Los Angeles, state of California, as per map file # in book 326, page 39-43 of parcel maps, in the office of the county recorder of said county.

Parcel Numbers

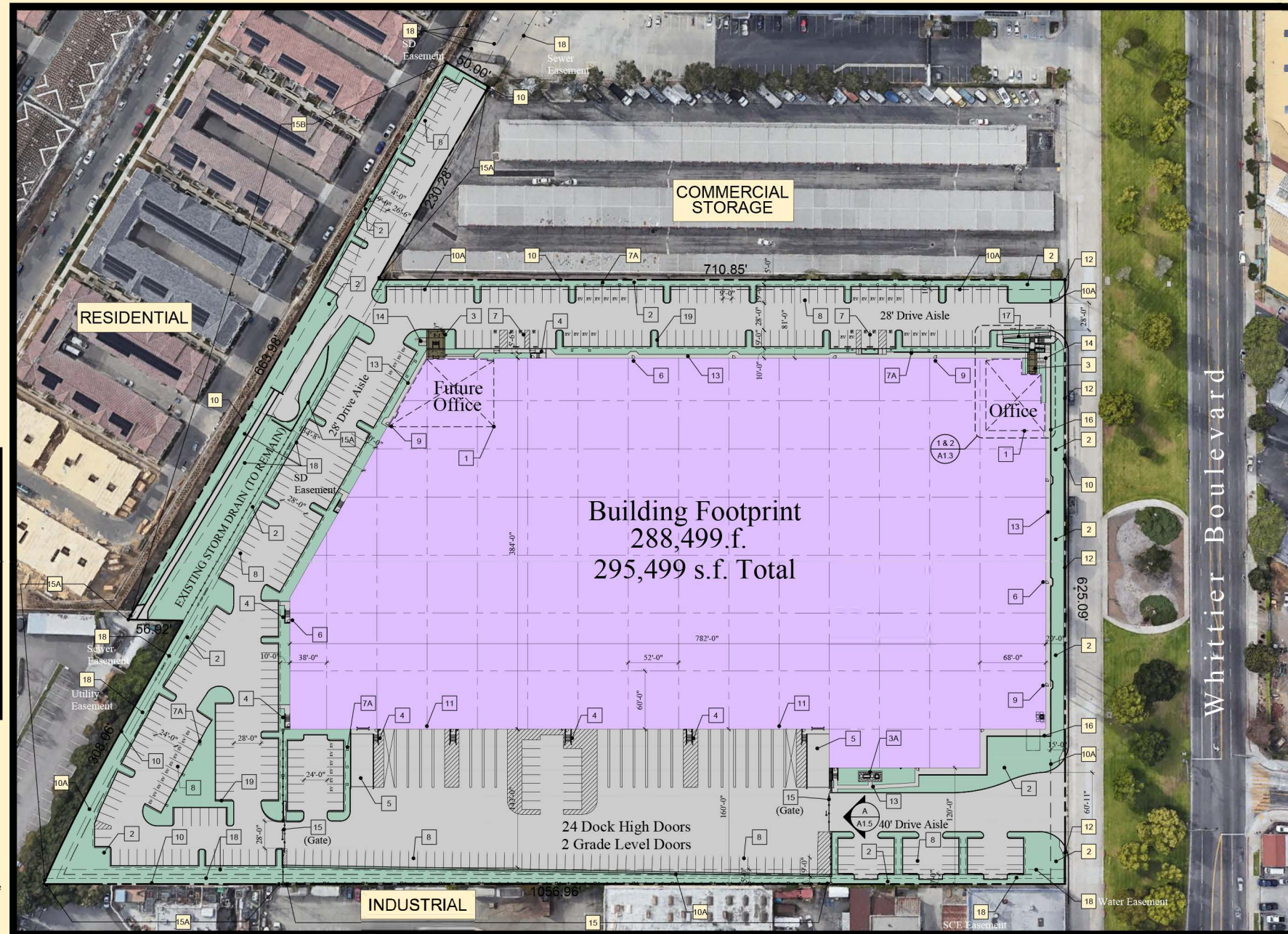
8170-026-011 8170-026-015

CONCEPTUAL SITE PLAN



Planning Information

General Plan Zone: General Plan (GP) - Specific Plan
 Specific Plan: Whittier Blvd. Specific Plan (Workplace District)
 Blg. Setbacks: 15' On Whittier Blvd. 'East'
 10' On the South property line
 10' On the West property line
 10' On the North property line



Site Plan Summary

| | | |
|--|----------------------|--------------|
| Gross Site Area | 13.49 Acres | 587,672 s.f. |
| Total Building Footprint | | 288,499 s.f. |
| Total Building Area (Including 7,000 s.f. Mezz) | | 295,499 s.f. |
| Gross Site Coverage | | 49.09% |
| Gross Floor Area Ratio (Including Mezz) | | 50.28% |
| Parking Required | | 417 Stalls |
| Office | 14,000 s.f. 1/300 | 47 Stalls |
| Manufacturing | 136,705 s.f. 1/500 | 273 Stalls |
| Distribution | 144,794 s.f. 1/1,500 | 97 Stalls |
| Parking Provided (1.41 Stalls per 1,000 s.f.) | | 417 Stalls |
| Electric Vehicle Charging Station Required (10% of Total Actual Stalls for Project w/201 Stalls or more) | | 42 |
| Electric Vehicle Charging Station Provided | | 42 |
| Bike Parking (4 Bikes for first 50,000 sq/ 1 Bike for each additional 50,000 sq) | | 9 Bikes |
| Landscape Required (10% Min.) | | 58,767 sf. |
| Landscape Provided | | 78,889 sf. |

Sheet Index

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| A 0.1 SITE PHOTOGRAPHIC SURVEY | C1 CONCEPTUAL GRADING PLAN |
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| L5 LANDSCAPE PLAN - AREA 3 | |
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General Notes

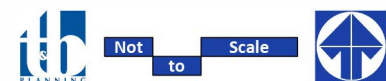
1. Site Plan Shall Meet All Engineering and NPDES Requirements.
2. All Lighting Shall Conform with the Municipal Standards
3. All Signage Shall Conform with the Municipal Standards
4. All Hardscape Shown on Plan will be installed as either Concrete or Asphalt Paving
5. All Parking Spaces are shown as Standard Size Stalls
6. All Mechanical Equipment and Screening Shall Conform with the Municipal Standards
7. All Public Improvements Shall Conform with the Municipal Standards
8. Roof will be able to accommodate the installation of the appropriate number of solar panels.

Key Notes

- 1 Approximate Extent of Office Area - Typ. (Anticipated to be Built with Shell Construction)
- 2 Green Shaded Area Represents Landscaping - Typ. (See Legend)
- 3 Decorative Colored Concrete with Exposed Aggregate at Main Building Entrance. Decomposed Granite w/ 1'-0" concrete band Lunch Area at "3A". See Landscape drawings.
- 4 Concrete Stairs and Painted Metal Railings - Typ
- 5 Ramp Up to Ground Level Service Door - Typ.
- 6 Fire Dept. Access Door at 125'-0" max
- 7 Accessible Parking with Accessible Path to Entry - Typ. Provide Conduit And J-Box For Future Electric Vehicle (EV) Dual Charging Station at "7A"
- 8 Standard Parking Space: 9'-0" x 19'-0" (17'-0" w/ 2' Overhang, where occurs)
- 9 Grade Level Exit Door Connected to Path of Travel
- 10 Property Line - Refer to Civil. Building Setback Line at "10A"
- 11 Vertical Lift, Sectional Door - Painted to Match adjacent Wall - Typ.
- 12 Existing Public Sidewalk - Refer to Civil
- 13 On-Site, Concrete Sidewalk (48" Wide Minimum) Natural Color with Medium Broom Finish - Refer to Civil
- 14 Bike Rack (5 Bikes) by Dero Rack (Hitch style) Color: Green
- 15 8'-0" high Steel Tube Fence w/ 2'-0"x2'-0" Concrete Pilasters at ±40'-0" on center. Existing 6'-0" High Chain link Fence to remain at "15A". Existing CMU wall at "15B". Provide Fire Department Approved Knox Box or Equal at all Gates within Fire Lane.
- 16 Natural Concrete Retaining Wall (Not in Public View) - Refer to Civil
- 17 ADA Compliant Concrete Ramp and Integrated Stair with Painted Metal Handrails for Accessible Path of Travel to Public Way.
- 18 Easement - Refer to Civil
- 19 12" wide concrete "Step-out" - Typ. See sheet A1.3 for typical detail.

Source(s): Bastien and Associates, Inc. (04-02-2022)

Figure 2-4





3.0 Environmental Checklist

1. Project Title: Whittier Boulevard Business Center
2. Lead Agency Name and Address: City of Whittier, Community Development Department, 13230 Penn Street, Whittier, CA 90602
3. Contact Person and Phone Number: Ellen Fitzgerald, Principal Planner; Phone number: (562) 567-9320; E-mail: efitzgerald@cityofwhittier.org
4. Project Location: 12352 Whittier Boulevard, Whittier, California 90606. Specifically, the Project site is located along the western side of the Whittier Boulevard frontage road, between Walnut Grove Drive and Pacific Place, and includes Assessor's Identification Numbers (AINs) 8170-026-011 and 8170-026-015. The project is in the NW1/4 of the NW1/4 of Section 28 Township 2 South, Range 11 West of the San Bernardino Principal Meridian. It has a latitude and longitude of 33° 58' 24" North, 118° 02' 50" West.
5. Project Applicant: Western Realco, LLC, 500 Newport Center Drive, Suite #630, Newport Beach, CA 92660
6. General Plan Designation: Innovation
7. Zoning: Specific Plan (SP); Whittier Boulevard Specific Plan Workplace District
8. Description of Project: The Project involves redevelopment of the Project site with one concrete tilt-up employment-generating manufacturing building totaling up to 295,499 s.f. The building would have 24 loading docks on the south-facing side and be supported by a truck yard, vehicular parking/drive aisles, and landscaping. The Project would require the demolition of all existing uses on the property to redevelop the site as proposed. Refer to Section 2.0 for a complete description of the proposed Project.
9. Surrounding Land Uses and Setting: The Project site is located in a highly developed, urban area. The Envision Whittier General Plan designates the site and the property to the north and northeast as Innovation. The property to the southeast is designated as Mixed Use 2 (40 DU/AC). The property to the south and southwest is designated as Medical. The property to the northwest is designated as Specific Plan for the Lincoln (The Groves or formerly Nelles) Specific Plan and is currently nearing the end of construction with residential housing adjacent to the Project. Refer also to Subsection 2.2 of this Initial Study/Scoping Document.
10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participation agreement): Los Angeles County Fire Department: Approval of proposed fire protection services; Los Angeles County Flood Control District: Approval of proposed drainage infrastructure and the proposed drainage outlet into the side slope of the existing open channel; and Los Angeles Regional Water Quality Control Board (RWQCB): Approval of a National Pollutant Discharge Elimination System (NPDES) permit for construction.



11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? Yes, Native American tribes traditionally and culturally affiliated with the Project area were identified and sent notification of the Project. One tribe requested consultation. The consultation has been completed pursuant to Public Resources Code section 21080.3.1, and the results are contained in Section 4.1.18 Tribal Cultural Resources below.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that would require mitigation, as indicated by the checklist on the following pages.

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



3.2 Determination

On the basis of this initial evaluation:

| | |
|--|-------------------------------------|
| I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. | <input type="checkbox"/> |
| I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. | <input type="checkbox"/> |
| I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. | <input checked="" type="checkbox"/> |
| I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. | <input type="checkbox"/> |
| I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. | <input type="checkbox"/> |

Signature

December 13, 2022

Date

Name and Title: Ellen Fitzgerald, Principal Planner, City of Whittier



3.3 Evaluation of Environmental Impacts

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.



- 9) The explanation of each issue should identify:
- a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significant.



4.0 Environmental Analysis

4.1 Evaluation of Environmental Impacts

4.1.1 Aesthetics

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Except as provided in Public Resources Code Section 21099, would the Project: | | | | |
| a) <i>Have a substantial adverse effect on a scenic vista?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) <i>In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) <i>Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Would the Project have a substantial adverse effect on a scenic vista?*

Less-than-Significant Impact. As described by the General Plan Environmental Impact Report (GPEIR) prepared for the Envision Whittier General Plan, scenic vistas are defined as natural landscapes that provide views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces, and waterbodies. The GPEIR identified views of the Puente Hills as a scenic vista, which consists of a major topographic and open space feature that is located approximately 1.4 miles to the northeast of the Project site. (City of Whittier, 2021a, p. 4.1-1)

Under existing conditions, public views of the Project site and surrounding areas are mostly limited to the Whittier Boulevard frontage road to the east of the Project site, as public views from the north and south are obstructed or precluded by existing industrial and commercial developments, and views from the west are obstructed by an existing block wall located along the eastern side of Blue Sky Court and existing dense vegetation along the southwest corner of the Project site.

In order to evaluate the Project’s potential to adversely affect scenic vistas, including views of the Puente Hills, a photographic inventory of the Project site has been prepared and is presented on Figure 4-1, *Site Photographic Analysis*. As shown on Photos 1 through 8, under existing conditions views of the Puente Hills are fully obstructed by the existing buildings on site, landscaping, and development in the surrounding areas.



Source(s): Bastien and Associates, Inc. (03-11-2022)

Figure 4-1



As part of the Project, the existing buildings and landscaping on site would be demolished, and a new 295,499 s.f. building would be constructed along with parking areas and landscaping around the building and along the edges of the Project site. With implementation of the Project as proposed, views of the Puente Hills from the Whittier Boulevard frontage road would continue to be obstructed, similar to existing conditions. There are no other scenic vistas available within the Project area.

Based on the foregoing analysis, the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

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. The California Department of Transportation (Caltrans) manages the State Scenic Highway Program. Caltrans provides guidance to local government agencies, community organizations and citizens that are pursuing the official designation of a State Scenic Highway. The Project site is not within or near a State scenic highway. The nearest officially designated state scenic highway, State Route 91 (SR-91), is located more than 14 miles southeast of the City of Whittier in Anaheim Hills and would not be visible to motorists from the Project site. The nearest Eligible State scenic highway is a portion of the SR-57 freeway between Imperial Highway and the SR-60 freeway to the City of Industry (Caltrans, n.d.). The Eligible portion of SR-57 is approximately 10.0 miles east of the Project site and is not visible from the Project site due to distance and intervening topography, development, and landscaping (Google Earth, n.d.). Furthermore, the Project site is fully developed with light industrial buildings and does not contain any scenic resources visible from off-site locations, such as visually significant trees or rock outcroppings. Although the buildings on site represent historical resources, the historic nature of the buildings is related to the historic use of the site by the Ekco Products Company, prior to the use of the site by Leggett and Platt, and the buildings are not considered historic based on their architectural or other visual characteristics (Duke CRM, 2022, p. 3). Accordingly, the Project would not impact scenic resources within a State designated scenic highway, and no impact would occur. Therefore, no further analysis of this topic is required.

c) *Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less-than-Significant Impact. The U.S. Census Bureau defines an “urbanized area” as a densely settled core or census tracts and/or census blocks that have 50,000 or more residents and meet minimum population density requirements while also being adjacent to territory containing non-residential urban land uses. The Project site is located within the Los Angeles-Long Beach-Anaheim urbanized area (USCB, 2012); therefore, the analysis of potential impacts to visual character considers whether the Project design conflicts with applicable zoning and/or regulations governing scenic quality.

Regulations governing scenic quality are established through the City’s Municipal Code, General Plan, and by the WBSP. The Project has been designed to comply with all applicable provisions of the City’s Municipal Code related to visual quality. The Project also would be consistent with all policies related to scenic quality in the Envision Whittier General Plan. In addition, and with exception of the proposed development hardship



reliefs, as proposed by CUP22-0007, the Project would comply with all of the intensity and dimensional standards set forth in Table 4-2 of the WBSP. Furthermore, the Project has been designed in conformance with the WBSP Design Guidelines, which include requirements related to building massing, architectural style, facades, roofs, building accessories, color, and streetscapes, all of which were identified in order to ensure future development within the WBSP area enhances and does not degrade visual quality. Accordingly, the Project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

d) *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views?*

Less-than-Significant Impact. Under existing conditions, the Project site is fully developed as a manufacturing facility. Lighting includes security lighting along the existing façades of the buildings, along with several light poles within the parking lots. Land uses in the surrounding area also are associated with artificial lighting, and include a variety of industrial and commercial uses to the north, east, and south, and a residential community under development to the northwest. While no streetlights are located on the Whittier Boulevard frontage road at the Project site, there are streetlights located along the frontage road north and south of the Project site. Streetlights also are located to the east of the Project site at the intersection of Whittier Boulevard and Mar Vista Street. The Project would introduce new light sources to the Project site as necessary for security, safety, and wayfinding.

The Project would be required to adhere to the lighting requirements as set forth in the City of Whittier Municipal Code, Section 18.98.030.K, which specifies design guidelines for manufacturing development, including requirements related to lighting. Section 18.98.030.K requires that “[e]xterior lighting standards should be located and designed to minimize direct glare beyond the parking lot or service area.” The Project also would be required to comply with the requirements of subsection 5.5.4 (Corridor-Wide Design Guidelines – Lighting) of the WBSP, which includes the following requirements to preclude lighting impacts:

- *“Unnecessary glare should be avoided. Commercial buildings and landscaping can be illuminated indirectly by concealing light features within buildings and landscaping to highlight attractive features and avoid intrusion into neighboring properties.”*
- *“Fixtures should use a reflector and/or a refractor system for efficient distribution of light and reduction of glare.”*
- *“Sharp cut-off type fixtures are recommended, to prevent light from being emitted above the horizontal relative to the light source. Small decorative “glow” elements are permitted to emit light above the horizontal. Alternatively or in addition, fixtures should use a refractive prismatic diffuser globe to direct light downward and focused in a pattern as desired.”*
- *“House side shields and internal reflector caps should be used to block light from illuminating residential windows.”*
- *For uplighting, “[s]hielding and careful placement should be used to prevent spill light from visibility by pedestrians, motorists, and nearby residential dwelling windows. At parking lots adjacent to single-family homes, a combination of mounting height and luminaire shields should be used to protect*



residences from glare. In general, light sources should be kept low to maintain pedestrian scale and prevent spill light from impacting adjacent properties.

The City would confirm compliance with applicable lighting requirements of the City’s Municipal Code and the WBSF during future review of building permit applications/plans. Mandatory compliance with the Municipal Code and WBSF would ensure that the Project would not introduce any permanent design features that would adversely affect day or nighttime views in the area.

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. Exterior building materials proposed as part of the Project primarily include concrete, painted metal, and tempered glass. The proposed tempered glass is described by the manufacturing as having a “low” reflectivity. These non-reflective building materials would not result in potential glare impacts within the Project site or surrounding areas, and glare impacts would be less than significant.

Based on the foregoing analysis, implementation of the Project would not result in a significant source of light or glare that would adversely affect daytime or nighttime views, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

4.1.2 Agriculture and Forestry Resources

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) <i>Conflict with existing zoning for agricultural use, or a Williamson Act contract?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) <i>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))?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) <i>Result in the loss of forest land or conversion of forest land to non-forest use?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) <i>Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



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. According to mapping information available from the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC, 2021). The nearest area of any FMMP significance is a relatively small area of Prime Farmland located at the northeast corner of Durfee Avenue and Rosemead Boulevard, approximately 3.9 miles to the north of the Project site. Given the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, no impact would result. Therefore, no further analysis of this topic is required.

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 SP (Specific Plan) and is within the Workplace District of the WBSP, which does not permit agricultural uses. The Project's implementation would not require a zone change and would not result in a loss of land zoned for agriculture. The Project site is mostly paved and vegetation onsite is minimal. There are no farming activities occurring at the site. The Project site is not located within any agricultural preserves, nor is the Project site subject to any Williamson Act Contracts. As a result, the Project would not result in conflict with existing agricultural zoning or Williamson Act contracts, and no impact would occur. Therefore, no further analysis of this topic is required.

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. Under existing conditions, the Project site's zoning does not allow for forest land uses. Furthermore, the Project site is fully developed under existing conditions, and does not contain any large stands of trees that could be used for forestry purposes. There are no lands surrounding the Project site or within the Project vicinity that are zoned for forestry or timberland production uses. Accordingly, the Project has no potential to 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)), and no impact would occur. Therefore, no further analysis of this topic is required.

d) *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. As indicated in the response to Threshold 4.1.2.c), the Project site and surrounding areas do not consist of forest land. As such, the Project has no potential to result in the loss of forest land or result in the conversion of forest land to non-forest use, and no impact would occur. Therefore, no further analysis of this topic is required.



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

No Impact. As indicated in the analysis of Thresholds 4.1.2.a) through d), the Project site and surrounding areas do not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and there are no lands used for forestry or timberland production in the Project vicinity. Accordingly, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use, and no impact would occur. Therefore, no further analysis of this topic is required.

4.1.3 Air Quality

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| a) <i>Conflict with or obstruct implementation of the applicable air quality plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) <i>Expose sensitive receptors to substantial pollutant concentrations?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) <i>Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

An *Air Quality, Global Climate Change, HRA, and Energy Impact Analysis* was prepared for the Project by Ganddini Group, Inc. to evaluate potential criteria and hazardous air pollutant emissions that could result from the Project’s construction and operation. This report is dated February 11, 2022 and is included as *Appendix A* to this Initial Study/Scoping Document. It should be noted that the analysis presented in *Appendix A* assumes the Project site would be developed with a 294,800 square foot industrial building with a 288,800 s.f. footprint, whereas the Project consists of 295,499 s.f. of floor space with a 288,499 s.f. building footprint. The discrepancy between what was studied in *Technical Appendix A* and what is proposed as part of the Project represents a *de minimus* increase in building area that does not affect the results or conclusions with respect to the Project’s potential air quality impacts. (Ganddini, 2022a)

a) *Would the Project conflict with or obstruct implementation of the applicable air quality plan?*

Less-than-Significant Impact: The Project site is located within the South Coast Air Basin (SCAB). The SCAB encompasses approximately 6,754 square miles and includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. In these areas, the South Coast Air Quality Management District (SCAQMD) is principally responsible for air pollution control and works directly with the Southern California Association



of Governments (SCAG), county transportation commissions, local governments, as well as State and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State and federal ambient air quality standards.

Currently, State and federal air quality standards are exceeded in most parts of the Basin. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current AQMP, the 2016 AQMP, was adopted by the SCAQMD in March 2017. Criteria for determining consistency with the AQMP are defined in Chapter 12, § 12.2, and § 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). The Project's consistency with these criteria and the 2016 AQMP is discussed below.

- *Consistency Criterion No. 1: The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). As evaluated under Thresholds 4.1.3.b) and 4.1.3.c), below, the Project would not exceed regional or localized significance thresholds for any criteria pollutant during construction or during long-term operation with the application of mandatory regulatory requirements. Therefore, the Project would not violate either the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). Accordingly, the Project's regional and localized emissions would not contribute substantially to an existing or potential future air quality violation or delay the attainment of air quality standards, and the Project would therefore be consistent with Consistency Criterion No. 1. (Ganddini, 2022a, p. 44)

- *Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The growth forecasts used in the AQMP to calculate future air pollutant emissions levels are based in part on land use data provided by the general plans of the various jurisdictions within the SCAB. Projects that increase the intensity of use on a subject property may, as compared to its general plan designation, result in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. However, if a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the AQMP. The 2016 AQMP was based on the prior General Plan that was in effect at the time, which designated the Project site for General Industrial (GI) land use. As part of the Project, the Project site would be developed with 295,499 s.f. of manufacturing use. The Project would be consistent with the "GI" land use designation for the subject property and therefore, would be consistent with the growth assumptions used in the AQMP and would not exceed the AQMP's long-term emissions projections. On the basis of the foregoing analysis, the Project would be consistent with Consistency Criteria No. 2. (Ganddini, 2022a, p. 44)



Based on the analysis presented above, the Project would not conflict with or obstruct implementation of the 2016 SCAQMD AQMP, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Less-than-Significant Impact: As indicated under the analysis of 4.1.3.a), the SCAQMD is principally responsible for air pollution control within the SCAB. The CAAQS designate the SCAB as nonattainment for ozone (O₃), PM₁₀, and PM_{2.5}, while the NAAQS designates the Project area as nonattainment for O₃ and PM_{2.5} (Ganddini, 2022a, Table 3). Accordingly, the Project would result in a cumulatively-considerable net increase of criteria pollutant for which the Project region is non-attainment if the Project were to exceed the SCAQMD regional thresholds for NO_x or Volatile Organic Compounds (VOCs), both of which are ozone precursors, or if the Project were to exceed the SCAQMD regional thresholds for PM₁₀ or PM_{2.5}.

The proposed Project has the potential to generate substantial pollutant concentrations during both construction activities and long-term operation. The following analysis is based on the applicable significance thresholds establish by the SCAQMD (which are based on federal and State air quality standards). This analysis assumes that the proposed Project would comply with applicable, mandatory regional air quality standards, including SCAQMD Rule 403, “Fugitive Dust;” SCAQMD Rule 431.2. “Sulfur Content of Liquid Fuels;” SCAQMD Rule 1113, “Architectural Coatings;” SCAQMD Rule 1186, “PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations;” SCAQMD Rule 1186.1, “Less-Polluting Street Sweepers,” and Title 13, Chapter 10, § 2485, Division 3 of the California Code of Regulations “Airborne Toxic Control Measure.”

For a detailed description of the health effects of air pollutants, refer to *Technical Appendix A*. In general, air pollutants have adverse effects to human health, including but not limited to, respiratory illness, and carcinogenic effects.

SCAQMD Regional Significance Thresholds

Many air quality impacts that derive from dispersed mobile sources, which are the dominate pollution generators in the SCAB, often occurs hours later and miles away after photochemical processes have converted primary exhaust pollutants into secondary contaminants such as ozone. The incremental regional air quality impact of an individual project is generally very small and difficult to measure. Therefore, the SCAQMD has developed significance thresholds based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a project is not quantifiable on a regional scale. The SCAQMD CEQA Handbook states that any project in the SCAB with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. Table 4-1, *SCAQMD Air Quality Significance Thresholds*, presents the SCAQMD regional thresholds (identified in Table 4-1 as “Mass Daily Thresholds”). (Ganddini, 2022a, p. 27)



Table 4-1 SCAQMD Air Quality Significance Thresholds

| Mass Daily Thresholds | | |
|---|--|---------------------|
| Pollutant | Construction (lbs/day) | Operation (lbs/day) |
| NOx | 100 | 55 |
| VOC | 75 | 55 |
| PM10 | 150 | 150 |
| PM2.5 | 55 | 55 |
| SOx | 150 | 150 |
| CO | 550 | 550 |
| Lead | 3 | 3 |
| Toxic Air Contaminants, Odor and GHG Thresholds | | |
| TACs | Maximum Incremental Cancer Risk \geq 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas \geq 1 in 1 million) Chronic & Acute Hazard Index > 1.0 (project increment) | |
| Odor | Project creates an odor nuisance pursuant to SCAQMD Rule 402 | |
| GHG | 10,000 MT/yr CO ₂ e for industrial projects | |
| Ambient Air Quality Standards | | |
| Pollutant | SCAQMD Standards | |
| NO ₂ -1-hour average | 0.18 ppm (338 $\mu\text{g}/\text{m}^3$) | |
| PM10 -24-hour average | 10.4 $\mu\text{g}/\text{m}^3$ | |
| Construction | 10.4 $\mu\text{g}/\text{m}^3$ | |
| Operations | 2.5 $\mu\text{g}/\text{m}^3$ | |
| PM2.5 24-hour average | 10.4 $\mu\text{g}/\text{m}^3$ | |
| Construction | 10.4 $\mu\text{g}/\text{m}^3$ | |
| Operations | 2.5 $\mu\text{g}/\text{m}^3$ | |
| SO ₂ | 0.25 ppm | |
| 1-hour average | 0.25 ppm | |
| 24-hour average | 0.04 ppm | |
| CO | 20 ppm (23,000 $\mu\text{g}/\text{m}^3$) | |
| 1-hour average | 20 ppm (23,000 $\mu\text{g}/\text{m}^3$) | |
| 8-hour average | 9 ppm (10,000 $\mu\text{g}/\text{m}^3$) | |
| Lead | 1.5 $\mu\text{g}/\text{m}^3$ | |
| 30 day average | 1.5 $\mu\text{g}/\text{m}^3$ | |
| Rolling 3-month average | 0.15 $\mu\text{g}/\text{m}^3$ | |
| Quarterly average | 1.5 $\mu\text{g}/\text{m}^3$ | |

Source: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

(Ganddini, 2022a, Table 5)

Impact Analysis for Construction Emissions

Construction activities associated with the proposed Project would have the potential to generate air emissions, toxic air contaminant emissions, and odor impacts. Assumptions for the phasing, duration, and required equipment for the construction of the proposed Project were obtained from the Project Applicant. The construction activities for the proposed Project are anticipated to include: demolition of a 213,430 s.f. existing manufacturing building and approximately 305,150 s.f. of existing paving; site preparation to remove existing landscaping/parking areas; grading of approximately 13.49 acres; construction of a 295,499 s.f. manufacturing building with a 288,499 s.f. footprint; paving of a parking lot with 417 parking spaces; and application of architectural coatings. Proposed site preparation and grading activities would result in approximately 26,761 CY of cut, 26,761 CY of fill, and 21,407 CY of over-excavation. Earthwork would balance on site and no import/export of soils would be required. (Ganddini, 2022a, p. 30)



The Project's construction characteristics and construction equipment fleet assumptions used in the analysis are described in Appendix A. For the purposes of the construction emissions analysis, construction was expected to start no sooner than the beginning of December 2022 and be completed by mid-December 2023. However, the actual construction of the Project would be dependent on several factors, including timing of Project approvals, market conditions, and/or Project funding. As such, this analysis accounts for schedule modifications as Project plans evolve from conceptual planning to final mapping. If construction starts at a later date, it can be expected that Project emissions would be reduced because CalEEMod incorporates lower emission factors associated with construction equipment in future years due to improved emissions controls and fleet modernization through turnover.

A detailed discussion of the methodology used to calculate short-term construction emissions is provided in Initial Study/Scoping Document *Technical Appendix A*. In summary, construction-related emissions were estimated using the CalEEMod (Version 2020.4.0) software, which is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. The CalEEMod program uses the EMFAC2017 computer program to calculate the emission rates for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck operations. EMFAC2017 and OFFROAD2011 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. (Ganddini, 2022a, p. 30)

The calculated maximum daily emissions associated with Project construction are presented in Table 4-2, *Construction-Related Regional Pollutant Emissions*. As shown in Table 4-2, the Project's daily construction emissions of reactive organic gases (ROGs), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and particulate matter (PM₁₀ and PM_{2.5}) would not exceed SCAQMD regional criteria thresholds. The SCAQMD considers any project-specific criteria pollutant emissions that exceed applicable SCAQMD significance thresholds also to be cumulatively considerable. Phrased another way, if a project does not exceed the SCAQMD regional thresholds, then SCAQMD considers that project's air pollutant emissions to not be cumulatively considerable. Thus, because Project construction would not exceed the SCAQMD regional criteria significance thresholds, Project-related construction activities would not result in a cumulatively-considerable net increase of any criteria pollutant, including any pollutants for which the SCAB does not attain applicable federal or State ambient air quality standards. Construction-related regional air quality impacts would therefore be less than significant. (Ganddini, 2022a, p. 31)

Impact Analysis for Regional Operational Emissions

The on-going operation of the proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the Project-generated vehicle trips and through operational emissions from the on-going use of the proposed Project (Ganddini, 2022a, p. 37).



Table 4-2 Construction-Related Regional Pollutant Emissions

| Activity | | Pollutant Emissions (pounds/day) | | | | | |
|---|-----------------------|-------------------------------------|-----------|-----------|-----------------|------------------|-------------------|
| | | ROG | NOx | CO | SO ₂ | PM ₁₀ | PM _{2.5} |
| Demolition | On-Site ¹ | 2.64 | 25.72 | 20.59 | 0.04 | 5.07 | 1.73 |
| | Off-Site ² | 0.26 | 7.97 | 2.37 | 0.03 | 1.02 | 0.32 |
| | Subtotal | 2.90 | 33.69 | 22.96 | 0.07 | 6.09 | 2.05 |
| Site Preparation | On-Site ¹ | 3.17 | 33.08 | 19.70 | 0.04 | 9.28 | 5.42 |
| | Off-Site ² | 0.07 | 0.05 | 0.71 | 0.00 | 0.20 | 0.05 |
| | Subtotal | 3.24 | 33.13 | 20.41 | 0.04 | 9.48 | 5.48 |
| Grading | On-Site ¹ | 3.32 | 34.52 | 28.05 | 0.06 | 5.01 | 2.74 |
| | Off-Site ² | 0.07 | 0.05 | 0.72 | 0.00 | 0.22 | 0.06 |
| | Subtotal: | 3.39 | 34.56 | 28.78 | 0.06 | 5.24 | 2.80 |
| Building Construction | On-Site ¹ | 1.57 | 14.38 | 16.24 | 0.03 | 0.70 | 0.66 |
| | Off-Site ² | 0.97 | 4.56 | 10.55 | 0.04 | 3.47 | 0.96 |
| | Subtotal: | 2.55 | 18.94 | 26.80 | 0.07 | 4.17 | 1.62 |
| Paving | On-Site ¹ | 1.27 | 10.19 | 14.58 | 0.02 | 0.51 | 0.47 |
| | Off-Site ² | 0.05 | 0.04 | 0.54 | 0.00 | 0.17 | 0.05 |
| | Subtotal: | 1.32 | 10.23 | 15.13 | 0.02 | 0.68 | 0.51 |
| Architectural Coating | On-Site ¹ | 30.16 | 1.30 | 1.81 | 0.00 | 0.07 | 0.07 |
| | Off-Site ² | 0.17 | 0.12 | 1.81 | 0.00 | 0.56 | 0.15 |
| | Subtotal: | 30.33 | 1.43 | 3.62 | 0.01 | 0.63 | 0.22 |
| Total for overlapping phases ³ | | 34.19 | 30.60 | 45.55 | 0.10 | 5.48 | 2.35 |
| SCAQMD Thresholds | | 75 | 100 | 550 | 150 | 150 | 55 |
| Exceeds Thresholds? | | No | No | No | No | No | No |

Notes: CalEEMod Version 2020.4.0

- 1) On-site emissions from equipment operated on-site that is not operated on public roads. On-site demolition, site preparation, and grading PM₁₀ and PM_{2.5} emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.
- 2) Off-site emissions from equipment operated on public roads.
- 3) Construction, painting, and paving phases may overlap.
(Ganddini, 2022a, Table 6)

Methodology

The operations-related criteria air quality impacts created by the proposed Project have been analyzed through the use of the CalEEMod model. The operating emissions were based on the year 2023, which is the anticipated opening year per the Project’s Traffic Impact Analysis (“TIA”; Initial Study/Scoping Document *Technical Appendix F*). The operations daily emissions printouts from the CalEEMod model are provided in Appendix B within Initial Study/Scoping Document *Technical Appendix A*. The CalEEMod analyzes operational emissions from area sources, energy usage, and mobile sources, which are discussed below. (Ganddini, 2022a, p. 37)

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the proposed Project. The vehicle trips associated with the proposed Project have been analyzed by inputting the project-



generated vehicular trips (trip generation rate) from the TIA into the CalEEMod Model. The TIA found that the proposed Project would create approximately 995 vehicle trips per day (in terms of actual vehicles). The program then applies the emission factors for each trip which is provided by the EMFAC2017 model to determine the vehicular traffic pollutant emissions. (Ganddini, 2022a, p. 37)

The TIA found that the proposed industrial use would create 845 automobile round trips, 12 two-axle truck round trips, 11 three-axle truck round trips, and 127 four+-axle truck round trips per day (in terms of actual vehicles). The vehicle mix for the industrial project was changed in CalEEMod to match the TIA and the percentages in CalEEMod were changed to 84.9% autos and 15.1% trucks to match the overall vehicle percentages given in the TIA. Due to the proposed Project's location and proposed industrial land use, the average customer-based trip length was increased to 40 miles per SCAQMD recommendation, while all other trip lengths were based on the urban default values. (Ganddini, 2022a, p. 37)

Area Sources

Per guidance from the California Air Pollution Control Officers Association (CAPCOA), area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment. No changes were made to the default area source parameters. (Ganddini, 2022a, p. 37)

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters. (Ganddini, 2022a, p. 37)

Operational-Related Regional Air Quality Impacts

The worst-case summer or winter criteria pollutant emissions created from the proposed project's long-term operations have been calculated and are shown below in Table 4-3, *Regional Operational Pollutant Emissions*. As summarized in Table 4-3, Project-related operational emissions of ROG_s, NO_x, CO, SO₂, PM₁₀ and PM_{2.5} would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project's regional air quality emissions during long-term operations would be less than significant.

Conclusion

As indicated in Table 4-2 and Table 4-3, the Project would not exceed any of the SCAQMD regional thresholds during either construction or long-term operation. As such, the Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less-than-Significant Impact: Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and



people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and

Table 4-3 Regional Operational Pollutant Emissions

| Activity | Pollutant Emissions (pounds/day) | | | | | |
|-----------------------------|----------------------------------|-----------------|-------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO ₂ | PM ₁₀ | PM _{2.5} |
| Area Sources ¹ | 6.72 | 0.00 | 0.07 | 0.00 | 0.00 | 0.00 |
| Energy Usage ² | 0.09 | 0.82 | 0.69 | 0.00 | 0.06 | 0.06 |
| Mobile Sources ³ | 3.30 | 13.39 | 35.59 | 0.11 | 8.54 | 2.35 |
| Total Emissions | 10.12 | 14.21 | 36.35 | 0.11 | 8.61 | 2.41 |
| SCAQMD Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Exceeds Threshold? | No | No | No | No | No | No |

Notes: CalEEMod Version 2020.4.0; the higher of either summer or winter emissions.

- 1) Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
- 2) Energy usage consists of emissions from generation of electricity and on-site natural gas usage.
- 3) Mobile sources consist of emissions from vehicles and road dust.

(Ganddini, 2022a, Table 10)

daycare centers. The California Air Resources Board (CARB) has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The Project has the potential to expose sensitive receptors to substantial pollutant concentrations if Project construction or operational emissions were to exceed the SCAQMD Localized Significance Thresholds (LSTs). In addition, the Project has the potential to cause or contribute to CO “hot spots,” and also has the potential to expose sensitive receptors to substantial pollutant concentrations that could result in cancer risks and/or non-cancer hazards. Each is discussed below.

SCAQMD Localized Significance Thresholds Analysis

The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the NAAQS and CAAQS. Collectively, these are referred to as Localized Significance Thresholds (LSTs).

The SCAQMD established LSTs in response to the SCAQMD Governing Board’s Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The Look-up



Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NO_x, PM₁₀, and PM_{2.5} from a proposed project could result in a significant impact to the local air quality.

Table 4-1 (previously presented) shows the SCAQMD Air Quality Significance Thresholds for both construction and operations, which were used to evaluate the Project's potential localized air quality impacts. Refer to Section 2 of Initial Study/Scoping Document *Technical Appendix A* for a discussion of the methodology used to estimate the Project's localized air quality emissions.

LST Analysis for Construction Localized Emissions

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. The maximum number of acres disturbed in a day for the proposed Project would be 4 acres during grading. The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the LST Methodology. The emission thresholds were calculated based on the Southeast LA County source receptor area (SRA) 5 and a disturbance value of four acres per day. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors to the Project site are the multi-family residential uses adjacent to the west (that are currently under construction), the existing multi-family residential uses located approximately 335 feet (~102 meters) southeast, and the existing single-family residential uses located approximately 700 feet (~213 meters) northeast of the Project site; therefore, the SCAQMD Look-up Tables for 25 meters were used. Table 4-4, *Local Construction Emissions at the Nearest Receptors*, shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds. (Ganddini, 2022a, pp. 31-32)

As summarized in Table 4-4, localized emissions of NO_x, CO, and particulate matter (PM₁₀ and PM_{2.5}) would not exceed applicable SCAQMD LSTs during Project construction activities. Accordingly, Project construction would not expose any sensitive receptors to substantial concentrations of criteria pollutants, and impacts would be less than significant. (Ganddini, 2022a, p. 32)

LST Analysis for Operational Localized Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances, as well as the operation of vehicles on-site may have the potential to exceed the State and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the SCAB. The nearest sensitive receptors that may be impacted by the proposed Project are the multi-family residential uses adjacent to the west (that are currently under construction), the existing multi-family residential uses located approximately 335 feet (~102 meters) southeast, and the existing single-family residential uses located approximately 700 feet (~213 meters) northeast of the Project site. (Ganddini, 2022a, p. 39)

The local air quality emissions from on-site operations were analyzed according to the SCAQMD LST Methodology.



Table 4-4 Local Construction Emissions at the Nearest Receptors

| Activity | On-Site Pollutant Emissions (pounds/day) | | | |
|----------------------------------|--|-----------|------------------|-------------------|
| | NO _x | CO | PM ₁₀ | PM _{2.5} |
| Demolition | 25.72 | 20.59 | 5.07 | 1.73 |
| Site Preparation | 33.08 | 19.70 | 9.28 | 5.42 |
| Grading | 34.52 | 28.05 | 5.01 | 2.74 |
| Building Construction | 14.38 | 16.24 | 0.70 | 0.66 |
| Paving | 10.19 | 14.58 | 0.51 | 0.47 |
| Architectural Coating | 1.30 | 1.81 | 0.07 | 0.07 |
| SCAQMD Thresholds ^{1,2} | 153 | 1,274 | 12 | 6 |
| Exceeds Threshold? | No | No | No | No |

Notes: Calculated from CalEEMod and SCAQMD’s Mass Rate Look-up Tables for 4-acres at a distance of 25 m in SRA 5 Southeast Los Angeles County.

- 1) The nearest sensitive receptors are the single-family residential uses adjacent to the west (that are currently under construction) and the existing multi-family residential uses located approximately 335 feet (~102 meters) southeast and the existing single-family residential uses located approximately 700 feet (~213 meters) northeast of the project site; therefore, the 25-meter threshold was used.
- 2) The 4-acre threshold was interpolated from the 2-acre and 5-acre SCAQMD Mass Rate Look-up Table thresholds at 25 meters. Note: The project will disturb up to a maximum of 4 acres a day during grading (see Table 7 in Initial Study/Scoping Document *Technical Appendix A*).

(Ganddini, 2022a, Table 8)

Per SCAQMD staff, the 5-acre Look-up Table, which is the largest site available, can be used as a conservative screening analysis for on-site operational emissions to determine whether more-detailed dispersion modeling would be necessary. This approach is conservative as it assumes that all on-site emissions associated with a project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the site boundary. The proposed Project was analyzed based on the Southeast Los Angeles County SRA 5 and as the site is 13.49 acres, the screening thresholds for a five-acre Project site were conservatively used to evaluate Project impacts. (Ganddini, 2022a, p. 39)

Table 4-5, *Local Operational Emissions at the Nearest Receptors*, shows the on-site emissions from the CalEEMod model that includes natural gas usage, landscape maintenance equipment, and vehicles operating on-site and the calculated emissions thresholds. Per LST methodology, mobile emissions include only on-site sources which equate to approximately 10 percent of the Project-related new mobile sources. The data provided in Table 4-5 shows that the on-going operations of the proposed Project would not exceed the SCAQMD operational LSTs. Therefore, the on-going operations of the proposed Project would create a less-than-significant operations-related impact to local air quality due to on-site emissions. (Ganddini, 2022a, p. 39)



Table 4-5 Local Operational Emissions at the Nearest Receptors

| On-Site Emission Source | On-Site Pollutant Emissions (pounds/day) ¹ | | | |
|--------------------------------|---|-------|------------------|-------------------|
| | NO _x | CO | PM ₁₀ | PM _{2.5} |
| Area Sources ² | 0.00 | 0.07 | 0.00 | 0.00 |
| Energy Usage ³ | 0.82 | 0.69 | 0.06 | 0.06 |
| Vehicle Emissions ⁴ | 1.34 | 3.56 | 0.85 | 0.23 |
| Total Emissions | 2.16 | 4.32 | 0.92 | 0.30 |
| SCAQMD Thresholds ⁵ | 172 | 1,480 | 4 | 2 |
| Exceeds Threshold? | No | No | No | No |

Notes:

- 1) Source: Calculated from CalEEMod and SCAQMD’s Mass Rate Look-up Tables for 5 acres in SRA 5 Southeast Los Angeles County.
- 2) Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
- 3) Energy usage consists of emissions from on-site natural gas usage.
- 4) On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust.
- 5) The nearest sensitive receptors are the single-family residential uses adjacent to the west (that are currently under construction) and the existing multi-family residential uses located approximately 335 feet (~102 meters) southeast and the existing single-family residential uses located approximately 700 feet (~213 meters) northeast of the project site; therefore, the 25-meter threshold was used.
(Ganddini, 2022a. Table 10)

Carbon Monoxide “Hot Spot” Analysis

An adverse CO concentration, known as a “hot spot,” would occur if an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the 1993 SCAQMD CEQA Air Quality Handbook, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment.

The analysis prepared for CO attainment in the SCAB by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the SCAB. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the SCAB are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest



intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour. (Ganddini, 2022a, p. 38)

The Project's TIA (Initial Study/Scoping Document *Technical Appendix F*) shows that the proposed Project would generate a maximum of approximately 995 daily vehicle trips. The intersection with the highest traffic volume is located at Whittier Boulevard and Whittier Boulevard Frontage Road and has an Existing Plus Ambient Growth Plus Project Plus Cumulative - Alternative with Mar Vista Street Extension AM peak hour volume of 1,428 vehicles. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. Therefore, as the intersection volume falls far short of 100,000 vehicles per day, no CO "hot spot" modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed Project. Accordingly, Project impacts due to CO "hot spots" would be less than significant. (Ganddini, 2022a, pp. 38-39)

Health Risk Assessment

In order to determine if the proposed Project may have a significant impact related to hazardous air pollutants (HAP), the *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (Diesel Analysis Guidelines), prepared by SCAQMD and dated August 2003, recommends that if a proposed project is anticipated to create hazardous air pollutants through stationary sources or regular operations of diesel trucks on the project site, then the proximity of the nearest receptors to the source of the hazardous air pollutants and the toxicity of the hazardous air pollutants should be analyzed through a comprehensive facility-wide health risk assessment (HRA). (Ganddini, 2022a, p. 27)

An HRA was conducted for the proposed Project, the results of which are included in Section 3 of Initial Study/Scoping Document *Technical Appendix A*. Please refer to Section 3 of Initial Study/Scoping Document *Technical Appendix A* for a discussion of emissions inventory development and a description of the receptor network considered in the analysis. A summary of the Diesel Particulate Matter (DPM) emissions factors utilized in the analysis are provided in Table 12 of Initial Study/Scoping Document *Technical Appendix A*; Table 13 of *Technical Appendix A* provides a summary of the emission configurations used in the analysis; and Table 14 of *Technical Appendix A* provides a summary of the general modeling assumptions used in the modeling software.

The assessment of air quality and health risk impacts from pollutant emissions from this Project applied the United States Environmental Protection Agency (EPA) AERMOD Model, which is the air dispersion model accepted by the SCAQMD for performing air quality impact analyses. AERMOD predicts pollutant concentrations from point, area, volume, line, and flare sources with variable emissions in terrain from flat to complex with the inclusion of building downwash effects from buildings on pollutant dispersion. It captures the essential atmospheric physical processes and provides reasonable estimates over a wide range of meteorological conditions and modeling scenarios. AERMOD View Version 10.2.1, EPA version No. 21112, was utilized for the analysis. (Ganddini, 2022a, p. 47)



Health risks from diesel particulate matter are twofold. First, diesel particulate matter is a carcinogen according to the State of California. Second, long-term chronic exposure to diesel particulate matter can cause health effects to the respiratory system. (Ganddini, 2022a, p. 47)

According to the SCAQMD CEQA Handbook, any project that has the potential to expose the public to toxic air contaminants in excess of the following thresholds would be considered to have a significant air quality impact (Ganddini, 2022a, p. 27):

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the proposed project would result in a Hazard Index increase of 1 or greater.

Provided below is an analysis of the Project's potential to expose sensitive receptors to cancer and non-cancer health risks.

Cancer Risks

The Project would generate toxic air contaminant emissions from diesel truck emissions created by the ongoing operations of the proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of revised Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology. (Ganddini, 2022a, p. 45)

According to the SCAQMD's MATES-V study, the Project area has an estimated multi-pathway cancer risk of 467 in one million and an inhalation cancer risk of 435 in one million. In comparison the average multi-pathway cancer risk for the SCAB portion of Los Angeles County is 497 in one million and the inhalation cancer risk is 462 in a million. The cancer risk in the local area largely is due to the proximity to the Interstate 605 Freeway. (Ganddini, 2022a, p. 45)

Cancer risk calculations were modeled in accordance with the *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*, released by the Office of Environmental Health Hazard Assessment (OEHHA) in February 2015 and formally adopted in March 2015. (Ganddini, 2022a, p. 47)

The model run results are shown in Appendix C to Initial Study/Scoping Document *Technical Appendix A*. Figure 5 in *Technical Appendix A* illustrates the sensitive receptor locations considered in the analysis. Table 4-6, *Carcinogenic Risks and Non-Carcinogenic 3rd Trimester Exposure Scenario (0.25-Year)*, shows the cancer risk for the unborn child during the 3rd trimester. Table 4-7, *Carcinogenic Risks and Non-Carcinogenic Infant Exposure Scenario (2-Year)*, shows the cancer risk to infants (0-2 years). Table 4-8, *Carcinogenic Risks and Non-Carcinogenic Child Exposure Scenario (2-16 Years)*, shows the cancer risk to children ages 2 to 16 years. Table 4-9, *Carcinogenic Risks and Non-Carcinogenic Hazards Adult Exposure Scenario (16-30 Years)*, shows the cancer risk as that child becomes an adult (years 16-30). (Ganddini, 2022a, p. 48)



Table 4-6 Carcinogenic Risks and Non-Carcinogenic 3rd Trimester Exposure Scenario (0.25-Year)

| Receptor ID (a) | Maximum Concentration | | Weight Fraction (d) | Contaminant (c) | Carcinogenic Hazards | | Noncarcinogenic Hazards | | |
|--------------------|-----------------------|----------------|------------------------|--------------------|---------------------------|---------------------------|-------------------------|---------------------------|--------------|
| | (ug/m3) (b) | (mg/m3) (c) | | | CPF (mg/kg/day) (f) | RISK (per million) (g) | REL (ug/m3) (h) | RfD (mg/kg/day) (i) | Index (j) |
| 1 | 0.00115 | 1.2E-06 | 1.00E+00 | DPM | 1.1E-00 | 0.02 | 5.0E-00 | 1.4E-03 | 0.0002 |
| 2 | 0.00113 | 1.1E-06 | 1.00E+00 | DPM | 1.1E-00 | 0.02 | 5.0E-00 | 1.4E-03 | 0.0002 |
| 3 | 0.00107 | 1.1E-06 | 1.00E+00 | DPM | 1.1E-00 | 0.01 | 5.0E-00 | 1.4E-03 | 0.0002 |
| 4 | 0.00084 | 8.4E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.01 | 5.0E-00 | 1.4E-03 | 0.0002 |
| 5 | 0.00107 | 1.1E-06 | 1.00E+00 | DPM | 1.1E-00 | 0.01 | 5.0E-00 | 1.4E-03 | 0.0002 |
| 6 | 0.00101 | 1.0E-06 | 1.00E+00 | DPM | 1.1E-00 | 0.01 | 5.0E-00 | 1.4E-03 | 0.0002 |
| 7 | 0.00074 | 7.4E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.01 | 5.0E-00 | 1.4E-03 | 0.0001 |
| bike trail_8 | 0.00129 | 1.3E-06 | 1.00E+00 | DPM | 1.1E-00 | 0.02 | 5.0E-00 | 1.4E-03 | 0.0003 |
| 9 | 0.00063 | 6.3E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.01 | 5.0E-00 | 1.4E-03 | 0.0001 |

(Ganddini, 2022a, Table 15)

Table 4-7 Carcinogenic Risks and Non-Carcinogenic Infant Exposure Scenario (2-Year)

| Receptor ID (a) | Maximum Concentration | | Weight Fraction (d) | Contaminant (e) | Carcinogenic Hazards | | Noncarcinogenic Hazards | | |
|--------------------|-----------------------|----------------|------------------------|--------------------|---------------------------|---------------------------|-------------------------|---------------------------|--------------|
| | (ug/m3) (b) | (mg/m3) (c) | | | CPF (mg/kg/day) (f) | RISK (per million) (g) | REL (ug/m3) (h) | RfD (mg/kg/day) (i) | Index (j) |
| 1 | 0.00109 | 1.1E-06 | 1.00E+00 | DPM | 1.1E+00 | 0.36 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 2 | 0.00107 | 1.1E-06 | 1.00E+00 | DPM | 1.1E+00 | 0.35 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 3 | 0.00102 | 1.0E-06 | 1.00E+00 | DPM | 1.1E+00 | 0.34 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 4 | 0.0008 | 8.0E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.26 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 5 | 0.00096 | 9.6E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.32 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 6 | 0.00085 | 8.5E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.28 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 7 | 0.00063 | 6.3E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.21 | 5.0E+00 | 1.4E-03 | 0.0001 |
| bike trail_8 | 0.00115 | 1.2E-06 | 1.00E+00 | DPM | 1.1E+00 | 0.38 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 9 | 0.00053 | 1.9E-04 | 1.00E+00 | DPM | 1.1E+00 | 0.17 | 5.0E+00 | 1.4E-03 | 0.0001 |

(Ganddini, 2022a, Table 16)

Table 4-8 Carcinogenic Risks and Non-Carcinogenic Child Exposure Scenario (2-16 Years)

| Receptor ID (a) | Maximum Concentration | | Weight Fraction (d) | Contaminant (e) | Carcinogenic Hazards | | Noncarcinogenic Hazards | | |
|--------------------|-----------------------|----------------|------------------------|--------------------|---------------------------|---------------------------|-------------------------|---------------------------|--------------|
| | (ug/m3) (b) | (mg/m3) (c) | | | CPF (mg/kg/day) (f) | RISK (per million) (g) | REL (ug/m3) (h) | RfD (mg/kg/day) (i) | Index (j) |
| 1 | 0.00097 | 9.7E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.35 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 2 | 0.00095 | 9.5E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.34 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 3 | 0.00091 | 9.1E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.33 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 4 | 0.00071 | 7.1E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.26 | 5.0E+00 | 1.4E-03 | 0.0001 |
| 5 | 0.00082 | 8.2E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.30 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 6 | 0.00069 | 6.9E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.25 | 5.0E+00 | 1.4E-03 | 0.0001 |
| 7 | 0.00052 | 5.2E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.19 | 5.0E+00 | 1.4E-03 | 0.0001 |
| bike trail_8 | 0.00097 | 9.7E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.35 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 9 | 0.00044 | 4.4E-07 | 1.00E+00 | DPM | 1.1E-00 | 0.16 | 5.0E+00 | 1.4E-03 | 0.0001 |

(Ganddini, 2022a, Table 17)



Table 4-9 Carcinogenic Risks and Non-Carcinogenic Hazards Adult Exposure Scenario (16-30 Years)

| Receptor ID (a) | Maximum Concentration | | Weight Fraction (d) | Contaminant (e) | Carcinogenic Hazards | | Noncarcinogenic Hazards | | |
|-----------------|-----------------------|-------------|---------------------|-----------------|----------------------|------------------------|-------------------------|---------------------|-----------|
| | (ug/m3) (b) | (mg/m3) (c) | | | CPF (mg/kg/day) (f) | RISK (per million) (g) | REL (ug/m3) (h) | RfD (mg/kg/day) (i) | Index (j) |
| | 1 | 0.00091 | | | 9.1E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.04 |
| 2 | 0.00089 | 8.9E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.04 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 3 | 0.00085 | 8.5E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.03 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 4 | 0.00066 | 6.6E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.03 | 5.0E+00 | 1.4E-03 | 0.0001 |
| 5 | 0.00073 | 7.3E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.03 | 5.0E+00 | 1.4E-03 | 0.0001 |
| 6 | 0.00056 | 5.6E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.02 | 5.0E+00 | 1.4E-03 | 0.0001 |
| 7 | 0.00039 | 3.9E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.02 | 5.0E+00 | 1.4E-03 | 0.0001 |
| bike trail_8 | 0.00088 | 8.8E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.04 | 5.0E+00 | 1.4E-03 | 0.0002 |
| 9 | 0.00039 | 3.9E-07 | 1.00E+00 | DPM | 1.1E+00 | 0.02 | 5.0E+00 | 1.4E-03 | 0.0001 |

(Ganddini, 2022a, Table 18)

The highest cancer risk corresponds to infant cancer risk 0-2 years (see Table 4-7), and is at receptor bike trail_8 (located east of the Project site), with a maximum risk of 0.38 in one million, followed by receptor 1 (located west of the Project site) at 0.36 in a million. The maximum 3rd trimester (0.25-year) cancer risk is at receptors 1, 2 (located west of the Project site), and bike trail_8, with a maximum cancer risk of 0.02 in a million. The highest child (2-16 years) cancer risk is at receptors 1 and bike trail_8, with a maximum risk of 0.35 in one million. The highest adult (16-30 years) cancer risk is at receptors 1, 2 and bike trail_8, with a maximum risk of 0.04 in one million. Accordingly, no children, infants, or adults would be exposed to cancer risks in excess of 10 in a million, indicating that Project impacts due to cancer risk would be less than significant. (Ganddini, 2022a, p. 48)

The assessment of cumulative cancer-related health risk to sensitive receptors within the Project vicinity is based on the following most-conservative scenario: an unborn child in its 3rd trimester is potentially exposed to DPM emissions (via exposure of the mother) during the opening year. That child is born opening year and then remains at home for the entire first two years of life. From age 2 to 16, the child remains at home 100 percent of the time. From age 16 to 30, the child continues to live at home, growing into an adult that spends 73 percent of its time at home and lives there until age 30. (Ganddini, 2022a, p. 48)

Based on the above, ultra-conservative assumptions, the 30.25-year, cumulative carcinogenic health risk (3rd trimester [-0.25 to 0 years] + infant [0-2 years] + child [2-16 years] + adult [16-30 years]) to an individual born during the opening year of the Project, and located in the Project vicinity for the entire 30-year duration, is a maximum of 0.78 in a million at receptor location bike trail_8, followed by 0.76 in a million at receptor location 1, as shown in Table 4-10, *Cumulative Carcinogenic Risk 30.25-Year Exposure Scenario*. Therefore, the ongoing operations of the proposed Project would result in a less-than-significant impact due to the cancer risk from diesel emissions created by the proposed Project, as the residential cancer risk would not exceed 10 in a million. (Ganddini, 2022a, p. 48)



Table 4-10 Cumulative Carcinogenic Risk 30.25-Year Exposure Scenario

| Receptor ID | Cumulative RISK (per million) |
|--------------|-------------------------------|
| 1 | 0.76 |
| 2 | 0.75 |
| 3 | 0.71 |
| 4 | 0.56 |
| 5 | 0.66 |
| 6 | 0.57 |
| 7 | 0.42 |
| bike trail_8 | 0.78 |
| 9 | 0.36 |

(Ganddini, 2022a, Table 19)

Non-Cancer Risks

The relationship for non-cancer health effects is given by the equation:

$$HIDPM = CDPM/RELDPM$$

Where:

- HIDPM = Hazard Index; an expression of the potential for non-cancer health effects.
- CDPM = Annual average diesel particulate matter concentration in $\mu\text{g}/\text{m}^3$.
- RELDPM = Reference Exposure Level (REL) for diesel particulate matter (DPM); the diesel particulate matter concentration at which no adverse health effects are anticipated. (Ganddini, 2022a, p. 49)

The non-carcinogenic hazards to adult, child, and infant receptors were previously shown in Table 4-6 through Table 4-9 (refer to column j). The RELDPM is $5 \mu\text{g}/\text{m}^3$. The Office of Environmental Health Hazard Assessment as protective for the respiratory system has established this concentration. Using the maximum DPM concentration from years 2023-2053, the resulting Hazard Index is: (Ganddini, 2022a, p. 49)

$$HIDPM = 0.00129/5 = 0.0003$$

The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the proposed Project would result in a less-than-significant impact due to the non-cancer risk from diesel emissions created by the proposed Project. (Ganddini, 2022a, p. 49)

Conclusion

As demonstrated in the preceding analysis, the proposed Project would not: exceed any of the SCAQMD LSTs during construction or operation; cause or substantially contribute to a CO “hot spot”; or expose sensitive receptors to cancer risks exceeding 10 in one million or non-cancer risks exceeding a Hazard Index of 1.0. As such, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Therefore, no further analysis of this topic is required.



d) *Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less-than-Significant Impact: The Project could produce odors during proposed construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the Project site and therefore should not reach an objectionable level at the nearest sensitive receptors. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant. (Ganddini, 2022a, pp. 32-33)

During long-term operation, the proposed Project would operate as a warehouse, which is a land use not typically associated with objectionable odors. Potential sources that may emit odors during the on-going operations of the proposed Project would include odor emissions from the intermittent diesel delivery truck emissions and trash storage areas. The temporary storage of refuse associated with the proposed Project’s long-term operational use could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City’s solid waste regulations, thereby precluding any significant odor impact. Furthermore, the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance during long-term operation. As such, and because the Project would be required to comply with SCAQMD’s Rule 402, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people and impacts would be less than significant. (Ganddini, 2022a, pp. 39-40)

Based on the foregoing analysis, Project impacts due to odors associated with construction and operational activities would be less than significant. Therefore, no further analysis of this topic is required.

4.1.4 Biological Resources

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| <p>a) <i>Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</i></p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| <i>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeded the use of native wildlife nursery sites?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less-than-Significant Impact. Under existing conditions, the Project site is currently developed with three vacant, attached structures totaling 213,430 s.f. The surrounding area is also fully developed with urban uses. Because the site is fully developed under existing conditions, no candidate, sensitive, or special status species have the potential to occur on the site. Vegetation on the site is minimal and is limited to ornamental vegetation. Because no candidate, sensitive, or special status species occur on the site, there is no potential for redevelopment of the site as proposed to result in substantial adverse effects to sensitive biological resources recognized by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Services (USFWS).

Notwithstanding, the Project site contains trees in the southwest corner of the site and around the existing buildings, while a number of trees, including the Paradox Hybrid Walnut Tree, are located in close proximity to the Project site along the Whittier Boulevard frontage road. The on-site and nearby trees could be used by nesting avian species that are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Commission (CFGF Sections 3503.5 to 3513). Pursuant to the MBTA and CFGF, take of a protected



species individual, their egg(s), or their nest is prohibited. In compliance with the MBTA and CFGC, the City of Whittier would condition the Project to require that if construction activities occur during the nesting season (February 1 to August 31), pre-construction surveys shall be conducted to determine the presence or absence of nesting birds on or adjacent to the Project site prior to the commencement of construction activities. If active bird nests are present, the standard condition of approval requires avoidance of the nests until it can be determined the nest is no longer active or that the juveniles from the occupied nests are capable of surviving independently of the nest. Mandatory compliance with the City's standard condition of approval would ensure that impacts to nesting birds are remain below a level of significance.

Based on the foregoing analysis, Project impacts to sensitive or special-status species would be less than significant. Therefore, no further analysis of this topic is required.

b) *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

No Impact. The Project site is currently developed with warehouse buildings and an associated parking lot and is in a highly urbanized and industrialized area in the City of Whittier. The entire area of the site is paved or covered with the existing buildings. Vegetation on the site is minimal and is limited to ornamental landscaping. Additionally, there are no natural drainages or riparian habitats on the Project site under existing conditions. Accordingly, the Project would not result in any impacts to riparian habitat or other sensitive natural plant communities, and no impact would occur. Therefore, no further analysis of this topic is required.

c) *Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. The Project site is currently developed with three attached industrial buildings and an associated parking lot in a highly urbanized and industrialized area. The entire area of the site is paved or covered with the existing buildings, and there are no wetlands or jurisdictional resources on the Project site under existing conditions. An existing man-made open concrete drainage channel is located along the west side of the property which drains to an existing storm drain located at the southwest corner of the Project site (Thienes, 2022a, p. 2). Due to the concrete-lined and man-made nature of the drainage channel, the channel does not comprise a wetland or jurisdictional resource under the jurisdiction of the CDFW, USFWS, or the United States Army Corps of Engineers (ACOE). Accordingly, the Project would not have a substantial adverse effect on any State- or federally-protected wetlands through direct removal, filling, hydrological interruption, or other means, and no impact would occur. Therefore, no further analysis of this topic is required.

d) *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Less-than-Significant Impact. The Project site is currently developed with three attached industrial buildings and an associated parking lot in a highly urbanized and industrialized area. As such, the Project site does not provide for any wildlife movement corridors under existing conditions. Areas surrounding the Project site also



are fully developed with urban uses under existing conditions, and also do not serve as a wildlife movement corridor under existing conditions. Additionally, there are no native wildlife nursery sites within the Project vicinity. Although the Project site and surrounding areas have the potential to provide habitat for nesting birds, the analysis of Threshold 4.1.4.a) demonstrates that implementation of the City's standard condition of approval for nesting birds would preclude potential impacts to the nesting birds. Accordingly, with mandatory compliance with the City's standard condition of approval for nesting birds, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

e) *Would the Project conflict with any local polices or ordinances protecting biological resources, such as tree preservation policy or ordinance?*

No Impact. The Project site is fully developed and does not contain any biological resources including trees that are protected by a tree preservation policy or ordinance. In accordance with City of Whittier Municipal Code Chapter 12.24 (Complete Streets Program), the City of Whittier in 2016 adopted a "Parkway Tree Manual" (City of Whittier, 2016) However, the Parkway Tree Manual only regulates trees within the public right-of-way. The Paradox Hybrid Walnut Tree is located in the median of the Whittier Boulevard frontage road right-of-way to the east, between Penn and Mar Vista Streets. The Paradox Hybrid Walnut Tree was designated in 1959 as State Historical Landmark No. 681, and is on the Local Register of Historic Resources (Landmark No. 25) (OHP, n.d.; City of Whittier, n.d., p. 25). The Project would not involve any improvements within the public right-of-way that would have the potential to impact trees regulated by the City's Parkway Tree Manual, including but not limited to the Paradox Hybrid Walnut Tree. There are no other local policies or ordinances protecting biological resources and that are applicable to the proposed Project or the Project site. Accordingly, the Project has no potential to conflict with any local polices or ordinances protecting biological resources, such as tree preservation policy or ordinance, and no impact would occur. Therefore, no further analysis of this topic is required.

f) *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation plan, or other approved local, or state habitat conservation plan?*

No Impact. There are no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan applicable to the Project area. Although Los Angeles County designates areas as "Significant Ecological Areas (SEAs)," which "are areas in which planning should be sensitive to resources and maintenance of biological functions as well," the Project site is not located within or near any SEAs according to GIS mapping information available from Los Angeles County. The nearest SEA is associated with the Puente Hills, located approximately 1.5 miles northeast of the Project site; thus, the Project is not subject to the County's requirements related to SEAs. (LA County, n.d.) Accordingly, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan, no impact would occur. Therefore, no further analysis of this topic is required.



4.1.5 Cultural Resources

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|-------------------------------------|--|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) <i>Disturb any human remains, including those interred outside of formal cemeteries?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) *Would the Project cause a substantial adverse change in the significant of historical resources pursuant to §15064.5?*

Potentially Significant Impact. Under existing conditions, the 13.49-acre property is developed with a manufacturing facility with a two-story office building that was built in the 1950's. Due to the age of the existing buildings, there is a potential that the existing buildings on site may be eligible for listing by the National Register of Historic Places (NRHP) and/or the California Register of Historical Resources (CRHR) based on the criteria listed in California Public Resources Code Section 5024.1 and California Code of Regulations Section 15064.5. Accordingly, a formal historical resources assessment shall be prepared for the Project, the results of which shall be discussed in the Project's EIR to ascertain potential impacts to on-site historical resources.

b) *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

Potentially Significant Impact. Because the site is fully developed with a manufacturing facility and two-story office building that was built in the 1950's, it is unlikely that archaeological resources are located on the Project site. The site's ground surface was previously disturbed by excavation for the construction of the existing buildings and associated improvements, and the construction of the proposed building would entail excavation and grading to a similar depth and expanse. However, because the Project would require extensive amounts of soil remediation due to the historic uses at the site that could extend below the depths of historic excavation, there is a potential that previously undiscovered archeological resources may be encountered during Project construction activities. If archeological resources are unearthed during Project excavation that meet the CEQA Guidelines § 15064.5 definition of a significant resource, potentially significant impacts to archaeological resources could occur. The Project's potential to result in impacts to subsurface archaeological resources shall be evaluated and disclosed in the required EIR.

c) *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

No Impact. Because the site is fully developed with a manufacturing facility and two-story office building that was built in the 1950's and that completely disturbed the ground surface, no known human remains are present on site. The Project site is not known to have ever been used as a cemetery and the possibility of uncovering



human remains during site grading activities is remote due to the previous development at the site. However, in the unlikely event that human remains are encountered, compliance with California Health and Safety Code Section 7050.5 would be required. Mandatory compliance with these provisions of California state law would ensure that impacts to human remains, if unearthed during construction activities, would be appropriately treated and ensure that potential impacts are less than significant. Potential impacts associated with potential inadvertent discoveries of human remains would be reduced to less than significant through mandatory compliance with California Health and Safety Code Section 7050.5. Therefore, no further analysis of this topic is required.

4.1.6 Energy

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| a) <i>Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

An *Air Quality, Global Climate Change, HRA, and Energy Impact Analysis* was prepared for the Project by Ganddini Group to quantify anticipated energy usage associated with the construction and operation of the proposed Project, to determine if the usage amounts are efficient, typical, or wasteful for the land use type, and to identify any potential methods of avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. This report is entitled, *Air Quality, Global Climate Change, HRA, and Energy Impact Analysis*, is dated February 11, 2022, and is included as *Appendix A* to this Initial Study/Scoping Document.

a) *Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less-than-Significant Impact: Refer to Initial Study/Scoping Document *Technical Appendix A* for an overview of energy consumption in California, along with a discussion of regulations related to energy. The analysis in *Technical Appendix A* is based on information from the CalEEMod 2020.4.0 Daily and Annual Outputs contained in Appendix B and D to Initial Study/Scoping Document *Technical Appendix A*, which also were used to evaluate the Project’s potential impacts to air quality and due to greenhouse gas emissions. (Ganddini, 2022a, p. 95)

The proposed Project would result in the consumption of energy resources during both construction and long-term operation. Each is discussed below.

Construction-Related Energy Demands

The construction schedule is anticipated to occur between the beginning of December 2022 and mid-December 2023 and be completed in one phase. Project-related construction activities would represent a “single-event”



demand and would not require on-going or permanent commitment of energy resources. The Project's construction process would consume electricity and fuel, and are discussed in detail below.

Construction Equipment Electricity Usage Estimates

Electrical service would be provided to the Project by Southern California Edison (SCE). The power cost from on-site electricity consumption during construction of the proposed Project was used to estimate construction-related energy consumption. Based on the 2017 National Construction Estimator, the typical power cost per 1,000 square feet of building construction per month is estimated to be \$2.32. The Project plans to develop the site with a 295,499 s.f. industrial use. Based on Table 25 of Initial Study/Scoping Document *Technical Appendix A*, the total power cost of the on-site electricity usage during the construction of the proposed project is estimated to be approximately \$8,549.20. As shown in Table 14 of Initial Study/Scoping Document *Technical Appendix A*, the total electricity usage from Project construction related activities is estimated to be approximately 65,763 kWh. (Ganddini, 2022a, p. 95)

Construction Equipment Fuel Estimates

The Project's construction phase would consume electricity and fossil fuels as a single energy demand; that is, once construction is completed their use would cease. CARB's 2017 Emissions Factors Tables show that on average, aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal. Table 26 of *Technical Appendix A* shows the results of the analysis of construction equipment. As presented in Table 26 of *Technical Appendix A*, Project construction activities would consume an estimated 43,289 gallons of diesel fuel. Project construction would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Ganddini, 2022a, p. 96)

Construction Worker Fuel Estimates

It is assumed that construction worker trips are from light duty autos (LDA), light duty truck 1 (LDT1), and light duty truck 2 (LDT2) at a mix of 50 percent/25 percent/25 percent, respectively, along area roadways. With respect to estimated Vehicle Miles Traveled (VMT), the construction worker trips would generate an estimated 669,071 VMT. Data regarding Project-related construction worker trips were based on CalEEMod 2020.4.0 model defaults. Vehicle fuel efficiencies for construction workers were estimated using CARB's 2021 EMFAC model. An aggregate fuel efficiency of 26.38 miles per gallon (mpg) was used to calculate vehicle miles traveled for construction worker trips. Table 27 of *Technical Appendix A* shows that an estimated 25,363 gallons of fuel would be consumed for construction worker trips. (Ganddini, 2022a, p. 96)

Construction Vendor/Hauling Fuel Estimates

Tables 28 and 29 of Initial Study/Scoping Document *Technical Appendix A* show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 150,639 VMT. Data regarding project related construction worker trips were based on CalEEMod 2020.4.0 model defaults. (Ganddini, 2022a, p. 96)

For the architectural coatings it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles. Therefore, vendors delivering construction material or hauling debris from the site during grading would use medium to heavy duty vehicles with an average fuel consumption of 7.59 mpg for medium heavy-duty trucks and 5.87 for heavy heavy-duty trucks. Tables 28 and



29 of Initial Study/Scoping Document *Technical Appendix A* show that an estimated 23,410 gallons of fuel would be consumed for vendor and hauling trips. (Ganddini, 2022a, p. 96)

Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately 12.5-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful or unnecessary consumption of fuel. (Ganddini, 2022a, p. 97)

The Project would utilize construction contractors which practice compliance with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Ganddini, 2022a, p. 97)

Additionally, as required by California Code of Regulations Title 13, Motor Vehicles, section 2449(d)(3) Idling, idling times of construction vehicles are limited to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Ganddini, 2022a, p. 97)

Based on the foregoing analysis, Project construction-related energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Therefore, no further analysis of this topic is required.

Operational-Related Energy Demands

Energy consumption in support of or related to project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities). Each is discussed below. (Ganddini, 2022a, p. 97)

Transportation Fuel Consumption

Using the CalEEMod output used to evaluate the Project's air quality and greenhouse gas emissions impacts, it is assumed that an average trip for autos and light trucks was assumed to be 6.9 miles and 3- and 4-axle trucks were assumed to travel an average of 40 miles. In order to present a worst-case scenario, it was assumed that vehicles would operate 365 days per year. Table 30 of Initial Study/Scoping Document *Technical Appendix A* shows the estimated annual fuel consumption for all classes of vehicles from autos to heavy-heavy trucks. (Ganddini, 2022a, p. 97)

The proposed Project would generate 995 vehicle trips per day (actual vehicles). The vehicle fleet mix was used from the CalEEMod output. Table 30 of Initial Study/Scoping Document *Technical Appendix A* shows



that an estimated 393,935 gallons of fuel would be consumed per year for the operation of the proposed Project. (Ganddini, 2022a, p. 97)

Trip generation and VMT generated by the proposed Project are consistent with other similar industrial uses of similar scale and configuration as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (20th Edition, 2017). That is, the proposed Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Furthermore, the State of California consumed approximately 4.2 billion gallons of diesel and 15.1 billion gallons of gasoline in 2015. Accordingly, the increase in fuel consumption from the proposed Project is insignificant in comparison to the State's demand. Therefore, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Ganddini, 2022a, pp. 97-98)

Facility Energy Demands (Electricity and Natural Gas)

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity (provided by SCE) and natural gas (provided by Southern California Gas Company). The annual natural gas and electricity demands were provided per the CalEEMod output from the Project's air quality and greenhouse gas analyses and are provided in Table 31 of Initial Study/Scoping Document *Technical Appendix A*. (Ganddini, 2022a, p. 98)

As shown in Table 31 of Initial Study/Scoping Document *Technical Appendix A*, the estimated electricity demand for the proposed Project is approximately 3,039,390 kWh per year. In 2020, the non-residential sector of the County of Los Angeles consumed approximately 42,737 million kWh of electricity. In addition, the estimated natural gas consumption for the proposed Project is approximately 3,743,240 kBtu per year. In 2020, the non-residential sector of the County of Los Angeles consumed approximately 1,699 million therms of gas. Therefore, the increase in both electricity and natural gas demand from the proposed Project is insignificant compared to the County's 2019 non-residential sector demand. (Ganddini, 2022a, p. 98)

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in" energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). (Ganddini, 2022a, p. 98)

Furthermore, the proposed Project energy demands in total would be comparable to other non-residential projects of similar scale and configuration. Therefore, the Project facilities' energy demands and energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Ganddini, 2022a, p. 98)

Operational-Related Energy Demands

As demonstrated by the preceding analysis, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation, and impacts would be less than significant. Therefore, no further analysis of this topic is required.



b) *Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

Less-than-Significant Impact: Regarding federal transportation regulations, the Project site is located in an already developed area. Access to and from the Project site is from existing roads, including Whittier Boulevard and I-605. Because these roads are already in place, the Project would not interfere with, or otherwise obstruct intermodal plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the Project area. (Ganddini, 2022a, p. 98)

Regarding the State Energy Plan and compliance with Title 24 CCR energy efficiency standards, the Project Applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by SCE and SoCalGas (Ganddini, 2022a, p. 98).

Regarding Pavley (AB 1493) regulations, an individual project does not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources (Ganddini, 2022a, p. 98).

Regarding the State's Renewable Energy Portfolio Standards, the Project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CALGreen Standards 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 (Ganddini, 2022a, pp. 98-99).

Regarding CARB, the Project would be consistent with the applicable goals of the CARB Scoping Plan and would result in a less than significant impact (Ganddini, 2022a, p. 99).

In conclusion, as supported by the preceding analysis, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant. Therefore, no further analysis of this topic is required.



4.1.7 Geology and Soils

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|-------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| <i>a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</i> | | | | |
| <i>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>ii) Strong seismic ground shaking?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>iii) Seismic-related ground failure, including liquefaction?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>iv) Landslides?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>b) Result in substantial soil erosion or the loss of topsoil?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>d) Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>e) Have soils incapable of adequately supporting the use septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

A site-specific geotechnical investigation was conducted on the Project site by NorCal Engineering. This report, is entitled, “Geotechnical Engineering Investigation, Proposed Industrial Warehouse Development, 12352 Whittier Boulevard, Whittier, California,” is dated April 2, 2021, and is included as Initial Study/Scoping Document *Technical Appendix B* (NorCal Engineering, 2021)

- a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**



- ii) *Strong seismic ground shaking?*
 - iii) *Seismic-related ground failure, including liquefaction?*
 - iv) *Landslides?*
-

The Project's potential impacts related to earthquake hazards are discussed below.

Earthquake Fault Rupture

No Impact. Ground rupture is the visible offset of the ground surface when an earthquake rupture along a fault affects the Earth's surface. Southern California, including the City of Whittier, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone. According to the California Department of Conservation (CDC) Earthquake Zones of Required Investigation and CDC Fault Activity Map, the Project site is not within an Alquist-Priolo earthquake fault zone or other earthquake fault zone, and the nearest fault zone, the Elsinore Fault Zone, Whittier Section, is located approximately 1.4 miles northeast of the Project site (CDC, 2015; CDC, 2019; NorCal Engineering, 2021, p. 4). Fault rupture would not occur on the Project site since no active faults traverse on-site. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, and no impacts would occur. Therefore, no further analysis of this topic is required.

Strong Seismic Shaking

Less-than-Significant Impact. According to the City of Whittier Envision General Plan, the City of Whittier, including the Project site, is within a seismically active region of Southern California; therefore, projects developed pursuant to General Plan policies, such as the Project, would expose people and structures to ground shaking hazards associated with earthquakes. Any ground shaking that occurs on-site is anticipated to be similar throughout the area and would not be considered unusual or unique. Additionally, the Project would be required to be designed in accordance with the requirements of the 2019 edition of the California Building Code (CBC) Standard ASCE/SEI 7-16. The CBC has been specifically tailored for California earthquake conditions and provides standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures. The redevelopment of the Project site with one manufacturing building with a total building area of 295,499 s.f. would expose people and the structure to ground shaking; however, the Project is not anticipated to result in unusual or unique risks as compared to other development projects in the City. Moreover, the construction of the proposed building would comply with all requisite State and local seismic safety standards. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

Seismic-Related Ground Failure/Liquefaction

Less-than-Significant Impact. Seismic-related ground failure includes, but is not limited to, liquefaction. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to fluids when subject to a high-intensity seismic event. Liquefaction occurs when three general conditions coexist: 1)



shallow groundwater, 2) low-density non-cohesive (granular) soils, and 3) high-intensity ground motion. Based upon information in the California Division of Mines and Geology "Seismic Hazard Zone Map - Whittier Quadrangle", dated March 25, 1999, the Project site is not situated in an area of historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions to indicate a potential for permanent ground displacement. As such, the design of the proposed development in conformance with the latest Building Code provisions for earthquake design is expected to provide mitigation of ground shaking hazards, including liquefaction, that are typical to Southern California. (NorCal Engineering, 2021, p. 5) Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

Seismically Induced Landslides

No Impact. Seismic events can cause the soils within a slope to become unstable and slip, causing a landslide. According to the CDC Earthquake Zones of Required Investigation Map, the Project site is not within a landslide zone (CDC, 2019). Further, no sizable slopes are located on or adjacent to the Project site, and no substantial slopes are proposed as part of the Project. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically-induced landslides, and no impacts would occur. Therefore, no further analysis of this topic is required.

b) *Would the Project result in substantial soil erosion or the loss of topsoil?*

Less-than-Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the Project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not employed.

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

Construction-Related Impacts

Proposed grading and construction activities at the Project site would expose underlying soils and disturb surficial soils. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The Los Angeles County Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would identify a combination of erosion control and sediment control measure (i.e., Best Management Practices [BMPs]) to reduce or eliminate sediment discharge to surface water from storm water and non-stormwater source discharges during construction.



In addition, proposed construction activities would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be following that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be tracked out of the site by more than 25 feet. In addition, proposed construction activities would be required to comply with Chapter 8.36, *Stormwater and Runoff Pollution Control*, of the City's Municipal Code, which regulates discharges to protect and improve water quality of receiving waters and requires the Project Applicant to obtain a NPDES construction general permit from the Storm Water Resources Control Board (SWRCB). Compliance with the NPDES construction general permit requires the Project Applicant to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), which in turn requires the preparation and implementation of an erosion control plan. With mandatory compliance to the requirements to be included in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels. Therefore, no further analysis of this topic is required.

Operational-Related Impacts

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system. The Project would be required to comply with the requirements outlined in the Project's Low Impact Development (LID) report, pursuant to the requirements of Chapter 8.36 of the City's Municipal Code. The Project's preliminary LID is included as *Technical Appendix C2* to this Initial Study/Scoping Document. The LID includes structural and non-structural best management practices (BMPs) to ensure water quality standards are upheld, including standards related to erosion and sedimentation. The BMPs identified in the Project's LID would reduce the Project's potential operational impacts concerning soil erosion or loss of topsoil. Accordingly, long-term operation of the proposed Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less-than-Significant Impact. As discussed under Threshold 4.1.7.a.iii), the Project site is not situated in an area of historic occurrence of liquefaction, or an area where local geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacement. Therefore, the design of the proposed development in conformance with the latest Building Code provisions for earthquake design is expected to provide mitigation of ground shaking hazards, including liquefaction, that are typical to Southern California. (NorCal Engineering, 2021, p. 5)

As discussed under Threshold 4.1.7.a.iv), the Project site is not within a landslide zone. Additionally, the Project site and surrounding area is fully developed and does not have substantial natural or manufactured slopes. No substantial slopes are proposed as part of the Project. Accordingly, the Project would not be located



on a geologic unit or soil that is unstable that would result in on- or off-site landslide, and no impact would occur.

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move downslope on a liquefied soil layer. Lateral spreading is a regional event. For lateral spreading to occur, the liquefiable soil zone must be laterally continuous, unconstrained laterally, and free to move along the sloping ground. The Project site's potential for lateral spreading is considered low due to the site's relatively flat topography, distance from slopes, and low potential for liquefaction, as discussed above. Accordingly, the Project would not be located on a geologic unit or soil that would result in lateral spreading. No impacts would occur.

According to the Project-specific Geotechnical Investigation (*Technical Appendix B*), the on-site soils are calculated experience shrinkage less than 10 percent to 15 percent due to excavation and re-compaction. Subsidence is anticipated to be 0.2 ft due to earthwork operations. The Project would be required to comply with City Municipal Code Chapter 12.28, *Excavations and Grade Changes*, which regulates and controls "the design, construction, quality of materials, the location and maintenance of buildings and structures, and the grading and filling of land within the city." With mandatory compliance with City Municipal Code Chapter 12.28 and the recommendations of the Project-specific Geotechnical Investigation, impacts due subsidence would be less than significant. (NorCal Engineering, 2021, p. 9)

In addition, mandatory compliance with the site-specific recommendations of the Project-specific Geotechnical Investigation (*Technical Appendix B*) would ensure that potential hazards associated with collapse remain below a level of significance.

Based on the foregoing analysis, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant. Therefore, no further analysis of this topic is required.

d) *Would the Project be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less-than-Significant Impact. Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking or swelling. As determined by the Project's site-specific Geotechnical Investigation (*Technical Appendix B*), expansive soils were encountered and special attention should be given to the Project design and maintenance. The Geotechnical Investigation includes *Expansive Soil Guidelines* that specifies measures to be undertaken to address the potential for expansive soils on site. The Project would be conditioned by the City to implement the site-specific recommendations of the Geotechnical Investigation. With mandatory compliance with the recommendations of the Geotechnical Investigation, impacts due to expansive soils would be reduced to less-than-significant levels. Therefore, no further analysis of this topic is required.



e) *Would the project have soils incapable of adequately supporting the use septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. Sewer service to the Project site would be provided by the City of Whittier. The Project does not propose the use of septic tanks or alternative wastewater disposal systems, as all wastewater generated by the Project would be collected via the City’s sanitary sewer system and conveyed to the Los Coyotes Wastewater Treatment Plant for treatment. Accordingly, no impact would occur, and no further analysis of this topic is required.

f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Potentially Significant Impact. The Project site’s ground surface was previously disturbed by excavation for construction of the existing buildings on site and associated improvements. According to the Project’s Geotechnical Report prepared by NorCal Engineering (NorCal) dated April 2, 2021 and included as *Technical Appendix B* to this Initial Study/Scoping Document, fill soils exist on the site at depths ranging from one foot to six feet, below which are natural soils (NorCal Engineering, 2021, p. 3). The construction of the proposed building would entail excavation and grading to a similar depth and expanse. However, the Project would require extensive amounts of soil remediation due to the historic uses at the site, which could extend below the depths of historic excavation. As such, there is a potential that previously-undiscovered paleontological resources may be encountered during Project construction activities, which represents a potentially significant impact. The Project’s potential to result in impacts to previously-undiscovered paleontological resources during Project construction activities shall be evaluated and disclosed in the forthcoming EIR.

4.1.8 Greenhouse Gas Emissions

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|---------------------------------------|---|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| a) <i>Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The analysis in this section is based on the *Air Quality, Global Climate Change, HRA, and Energy Impact Analysis* report prepared by Ganddini Group and dated February 11, 2022. This report is included as *Technical Appendix A* to this Initial Study/Scoping Document, and its findings are incorporated into the analysis presented herein. Refer to Section 4 of *Technical Appendix A* for a description of greenhouse gases (GHGs), a summary of standards and regulations related to GHGs, and for a description of the methodology used to estimate the Project’s GHG emissions.



a) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Potentially Significant Impact: While estimated Project-related GHG emissions can be calculated, the direct impacts of such emissions on global climate change (GCC) and global warming cannot be determined on the basis of available science because GCC is a global phenomenon and not limited to a specific locale such as the Project site and its immediate vicinity. Furthermore, there is no evidence that would indicate that the emissions from a project the size of the proposed Project could directly or indirectly affect the global climate. Because global climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would not result in a direct impact to global climate change; rather, Project-related impacts to global climate change only could be potentially significant on a cumulatively-considerable basis. Therefore, the analysis below focuses on the Project's potential to contribute to global climate change in a cumulatively-considerable way (Ganddini, 2022a, p. 86).

The City of Whittier does not have an adopted threshold of significance for GHG emissions. According to the *Final Statement of Reasons for Regulatory Action* (December 2009), which was prepared by the California Natural Resources Agency (CRNA) in support of amendments to the CEQA Guidelines addressing GHG emissions, lead agencies have the option to determine their methodology for quantifying GHG emissions. The SCAQMD uses a numeric significance threshold of 10,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year for industrial stationary source projects (Ganddini, 2022a, pp. 79-80) and 3,000 MTCO₂e per year for other land use type stationary sources based on a 90 percent emission capture rate methodology. Although the Project is industrial and although the Project's emissions will primarily be area-source, energy-source, and mobile-source emissions and not stationary source emissions, the most conservative approach is to use a significance threshold 3,000 MTCO₂e per year.

As more fully documented in Section 4 of Initial Study/Scoping Document *Technical Appendix A*, the Project would result in the emissions of GHGs during both construction and operation. Construction emissions were calculated by CalEEMod. Operational emissions were calculated for area sources (e.g., landscape equipment, architectural coatings), energy usage (electricity and natural gas), mobile sources (passenger vehicles and truck traffic), solid waste, and water consumption. (Ganddini, 2022a, p. 81)

The Project's GHG emissions are summarized in Table 4-11, *Project-Related Greenhouse Gas Emissions*. As shown on Table 4-11, the Project would emit approximately 3,066.08 MTCO₂e per year which would not exceed the SCAQMD's industrial source threshold of 10,000 MTCO₂e per year but would exceed the SCAQMD's 3,000 MTCO₂e per year threshold for other stationary sources. As such, further analysis of this topic is required in the EIR to determine if impacts are significant.



Table 4-11 Project-Related Greenhouse Gas Emissions

| Category | Greenhouse Gas Emissions (Metric Tons/Year) | | | | | |
|--|---|------------------------|-----------------|-----------------|------------------|--------------------|
| | Bio-CO ₂ | NonBio-CO ₂ | CO ₂ | CH ₄ | N ₂ O | MTCO _{2e} |
| Area Sources ¹ | 0.00 | 0.02 | 0.02 | 0.00 | 0.00 | 0.02 |
| Energy Usage ² | 0.00 | 826.04 | 826.04 | 0.06 | 0.01 | 830.43 |
| Mobile Sources ³ | 0.00 | 1,724.63 | 1,724.63 | 0.10 | 0.15 | 1,771.73 |
| Waste ⁴ | 74.20 | 0.00 | 74.20 | 4.39 | 0.00 | 183.84 |
| Water ⁵ | 21.63 | 157.43 | 179.05 | 2.23 | 0.05 | 251.03 |
| Construction ⁶ | 0.00 | 28.57 | 28.57 | 0.00 | 0.00 | 29.05 |
| Total Emissions | 95.83 | 2,736.69 | 2,832.52 | 6.78 | 0.21 | 3,066.08 |
| SCAQMD Screening Threshold for Industrial Uses | | | | | | 10,000 |
| Exceeds Threshold? | | | | | | No |

Notes:

Source: CalEEMod Version 2020.4.0 for Opening Year 2023.

- (1) Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
- (2) Energy usage consist of GHG emissions from electricity and natural gas usage.
- (3) Mobile sources consist of GHG emissions from vehicles.
- (4) Solid waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills.
- (5) Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
- (6) Construction GHG emissions CO_{2e} based on a 30-year amortization rate. (Ganddini, 2022a, Table 21)

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

Less-than-Significant Impact: The Project would be required to comply with a number of regulations, policies, plans, and policy goals that would reduce GHG emissions, including Title 24 California Building Standards Code (CBSC), Senate Bill 32 (SB 32), and CARB’s Scoping Plan, which are regulations particularly applicable to the Project. For more information on these regulations as well as other State-wide plans, policies, and regulations associated with GHG emissions that are not applicable to the Project, refer to Section 4 of Initial Study/Scoping Document *Technical Appendix A*.

Title 24/CBSP Compliance

The CBSC includes the California Energy Code, or Title 24, Part 6 of the California Code of Regulations, also titled “The Energy Efficiency Standards for Residential and Nonresidential Buildings.” The California Energy Code was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. The standards are updated approximately every three years to improve energy efficiency by allowing incorporating new energy efficiency technologies and methods (the most recent update took effect on January 1, 2020). The Project would be required to comply with all applicable provisions of the CBSC in effect at the time of Project construction. As such, the Project’s energy demands would be minimized through design features and operational programs that, in aggregate, would ensure that Project energy efficiencies would comply with – or exceed – incumbent CBSC energy efficiency requirements, thereby minimizing GHG emissions produced from energy consumption. The Project has no potential to be inconsistent with the mandatory regulations of the CBSC or Title 24.



SB 32/AB 32 Compliance

In 2006, the California State Legislature adopted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable Statewide emission cap which was phased in starting in 2012. In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend Health and Safety Code Division 25.5 and establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of State climate policies reach into disadvantaged communities. (Ganddini, 2022a, p. 69)

As indicated under the analysis of Threshold 4.1.8.a), the Project's emissions would be below the SCAQMD threshold of 10,000 MTCO_{2e} per year for industrial uses. As such, the Project's emissions also comply with the goals of AB 32. Additionally, as the Project meets the current interim emissions targets/thresholds established by the SCAQMD, the Project also would be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by SB 32. Furthermore, the majority of the post 2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Project would be required to comply with these regulations as they come into effect. Accordingly, the Project would not conflict with the provisions of AB 32 or SB 32. (Ganddini, 2022a, p. 83)

CARB Scoping Plan Compliance

The 2017 Scoping Plan, released by CARB in November 2017, incorporates, coordinates, and leverages many existing and ongoing efforts and identifies new policies and actions to accomplish the State's climate goals, and includes a description of a suite of specific actions to meet the State's 2030 GHG limit. The actions identified in the 2017 Scoping Plan to reduce overall GHG emissions in California identify new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets. These strategies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources. The Project is consistent with the applicable strategies and would result in a less-than-significant impact. (Ganddini, 2022a, pp. 83-85)

At a level of 3,066.08 MTCO_{2e} per year, the Project's GHG emissions would not exceed the SCAQMD threshold of 10,000 MTCO_{2e} per year for industrial uses and would be in compliance with the reduction goals of the CARB Scoping Plan, AB 32, and SB 32. Furthermore, the Project would comply with applicable Green Building Standards and City of Whittier's policies regarding sustainability (as dictated by the City's General Plan). Accordingly, the Project would not conflict with the CARB Scoping Plan. (Ganddini, 2022a, p. 84)

Conclusion

Based on the preceding analysis, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, and impacts would be less than significant. Therefore, no further analysis of this topic is required.



4.1.9 Hazards and Hazardous Materials

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|-------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) <i>Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) <i>Be located on a site which is included on a list of hazardous materials sites which complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) <i>For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) <i>Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) <i>Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

This section is primarily based on the *Phase I Environmental Site Assessment 12352 Whittier Boulevard, Whittier, California 90602* (Phase I ESA) (HMC, 2019), prepared by Hazard Management Consulting (HMC), dated December 12, 2019, and included as *Technical Appendix D1* to this Initial Study/Scoping Document. The analysis in this section also is based on the Project’s *Soil and Soil Vapor Investigation* (Soil/Vapor Investigation), also prepared by HMC, dated April 13, 2021, and included as *Technical Appendix D2* to this Initial Study/Scoping Document (HMC, 2021).



a) *Would the Project create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?*

b) *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Potentially Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The analysis below addresses the potential for hazardous materials effects associated with the existing conditions of the site, Project construction activities, and long-term operations.

Existing Site Conditions

The Project site was used for agriculture since at least 1928 until the 1950s when it was developed with the original single industrial structure used by the company Ecko Products. The two additional industrial structures were attached to the original structure in the 1960s, which are the existing three attached structures currently on the Project site. The site was used to manufacture bedframes since the 1950s. In 2009, manufacturing operations ceased and the site was used for storage and distribution of bedframes. (HMC, 2019, pp. 1, 20)

An REC is defined by the American Society for Testing Materials (ASTM) as, “the presence or likely presence of any hazardous substances or petroleum product in, on, or at the property: 1) due to a release to the environment; 2) under conditions indicative of a release to the environment, or 3) under conditions that pose a material threat of a future release to the environment.” Based on the results of the Project’s Phase I ESA and Soil/Vapor Investigation, the Project site is associated with Recognized Environmental Conditions (RECs) as follows (HMC, 2019, p. 22):

- The Project site has an open Leaking Underground Storage Tank (LUST) case with the RWQCB due to releases from former Underground Storage Tanks (USTs). While groundwater has been closed by the RWQCB, soil remains an open issue.
- The Project site has a history of industrial use including the use of chlorinated solvents since the 1950s that have not been investigated to date.
- Evidence exists that the plumes of chlorinated solvents from the Omega Chemical facility and Sunrise Properties extends below the Project site.
- There is a significant chance that a vapor intrusion condition may exist due to past releases on site as well as the impacted groundwater from off-site facilities.

Based on the foregoing analysis, because the Project site contains RECs, the Project has the potential to create a significant hazard to the public or the environment during construction activities. This issue shall be evaluated in the forthcoming EIR, and mitigation measures shall be identified as necessary and appropriate to reduce potential impacts associated with existing site contamination to below a level of significance.



Project Demolition and Construction

Demolition

While not an REC, the existing buildings on site were reported to have been built in the 1950's through the 1960's during a time when asbestos was commonly found in construction materials. Suspect asbestos containing materials were observed at the Project site including drywall, joint compound, ceiling tiles, vinyl floor tile, acoustic ceilings, and mastic. As such, there is a potential for the Project to create a significant hazard to the public or the environment during the demolition phase of construction.

General Construction Hazardous Waste

Heavy equipment (e.g., dozers, excavators, tractor) would operate on the subject property during construction of the Project. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. Also, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the Environmental Protection Agency (EPA), US Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; California Department of Toxic Substances Control (DTSC), SCAQMD, RWQCB, and the California Department of Industrial Relations Division of Occupational Safety and Health, better known as Cal/OSHA. With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Project Operations

The Project entails redevelopment of the Project site with one manufacturing building with a total building area of 295,499 s.f. The future building occupant(s) for the Project is not yet identified. However, the Project is designed to house warehouse and manufacturing occupants and it is possible that hazardous materials could be used during the future building user's daily operations. State and federal Community-Right-to-Know laws allow public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that requires businesses to plan and prepare for possible chemical emergencies. The City of Whittier follows Los Angeles County's Hazardous Waste Management Plan, which provides standards for disposal, handling, processing, storage, and treatment of local hazardous waste. Additionally, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic ft. of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of hazardous material. The HMBEP intends to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.



If businesses that use or store hazardous materials occupy the Project, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis, the Project has the potential to create a significant hazard to the public or the environment during construction activities due to existing site contamination and due to the likely presence of asbestos-containing materials within the existing buildings on site. These impacts shall be evaluated in the forthcoming EIR, and mitigation measures shall be identified as appropriate to reduce potential impacts to below a level of significance.

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. There are no schools located within 0.25-mile of the Project site. The nearest school to the Project site is St. Mary’s Catholic School, located approximately 0.28-mile northeast of the Project site. Additionally, according to the City’s Zoning Map, there are no properties within 0.25-mile of the Project site that are zoned for proposed school facilities. Therefore, implementation of the Project would have no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school, and no impact would occur. Therefore, no further analysis of this topic is required.

d) *Would the Project be located on a site which is included on a list of hazardous materials sites complied 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. Based on a review of Cortese List data resources available from the California Environmental Protection Agency (CalEPA), the Project site is not identified as a hazardous materials site by DTSC’s EnviroStor database, the State Water Board’s GeoTracker database for leaking underground storage tanks (LUST), the list of solid waste disposal sites identified by the State Water Board, the list of “active” cease and desist orders (CDO) or cleanup and abatement orders (CAO) compiled by the State Water Board, or DTSC’s list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA, n.d.). Accordingly, the Project would not result in a significant hazard to the public or the environment due to the Project being included on a list of hazardous materials sites complied pursuant to Government Code Section 65962, and no impact would occur. Therefore, no further analysis of this topic is required.



e) *For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

Less-than-Significant Impact. The Project site is not within an airport land use plan or within two miles of a public use airport. The nearest public use airport is the San Gabriel Valley Airport in El Monte, located approximately 7.3 miles northwest of the Project site. Therefore, the proposed Project would not result in a safety or noise hazard for people working at the Project site, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

f) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less-than-Significant Impact. The adopted emergency response plan in the Project area is the City of Whittier Emergency Operations Plan (EOP). The purpose of the EOP is to address the City's planned response and recovery to emergencies associated with natural disasters and technological incidents. The redevelopment of the Project site is not anticipated to impair implementation of or physically interfere with the City's EOP or any emergency evacuation plans as the Project site does not serve as an emergency evacuation route or emergency operation center. SR-72 and I-605 serve as evacuation corridors within the Project vicinity, with Whittier Boulevard serving as the primary local evacuation route in the area. The Project is located on the Whittier Boulevard frontage road, and has no potential to affect Whittier Boulevard during either construction or operation. (City of Whittier, n.d.)

Additionally, the Project was subject to the City's development review and permitting process and future building permits associated with the Project would be required to incorporate all applicable design and safety standards and regulations in the California Fire Code and the City of Whittier Municipal Code Chapter 15.12, *Fire Code*. The incorporation of applicable design and safety standards and regulations would ensure that the Project's development does not interfere with the provision of local emergency services.

Based on the foregoing, implementation of the Project would not significantly impair the implementation of or physically interfere with the City's Emergency Response Plan or any other emergency response plans. A less-than-significant impact would occur. Therefore, no further analysis of this topic is required.

g) *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

No Impact. The Project site is fully developed and within a completely urbanized area of the City of Whittier that is void of any wildland areas. Additionally, according to the California Department of Forestry and Fire Protection (CalFire), the Project site is not within a fire hazard severity zone (FHSZ). As such, the Project would not expose people or structure to a significant risk involving wildland fires, and no impact would occur. Therefore, no further analysis of this topic is required.



4.1.10 Hydrology and Water Quality

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) <i>Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:</i> | | | | |
| i. <i>Result in substantial erosion or siltation on- or off-site;</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. <i>Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. <i>Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. <i>impede or redirect flood flows?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) <i>In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) <i>Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

In order to evaluate the Project’s potential impacts to hydrology and water quality, two Project-specific technical reports were prepared by Thienes Engineering, Inc. (herein, “Thienes”). The first report, which addresses proposed drainage conditions, is entitled, “Preliminary Hydrology Calculations for Whittier Boulevard Business Park,” is dated October 25, 2021, and is included as *Technical Appendix C1* to this Initial Study/Scoping Document (Thienes, 2021). The second report, which addresses water quality, is entitled, “Low Impact Development (LID) for Whittier Boulevard Business Park,” is dated March 28, 2022, and is included as *Technical Appendix C2* to this Initial Study/Scoping Document (Thienes, 2022a).



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.

The California Porter-Cologne Water Quality Control Act (Section 1300 [“Water Quality”] et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act [CWA]) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The Water Quality Control Plan for the Los Angeles Region (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (a) designates beneficial uses for surface and ground waters; (b) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy; and (c) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. (LARWQCB, 2014)

The CWA requires all states to conduct water quality assessments to their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site is located in the San Gabriel River Watershed. Receiving waters for the Project site’s drainage include the following: Coyote Creek, North Fork; Coyote Creek; San Gabriel River (Reach 1); San Gabriel River Estuary; San Pedro Bay Near/Off Shore Zones; and the Pacific Ocean. Table 4-12, *Section 303(d) Impairments for Receiving Waters*, provides a summary of the receiving waters for the Project site and their associated Section 303(d) impairments. (Thienes, 2022a, pp. 7-8)

A specific provision of the CWA applicable to the Project is CWA Section 402, which authorizes the NPDES permit program that covers point source pollution discharging to a water body. The NPDES program also requires operators of construction site one acre or larger to prepare a storm water pollution prevention plan (SWPPP) and obtain authorization to discharge storm water under an NPDES construction storm water permit. A discussion of the Project’s potential to result in water quality impacts during construction and long-term operation is presented below.

Table 4-12 Section 303(d) Impairments for Receiving Waters

| Receiving Waters | Section 303(d) Impairments |
|------------------------------------|---|
| Coyote Creek, North Fork | Indicator Bacteria, Selenium |
| Coyote Creek | Dissolved Copper, Indicator Bacteria, Iron, Malathion, pH, Toxicity |
| San Gabriel River (Reach 1) | Temperature (water) |
| San Gabriel River Estuary | Copper, Dioxin, Indicator Bacteria, Nickel, Dissolved Oxygen |
| San Pedro Bay Near/Off Shore Zones | Chlordane, PCBs (Polychlorinated biphenyls), Total DDT, Toxicity |
| Pacific Ocean | None |

(Thienes, 2022a, pp. 7-8)

Temporary Construction Activities

Construction of the Project would involve demolition, clearing, grading, paving, utility installation, building construction, architectural coatings, and landscaping activities. Construction activities would result in the



generation of potential water quality pollution such as silt, debris, chemicals, paints, solvents, and other chemicals with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the LARWQCB and Chapter 8.36, *Stormwater and Runoff Pollution Control*, of the City's Municipal Code, the Project Applicant would be required to obtain a NPDES Municipal Storm Water Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the LARWQCB's Basin Plan. Compliance with the NPDES Permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities, including grading. The SWPPP would specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, water quality impacts associated with construction activities would be less than significant.

Post-Development Water Quality Impacts

The Project would entail redevelopment of the Project site with storm water pollutants of a manufacturing building having up to 295,499 s.f. of floor space along with associated parking and landscaping areas. According to the Project's LID report, pollutants of concern associated with the proposed Project include suspended solids; total phosphorus; total nitrogen; total Kjeldahl nitrogen; cadmium, total; chromium, total; copper, total; lead, total; zinc, total; heavy metals; and trash/debris (Thienes, 2022a, pp. 7-8).

Pursuant to Chapter 8.36 of the City's Municipal Code, the Project Applicant would be required to implement the Project's LID (Initial Study/Scoping Document *Technical Appendix C2*) to demonstrate compliance with the Los Angeles County Municipal Separate Storm Sewer System (MS4) NPDES Permit and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The LID is a site-specific post-construction water quality management program designed to address the pollutants of concern associated with development projects via BMPs, implementation of which ensures the on-going protection of the watershed basin. As identified in *Technical Appendix C2*, the Project is designed to include source controls (e.g., storm drain message and signage; outdoor trash storage/waste handling requirements; outdoor/loading dock requirements; and landscape irrigation practices) and low impact development requirements (e.g., biofiltration, BMP maintenance, drain inserts, and parking lot design). Specifically, stormwater from the northwestern and southern portion of the proposed building and from approximately the north half and the south half of the Project site would flow to the proposed catch basins on the western side of the site, go through the proposed 18-inch storm drain, then discharge to the existing catch basin and storm drain at the southwest corner of the Project site. A portion of the proposed southwestern truck yard would sheet flow off of the Project site. The western portion of the Project site that is not being improved by the proposed Project would continue to drain southerly as it does under existing conditions. (Thienes, 2021, n.p.) Before any of these areas to be developed as part of the Project discharge offsite, the first flush flows would be diverted to underground chambers for detention purposes. The detained stormwater would slowly pump up to at-grade WetlandMOD biofiltration devices for treatment over a maximum period of 96 hours.



The WetlandMOD biofiltration devices would utilize plants and soil media from Attachment H to the MS4 Permit to biotreat pollutants. Drain inserts would be utilized in catch basins for pretreatment. (Thienes, 2022a, p. 2)

Adherence to statutory requirements and long-term maintenance of BMPs would ensure that water quality and waste discharge requirements are not violated. Accordingly, long-term operation of the Project would not result in substantial impacts to water quality, water quality standards, or waste discharge requirements associated with long-term operational activities, and impacts would be less than significant.

Conclusion

Based on the foregoing analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

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?

Less-than-Significant Impact. Potable Water service to the proposed Project would be provided by the City of Whittier. The City's water supply sources include groundwater pumped from the Main Basin and Central Basin, and recycled water supplies. The Project site occurs within the Central Basin, while the City obtains a majority of its water from the Main Basin, which is located to the north of the City's water service area. (City of Whittier, 2021b, p. 6-1 and Figure 4)

The Project would entail redevelopment of the Project site, which would include demolition of the existing 213,430 s.f. buildings on site and constructing a new 295,499 s.f. manufacturing building. Although the Project would be indirectly supplied by groundwater via the City's water system, in June 2021 the City of Whittier adopted its "2020 Urban Water Management Plan (UWMP)." The City's UWMP forecasts water demands and supplies under normal, single-dry, and multiple-dry year conditions; assesses supply reliability; and describes methods of reducing demands under potential water shortages. The City's UWMP is based, in part, on the General Plan land use designations of lands within the City's service area (City of Whittier, 2021b, p. 3-7). The proposed Project is consistent with the site's existing General Plan and Specific Plan land use designations, and also is consistent with the site's underlying zoning classifications. As such, the proposed Project is fully accounted for by the UWMP. Because the UWMP demonstrates that the City would have sufficient water supplies, including groundwater, to meet water demands within its district through 2045, it can therefore be concluded that the Project's demand for potable water would not result in the depletion of groundwater supplies. As such, Project impacts to groundwater supplies would be less than significant.

With respect to groundwater recharge, the Project site only provides for nominal areas of groundwater recharge under existing conditions, with recharge limited to landscaped areas on site. With redevelopment of the Project site as proposed, the site would continue to consist primarily of impervious surfaces, with exception of proposed landscape areas. With implementation of the Project, runoff generated on site would continue to be conveyed towards the south, and the total amount of runoff leaving the Project site would be similar to existing conditions. Runoff generated on the Project site ultimately would be conveyed to natural drainage channels



that allow for infiltration of water into the groundwater table, also similar to existing conditions. Accordingly, Project impacts to groundwater recharge would be less than significant.

Based on the foregoing analysis, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

-
- c) *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i) *result in substantial erosion or siltation on- or off-site;*
 - ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;*
 - iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
 - iv) *impede or redirect flood flows?*
-

Erosion, Siltation, and Water Quality

Less-than-Significant Impact. Please refer to the analysis of Thresholds 4.1.7.b) and 4.1.10.a). As indicated therein, the Project would be subject to the City's NPDES permit during construction. The Los Angeles County Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a Project-specific SWPPP. The Project also would be subject to SCAQMD Rule 403, as well as Chapter 8.36, *Stormwater and Runoff Pollution Control*, of the City's Municipal Code, which regulates discharges to protect and improve water quality of receiving waters. With mandatory compliance to the requirements to be included in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, the potential for erosion, sedimentation, and water quality impacts during Project construction would be reduced to less-than-significant levels.

As also indicated under the analysis of Thresholds 4.1.7.b) and 4.1.10.a), following construction, erosion and sedimentation hazards on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system. The Project would be required to comply with the requirements outlined in the Project's LID report, pursuant to the requirements of Chapter 8.36 of the City's Municipal Code. The BMPs identified in the Project's LID would reduce the Project's potential operational impacts concerning erosion, sedimentation, and adverse effects to water quality. Accordingly, long-term operation of the proposed Project would not result in substantial soil erosion, sedimentation, or the degradation of water quality, and impacts would be less than significant.

On- or Off-Site Flooding and Stormwater Drainage Capacity

Less-than-Significant-Impact. Under existing conditions, peak runoff from the Project site during 50-year storm events is estimated at approximately 30.1 cubic feet per second (cfs). With development of the Project as proposed, peak runoff on the Project site during 50-year storm events would increase to approximately 41.05



cfs. (Thienes, 2021) Although peak runoff would increase, the proposed Project was reviewed by the Los Angeles County Flood Control District (LACFCD), which determined that the proposed Project would not exceed the capacity of existing downstream storm facilities. Because the existing drainage facilities are adequately sized to convey Project runoff, the Project also would not result in potential flood hazards downstream. Additionally, although some flooding may occur within the parking areas during peak storm events, the Project's drainage system has been designed to ensure that the proposed building is not subject to flood hazards. Accordingly, impacts would be less than significant.

Impediments to or Redirection of Flood Flows

No Impact. According to mapping information available from the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) program, the Project site is located within Flood Zone X, which includes “[a]reas determined to be outside the 0.2% annual chance floodplain” (FEMA, 2008). Accordingly, the Project has no potential to impede or redirect flood flows, and no impact would occur.

Conclusion

Based on the preceding analysis, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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 stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. Impacts would be less than significant. Therefore, no further analysis of this topic is required.

d) *Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

No Impact. According to mapping information available from FEMA's FIRM program, the Project site is located within Flood Zone X, which includes “[a]reas determined to be outside the 0.2% annual chance floodplain” (FEMA, 2008). Accordingly, the Project would not be subject to inundation due to flood hazards, and no impact would occur.

The Project site is located approximately 15.7 miles northeast of the Pacific Ocean. As such, the Project site is not subject to inundation due to tsunamis, and no impact would occur.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. There are no enclosed or semi-enclosed bodies of water in proximity to the Project site. Accordingly, the Project would not be subject to inundation from seiches, and no impacts would occur.

Based on the foregoing analysis, the Project would not risk release of pollutants due to Project inundation from floods, tsunamis, or seiches, and no impact would occur. Therefore, no further analysis of this topic is required.



e) *Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less-than-Significant Impact. The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in “high-” and “medium”-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. As noted above, the City of Whittier would provide water service to the proposed Project, and obtains a majority of its water resources from groundwater extraction within the Main Basin and the Central Basin. The California Department of Water Resources (DWR) currently categorizes the Central Basin and Main Basin as “very low” priority (City of Whittier, 2021b, p. 4-27). Further, Section 10720.8(a) of the SGMA exempts adjudicated basins from the SGMA’s requirement to prepare a GSP; the Main and Central Basins have been adjudicated. Therefore, preparation of Groundwater Sustainability Plans is not required and the Main and Central Basins are not subject to the requirements of the SGMA. As such, the Project has no potential to conflict with a sustainable groundwater management plan, and no impact would occur.

The California Porter-Cologne Water Quality Control Act (§ 13000 (“Water Quality”) et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the LARWQCB. Water quality information for the San Gabriel River watershed is contained in the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan).

The Basin Plan describes actions by the LARWQCB and others that are necessary to achieve and maintain the water quality standards. The LARWQCB regulates waste discharges to minimize and control their effects on the quality of the region’s groundwater and surface water. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The LARWQCB ensures compliance with the Basin Plan through its issuance of NPDES Permits, issuance of Waste Discharge Requirements (WDR), and Water Quality Certifications pursuant to Section 401 of the CWA. As discussed under Threshold 4.1.10.a), with adherence to State and local water quality regulations, the potential for the proposed Project to generate pollutants and impact water quality during construction and operation would be less than significant. The Project would not degrade water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters.

Based on the foregoing analysis, the Project would not result in water quality impacts that would conflict with the Basin Plan, and the Project has no potential to conflict with a sustainable groundwater management plan. Impacts would be less than significant, and no further analysis of this topic is required.

4.1.11 Land Use and Planning

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>Physically divide an established community?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Would the Project physically divide an established community?*

No Impact. As part of the Project, the Project site would be redeveloped with a manufacturing building and surface parking. The Project site is completely surrounded by roadways and other developed properties. The surrounding properties are developed with industrial, commercial, and medical uses, while residential dwelling units currently are under construction to the west of the Project site. Because the only residential uses occur to the west of the Project site, and because the Project site does not afford any public access under existing conditions (e.g., public roads or trails), the Project has no potential to physically divide an established community. No impact would occur, and no further analysis of this topic is required.

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?*

Less-than-Significant Impact. Under existing conditions, the Project site is designated as “Innovation” in the Envision Whittier General Plan, and is zoned SP Workplace District by the WBSP. The proposed Project would redevelop the subject property in accordance with the land use and development standards and applicable zoning ordinance development standards. Based on a review of the Project’s application materials by City staff, and as otherwise demonstrated throughout the analysis provided herein, the proposed Project would not conflict with applicable goals, objectives, or policies of the City of Whittier Envision General Plan, zoning requirements of the SP (Workplace District of the WBSP) zone, City of Whittier Municipal Code requirements, or other applicable regulations (e.g., regulations promulgated by the SCAQMD) adopted for the purpose of avoiding or mitigating an environmental effect. As such, the proposed Project would not 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, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

4.1.12 Mineral Resources

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| <i>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <i>b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



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

No Impact: According to mapping information available from the CDC, the western portions of the Project site are classified as occurring within Mineral Resources Zone (MRZ) 1, while the eastern portions of the Project site are classified as occurring within MRZ-4. The MRZ-1 classification includes “[a]reas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.” The MRZ-4 classification includes “[a]reas where available information is inadequate for assignment to any other MRZ zone.” (CDC, n.d.) Accordingly, the Project has no potential to 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, and no impact would occur. Therefore, no further analysis of this topic is required.

b) *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

No Impact: Under existing conditions, the Project site is designated as “Innovation” in the Envision Whittier General Plan, and is zoned SP Workplace District by the WBSP. The Innovation land use designation, and Workplace District zoning do not allow for the extraction of mineral resources, and neither the General Plan nor the WBSP identify the Project site as a locally-important mineral resource recovery site. There are no other land use plans that identify the Project site as a locally-important mineral resource recovery site. Accordingly, the Project would not 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, and no impact would occur. Therefore, no further analysis of this topic is required.

4.1.13 Noise

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|-------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project result in: | | | | |
| a) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Generation of excessive groundborne vibration or groundborne noise levels?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) <i>For a project located within the vicinity of a private airstrip or an airport land use land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



A *Noise Impact Analysis* (NIA) was prepared for the Project by Ganddini Group to evaluate the Project-related long-term operational and short-term construction noise impacts. This report, which is dated January 28, 2022, is included as *Technical Appendix E* to this Initial Study/Scoping Document and its findings are incorporated into the analysis presented herein. (Ganddini, 2022b)

a) *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*

Less-than-Significant Impact: The analysis presented on the following pages summarizes the Project's potential construction noise levels and operational noise levels. The detailed noise calculations for the analysis presented here are provided in Appendices 7.1 and 8.1 of Initial Study/Scoping Document *Technical Appendix E*. Please refer to Section 4 of the NIA for a discussion of federal, State, and local regulations related to the issue of noise, and to Section 5 of the NIA for a discussion of the analytical methodology and model parameters.

Existing Land Uses and Sensitive Receptors

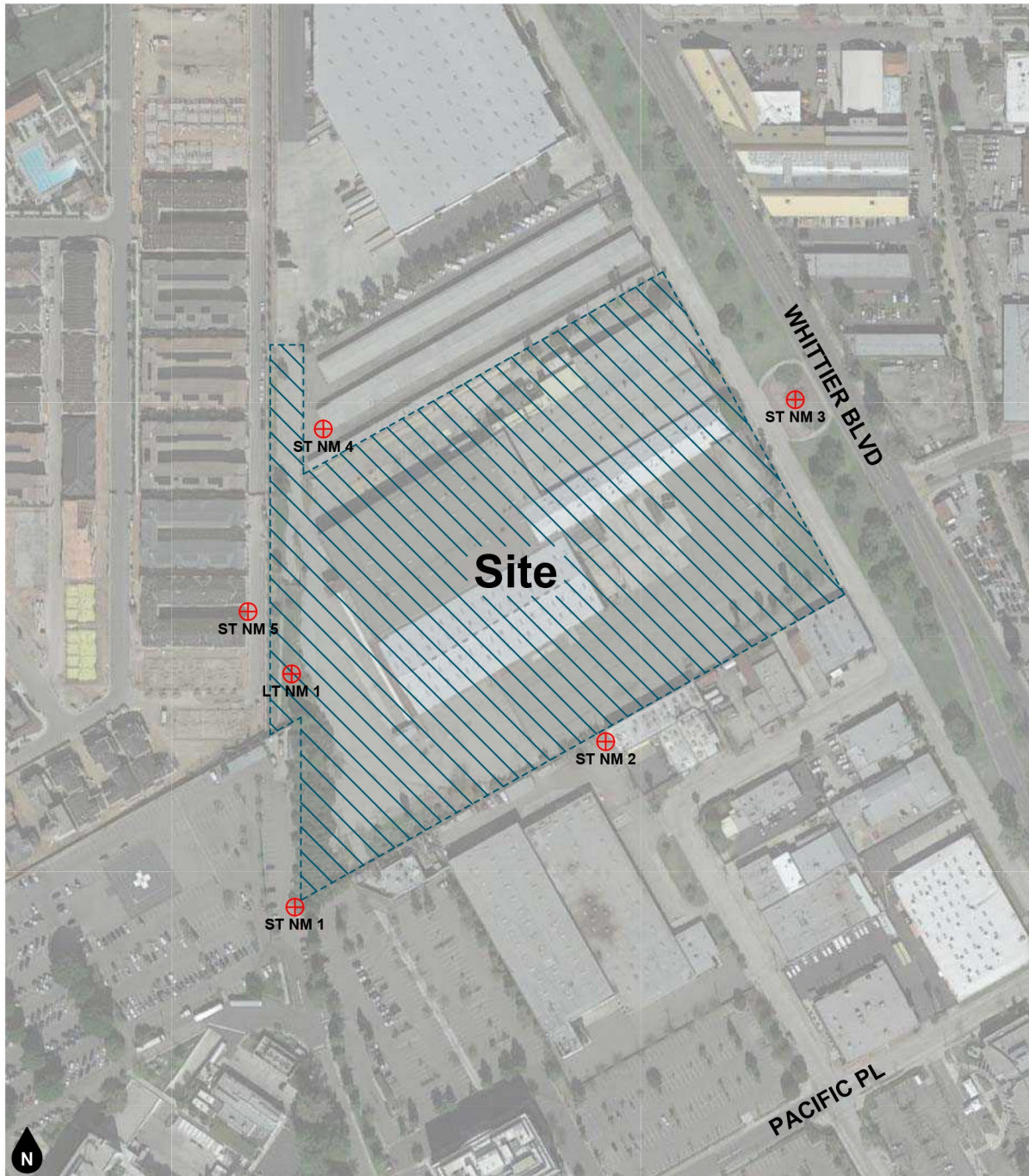
The Project site is bordered by Whittier Boulevard to the east, commercial (self-storage) uses to the north, residential uses (some of which are still currently under construction) and a parking area for the Whittier Hospital to the west, and commercial uses to the south.

The State of California defines sensitive receptors as those land uses that require serenity or are otherwise adversely affected by noise events or conditions. Schools, libraries, churches, hospitals, single and multiple-family residential, including transient lodging, motels and hotel uses make up the majority of these areas. Sensitive land uses that may be affected by Project noise include the multi-family residential uses adjacent to the west (that are currently under construction), the existing multi-family residential uses located approximately 335 feet (~102 meters) southeast, and the existing single-family residential uses located approximately 700 feet northeast of the Project site. (Ganddini, 2022b, p. 8)


Existing Noise Measurements

To determine existing ambient noise levels in the Project area, five short-term noise measurements and one long-term noise measurement were taken at locations around the Project area, as described below and as depicted on Figure 4-2, *Noise Measurement Location Map*. (Ganddini, 2022b, p. 8)

- Location STNM1: represents the existing noise environment of the hospital use located to the southwest of the Project site boundary. The noise meter was placed near the southwestern corner of the Project site in the parking lot of the adjacent hospital use.
- Location STNM2: represents the existing noise environment of the commercial and industrial uses located adjacent to the south side of the Project site. The noise meter was placed just south of the Project site's southern boundary near industrial/commercial buildings located at 12436 Putnam Street and 7635 Baldwin Place.



Legend

-  Noise Measurement Location
- NM 1**
- ST NM** Short-Term Noise Measurement
- LT NM** Long-Term Noise Measurement

Source(s): ganddini (01-28-2022)

Figure 4-2



Not to Scale



Noise Measurement Location Map



- Location STNM3: represents the existing noise environment of the commercial uses located to the east of the Project site (east of Whittier Boulevard). The noise meter was placed between Whittier Boulevard and the Whittier Boulevard frontage road just east of the Project site.
- Location STNM4: represents the existing noise environment of the commercial self-storage facility located adjacent to the north side of the Project site. The noise meter was placed at the southwest corner of the public storage facility.
- Location STNM5: represents the existing noise environment of the multi-family residential uses located adjacent to the west side of the Project site. The noise meter was placed between the residential buildings and the western boundary of the Project site.
- Location LTNM1: represents the existing noise environment of the Project site and the multi-family residential uses located adjacent to the west side of the Project site. The noise meter was placed within the Project site, near the Project's western boundary.

Table 1 of the Project's NIA (*Technical Appendix E*) provides a summary of the short-term ambient noise data. Table 2 of the NIA provides hourly interval ambient noise data from the long-term noise measurement. Short-term ambient noise levels were measured between 53.1 and 64 dBA Leq. Long-term hourly noise measurement ambient noise levels ranged from 59 to 60.8 dBA Leq. The dominant noise sources were from HVAC and other machinery equipment, vehicles traveling along Whittier Boulevard and other surrounding roadways, activities associated with the public storage facility, residential activity, and an emergency vehicle siren. (Ganddini, 2022b, pp. 8-9)

Construction Noise Impact Analysis

The construction phases for the proposed Project are anticipated to include demolition, site preparation, grading, building construction, paving and architectural coating. Assumptions for the phasing, duration, and required equipment for the construction of the proposed project were obtained from the Project Applicant. (Ganddini, 2022b, p. 24)

The planned residential uses to the west and the existing residential uses located to the southeast, the hospital use to the southwest, and the commercial and industrial uses to the north, east, and south of the Project site may be affected by short-term noise impacts associated with construction noise. Construction noise would vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work. (Ganddini, 2022b, p. 24)

A summary of noise level data for a variety of construction equipment compiled by the U.S. Department of Transportation is presented in Table 6 of the Project's NIA (*Technical Appendix E*). Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. (Ganddini, 2022b, p. 24)

Construction noise associated with the proposed Project was calculated utilizing methodology presented in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018) together



with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project site. Distances to receptors were based on the acoustical center of the proposed construction activity. Construction noise levels were calculated for each phase. Anticipated noise levels during each construction phase are presented in Table 4-13, *Project Construction Noise Levels*. (Ganddini, 2022b, p. 24)

A comparison of existing noise levels and existing plus project construction noise levels are presented in Table 4-13. Location STNM5 was chosen to represent noise levels at the property line of the planned residential uses to the west, Location STNM2 was chosen to represent noise levels at the commercial and industrial property lines to the north and south of the Project site, Location STNM1 was chosen to represent the hospital property lines to the southwest of the Project site, and Location STNM3 was chosen to represent the residential and commercial property lines of properties to the east and southeast of the Project Site. (Ganddini, 2022b, p. 24)

Modeled unmitigated construction noise levels reached up to 70.4 dBA Leq at the planned residential property line to the west, 73.9 dBA Leq at the nearest commercial and industrial property lines to the north and south, 71.2 dBA Leq at the nearest hospital property line to the southwest, 67.3 dBA Leq at the nearest commercial property lines to the east, and up to 65 dBA Leq at the nearest residential property lines to the east/southeast of the Project site. The expected duration of each phase and the loudest sound level at the nearest receptor (commercial and industrial uses adjacent to the north and south) is presented in Table 4-14, *Construction Phases and Associated Noise Levels*. (Ganddini, 2022b, p. 24)

Construction noise sources are regulated within the City of Whittier Municipal Code Section 8.32.040(L), which limits construction activities to between the hours of 7:00 AM and 6:00 PM on weekdays and 8:00 AM and 5:00 PM on Saturdays. Per Federal Transit Administration (FTA) daytime construction noise levels should not exceed 80 dBA Leq for an 8-hour period at residential uses and 85 dBA Leq for an 8-hour period at commercial uses. Therefore, and as shown in Table 4-13, Project construction would not be anticipated to exceed the FTA thresholds for either residential or commercial uses. Further, with compliance with the City's Municipal Code Section 8.32.040(L), construction would not occur during the noise-sensitive nighttime hours. Accordingly, Project noise impacts during construction would be less than significant. (Ganddini, 2022b, p. 25)



Table 4-13 Project Construction Noise Levels

| Phase | Receptor Location | Existing Ambient Noise Levels (dBA Leq) ² | Construction Noise Levels (dBA Leq) |
|-----------------------|--|--|-------------------------------------|
| Demolition | Multi-family Residential to West | 53.5 | 69.7 |
| | Commercial to North and South | 63.5 | 73.3 |
| | Hospital to Southwest | 58.5 | 70.6 |
| | Commercial to East | 64.0 | 66.6 |
| | Multi-family Residential to East/Southeast | 64.0 | 64.4 |
| Site Preparation | Multi-family Residential to West | 53.5 | 69.5 |
| | Commercial to North and South | 63.5 | 73.1 |
| | Hospital to Southwest | 58.5 | 70.3 |
| | Commercial to East | 64.0 | 66.4 |
| | Multi-family Residential to East/Southeast | 64.0 | 64.1 |
| Grading | Multi-family Residential to West | 53.5 | 70.4 |
| | Commercial to North and South | 63.5 | 73.9 |
| | Hospital to Southwest | 58.5 | 71.2 |
| | Commercial to East | 64.0 | 67.3 |
| | Multi-family Residential to East/Southeast | 64.0 | 65.0 |
| Building Construction | Multi-family Residential to West | 53.5 | 66.6 |
| | Commercial to North and South | 63.5 | 70.2 |
| | Hospital to Southwest | 58.5 | 67.5 |
| | Commercial to East | 64.0 | 63.5 |
| | Multi-family Residential to East/Southeast | 64.0 | 61.3 |
| Paving | Multi-family Residential to West | 53.5 | 63.9 |
| | Commercial to North and South | 63.5 | 67.5 |
| | Hospital to Southwest | 58.5 | 64.7 |
| | Commercial to East | 64.0 | 60.8 |
| | Multi-family Residential to East/Southeast | 64.0 | 58.6 |
| Architectural Coating | Multi-family Residential to West | 53.5 | 56.6 |
| | Commercial to North and South | 63.5 | 60.1 |
| | Hospital to Southwest | 58.5 | 57.4 |
| | Commercial to East | 64.0 | 53.5 |
| | Multi-family Residential to East/Southeast | 64.0 | 51.2 |

- (1) Construction noise worksheets are provided in Appendix D to the Project’s NIA (*Technical Appendix E*).
- (2) Per measured existing ambient noise levels. Location STNM5 was used for residential receptors to the west, Location STNM2 was used for commercial/industrial receptors to the north and south, Location STNM1 was used for the hospital receptor to the southwest, and Location STNM3 was used for the residential and commercial receptors to the east and southeast. Figure 4-2 depicts each of these locations. (Ganddini, 2022b, Table 7)



Table 4-14 Construction Phases and Associated Noise Levels

| Phase | Number of Days | Maximum dBA Leq |
|-----------------------|----------------|-----------------|
| Demolition | 52 | 73.3 |
| Site Preparation | 9 | 73.1 |
| Grading | 42 | 73.9 |
| Building Construction | 153 | 70.2 |
| Paving | 42 | 67.5 |
| Architectural Coating | 94 | 60.1 |

(Ganddini, 2022b, p. 24)

Operational Traffic-Related Noise Impact Analysis

During operation, the proposed project is expected to generate approximately 995 average daily trips with 118 trips during the AM peak-hour and 118 trips during the PM peak-hour. A project generated traffic noise level was modeled utilizing the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108. Traffic noise levels were calculated at the right of way from the centerline of the analyzed roadway. The modeling is theoretical and does not take into account any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference in with and without Project conditions. Roadway input parameters including average daily traffic volumes (ADTs), speeds, and vehicle distribution data is shown in Table 8 of the Project’s NIA (*Technical Appendix E*). The potential off-site noise impacts caused by an increase of traffic from operation of the proposed project on the nearby roadways were calculated for the following scenarios: (Ganddini, 2022b, p. 25)

- Existing Year (without Project): This scenario refers to existing year traffic noise conditions.
- Existing Year (With Project): This scenario refers to existing year plus project traffic noise conditions.
- Existing Year (With Project): This scenario refers to existing plus Project alternative with Mar Vista Street Extension noise conditions.

As shown in Table 4-15, *Change in Existing Noise Levels Along Roadways as a Result of Project*, modeled Existing traffic noise levels range between 58-77 dBA CNEL at the right-of-way of each modeled roadway segment, while the modeled Existing Plus Project traffic noise levels would range between 65-77 dBA CNEL at the right-of-way of each modeled roadway segment. In addition, as shown in Table 4-16, *Change in Existing Noise Levels Along Roadways as a Result of Project Alternative With Mar Vista Street Extension*, modeled Existing traffic noise levels range between 58-77 dBA CNEL at the right-of-way of each modeled roadway segment, while the modeled Existing Plus Project Alternative With Mar Vista Street Extension traffic noise levels would range between 60-77 dBA CNEL at the right-of-way of each modeled roadway segment. (Ganddini, 2022b, p. 25)

Increases in ambient noise along affected roadways due to project generated vehicle traffic is considered substantial if they increase ambient noise levels at off-site locations by (Ganddini, 2022b, p. 25):

- 5 dBA or more where the ambient noise level would change from normally acceptable to conditionally acceptable;
- 3 dBA or more where the existing ambient noise would change from conditionally acceptable to normally unacceptable; or



- 1 dBA or more where the existing ambient noise level is already normally unacceptable or would change from normally unacceptable to clearly unacceptable.

As shown in Table 4-15 and Table 4-16, the roadway segments of Whittier Boulevard Frontage Road west of Whittier Boulevard, Whittier Boulevard Frontage Road north of Mar Vista Street, Whittier Boulevard Frontage Road south of Mar Vista Street, Mar Vista Street from Whittier Boulevard Frontage Road to Whittier Boulevard, and Pacific Place west of Whittier Boulevard have noise level increases above 1 dBA. These roadway segments and their associated noise level increases are discussed individually below. (Ganddini, 2022b, p. 26)

Table 4-15 Change in Existing Noise Levels Along Roadways as a Result of Project

| Roadway | Segment | Distance from roadway centerline to right-of-way (feet) ² | Modeled Noise Levels (dBA CNEL) ¹ | | | | |
|---------------------------------------|------------------------------------|--|--|---------------------------------------|-----------------------|--------------------------------|---------------------------|
| | | | Existing Without Project at right-of-way | Existing Plus Project at right-of-way | Change in Noise Level | Exceeds Standards ³ | Increase of 1 dB or More? |
| Whittier Blvd Frontage Rd | West of Whittier Blvd | 30 | 58.25 | 64.84 | 6.59 | No | Yes |
| | North of Mar Vista St | 30 | 58.51 | 65.97 | 7.46 | No | Yes |
| | South of Mar Vista St | 30 | 58.51 | 66.71 | 8.20 | No | Yes |
| Whittier Blvd | North of Whittier Blvd Frontage Rd | 60 | 75.67 | 75.92 | 0.25 | Yes | No |
| | South of Whittier Blvd Frontage Rd | 60 | 75.56 | 75.62 | 0.06 | Yes | No |
| | North of Mar Vista St | 60 | 75.27 | 75.33 | 0.06 | Yes | No |
| | South of Mar Vista St | 60 | 74.85 | 74.92 | 0.07 | No | No |
| | North of Pacific Place | 60 | 74.83 | 74.90 | 0.07 | Yes | No |
| | South of Pacific Place | 60 | 74.23 | 74.57 | 0.34 | Yes | No |
| | North of Washington Blvd | 60 | 72.74 | 73.14 | 0.40 | Yes | No |
| South of Washington Blvd | 60 | 74.37 | 74.45 | 0.08 | Yes | No | |
| Pacific Place | West of Whittier Blvd | 30 | 64.79 | 68.45 | 3.66 | No | Yes |
| Washington Blvd (Santa Fe Springs Rd) | West of Whittier Blvd | 55 | 76.77 | 76.89 | 0.12 | Yes | No |
| | East of Whittier Blvd | 55 | 75.42 | 75.43 | 0.01 | Yes | No |

- (1) Exterior noise levels calculated 5 feet above pad elevation, perpendicular to subject roadway.
 - (2) Right of way per the City of Whittier General Plan Circulation Element.
 - (3) Per the City of Whittier normally acceptable standard for existing a djacent uses (see Table 3 of the Project’s NIA, included as *Technical Appendix E*).
- (Ganddini, 2022b, Table 9)



Table 4-16 Change in Existing Noise Levels Along Roadways as a Result of Project Alternative with Mar Vista Street Extension

| Roadway | Segment | Distance from roadway centerline to right-of-way (feet) ² | Modeled Noise Levels (dBA CNEL) ¹ | | | | |
|---------------------------------------|--|--|--|---------------------------------------|-----------------------|--------------------------------|---------------------------|
| | | | Existing Without Project at right-of-way | Existing Plus Project at right-of-way | Change in Noise Level | Exceeds Standards ³ | Increase of 1 dB or More? |
| Whittier Blvd Frontage Rd | West of Whittier Blvd | 30 | 58.25 | 59.53 | 1.28 | No | Yes |
| | North of Mar Vista St | 30 | 58.51 | 64.20 | 5.69 | No | Yes |
| | South of Mar Vista St | 30 | 58.51 | 64.28 | 5.77 | No | Yes |
| Whittier Blvd | North of Whittier Blvd Frontage Rd | 60 | 75.67 | 75.90 | 0.23 | Yes | No |
| | South of Whittier Blvd Frontage Rd | 60 | 75.56 | 75.77 | 0.21 | Yes | No |
| | North of Mar Vista St | 60 | 75.27 | 75.50 | 0.23 | Yes | No |
| | South of Mar Vista St | 60 | 74.85 | 74.97 | 0.12 | No | No |
| | North of Pacific Place | 60 | 74.83 | 74.94 | 0.11 | Yes | No |
| | South of Pacific Place | 60 | 74.23 | 74.57 | 0.34 | Yes | No |
| | North of Washington Blvd | 60 | 72.74 | 73.14 | 0.40 | Yes | No |
| | South of Washington Blvd | 60 | 74.37 | 74.45 | 0.08 | Yes | No |
| Mar Vista St | Whittier Blvd Frontage Rd to Whittier Blvd | 33 | 68.05 | 69.82 | 1.77 | No | Yes |
| | Last of Whittier Blvd | 33 | 64.85 | 65.09 | 0.24 | Yes | No |
| Pacific Place | West of Whittier Blvd | 30 | 64.79 | 66.97 | 2.18 | No | Yes |
| Washington Blvd (Santa Fe Springs Rd) | West of Whittier Blvd | 55 | 76.77 | 76.89 | 0.12 | Yes | No |
| | Last of Whittier Blvd | 55 | 75.42 | 75.48 | 0.06 | Yes | No |

- (1) Exterior noise levels calculated 5 feet above pad elevation, perpendicular to subject roadway.
 - (2) Right of way per the City of Whittier General Plan Circulation Element.
 - (3) Per the City of Whittier normally acceptable standard for existing adjacent uses (see Table 3 of the Project’s NIA, included as *Technical Appendix E*).
- (Ganddini, 2022b, Table 9)

- The existing land uses adjacent to the segment of Whittier Boulevard Frontage Road west of Whittier Boulevard are industrial uses. The modeled existing noise level is 58.25 dBA CNEL and the modeled existing plus Project noise levels would be 64.84 dBA CNEL resulting in a 6.59 dB increase under the Project scenario and 59.53 dBA CNEL resulting in a 1.28 dB increase under the Project Alternative with Mar Vista Street Extension Scenario. As shown in Table 3 of the Project’s NIA (*Technical Appendix E*), noise levels of up to 75 dBA CNEL are considered “normally acceptable” for industrial uses. Therefore, with implementation of the proposed Project, noise levels still would fall in the “normally acceptable” noise level category for industrial uses. Accordingly, impacts would be considered less than significant. (Ganddini, 2022b, p. 26)
- The existing land uses adjacent to the segment of Whittier Boulevard Frontage Road north of Mar Vista Street are industrial uses. The modeled existing noise level is 58.51 dBA CNEL and the modeled existing plus Project noise levels would be 65.97 dBA CNEL resulting in a 7.46 dB increase under the Project scenario and 64.2 dBA CNEL resulting in a 5.69 dB increase under the Project Alternative with



Mar Vista Street Extension Scenario. As shown in Table 3 of the Project's NIA (*Technical Appendix E*), noise levels of up to 75 dBA CNEL are considered "normally acceptable" for industrial uses. Therefore, with implementation of the proposed Project, noise levels still would fall in the "normally acceptable" noise level category for industrial uses. Accordingly, impacts would be considered less than significant. (Ganddini, 2022b, p. 26)

- The existing land uses adjacent to the segment of Whittier Boulevard Frontage Road south of Mar Vista Street include commercial and industrial uses. The modeled existing noise level is 58.51 dBA CNEL and the modeled existing plus Project noise levels would be 66.71 dBA CNEL resulting in an 8.2 dB increase under the Project scenario and 64.28 dBA CNEL resulting in a 5.77 dB increase under the Project Alternative with Mar Vista Street Extension Scenario. As shown in Table 3 of the Project's NIA (*Technical Appendix E*), noise levels of up to 70 dBA CNEL are considered "normally acceptable" for commercial uses and up to 75 dBA CNEL are considered "normally acceptable" for industrial uses. Therefore, with implementation of the proposed Project, noise levels still would fall in the "normally acceptable" noise level category for commercial and industrial uses. Accordingly, impacts would be considered less than significant. (Ganddini, 2022b, p. 26)
- There are no existing land uses adjacent to the segment of Mar Vista Street from Whittier Boulevard Frontage Road to Whittier Boulevard. In addition, this roadway segment is not an existing roadway segment and, therefore, is only included in the Project Alternative with Mar Vista Street Extension Scenario. The modeled existing noise level is 68.05 dBA CNEL and the modeled existing plus project noise levels would be 69.82 dBA CNEL resulting in a 1.77 dB increase under the Project Alternative with Mar Vista Street Extension Scenario. As there are no sensitive receptors located adjacent to this roadway segment, impacts would be considered less than significant. (Ganddini, 2022b, p. 26)
- The existing land uses adjacent to the segment of Pacific Place west of Whittier Boulevard include commercial and industrial uses. The modeled existing noise level is 64.79 dBA CNEL and the modeled existing plus Project noise levels would be 68.45 dBA CNEL resulting in a 3.66 dB increase under the Project scenario and 66.97 dBA CNEL resulting in a 2.18 dB increase under the Project Alternative with Mar Vista Street Extension Scenario. As shown in Table 3 of the Project's NIA (*Technical Appendix E*), noise levels of up to 70 dBA CNEL are considered "normally acceptable" for commercial uses and up to 75 dBA CNEL are considered "normally acceptable" for industrial uses. Therefore, with implementation of the proposed Project, noise levels still would fall in the normally acceptable noise level category for commercial and industrial uses. Accordingly, impacts would be considered less than significant. (Ganddini, 2022b, p. 26)

Based on the preceding analysis, although the five modeled roadway segments listed above have noise level increases above 1 dB, none the five roadways would experience a change from the "normally acceptable" noise level category as a result of the proposed Project. A change in noise level as a result of Project-generated vehicle traffic would be considered less than significant. (Ganddini, 2022b, p. 27)



Project-Related Stationary Noise Impact Analysis

Figure 4-3, *Receiver Locations for Operational Noise*, depicts the nearest sensitive receiver locations to the Project site that were evaluated to determine whether the Project would result in significant operational-related noise impacts.

Compliance with City of Whittier Noise Ordinance

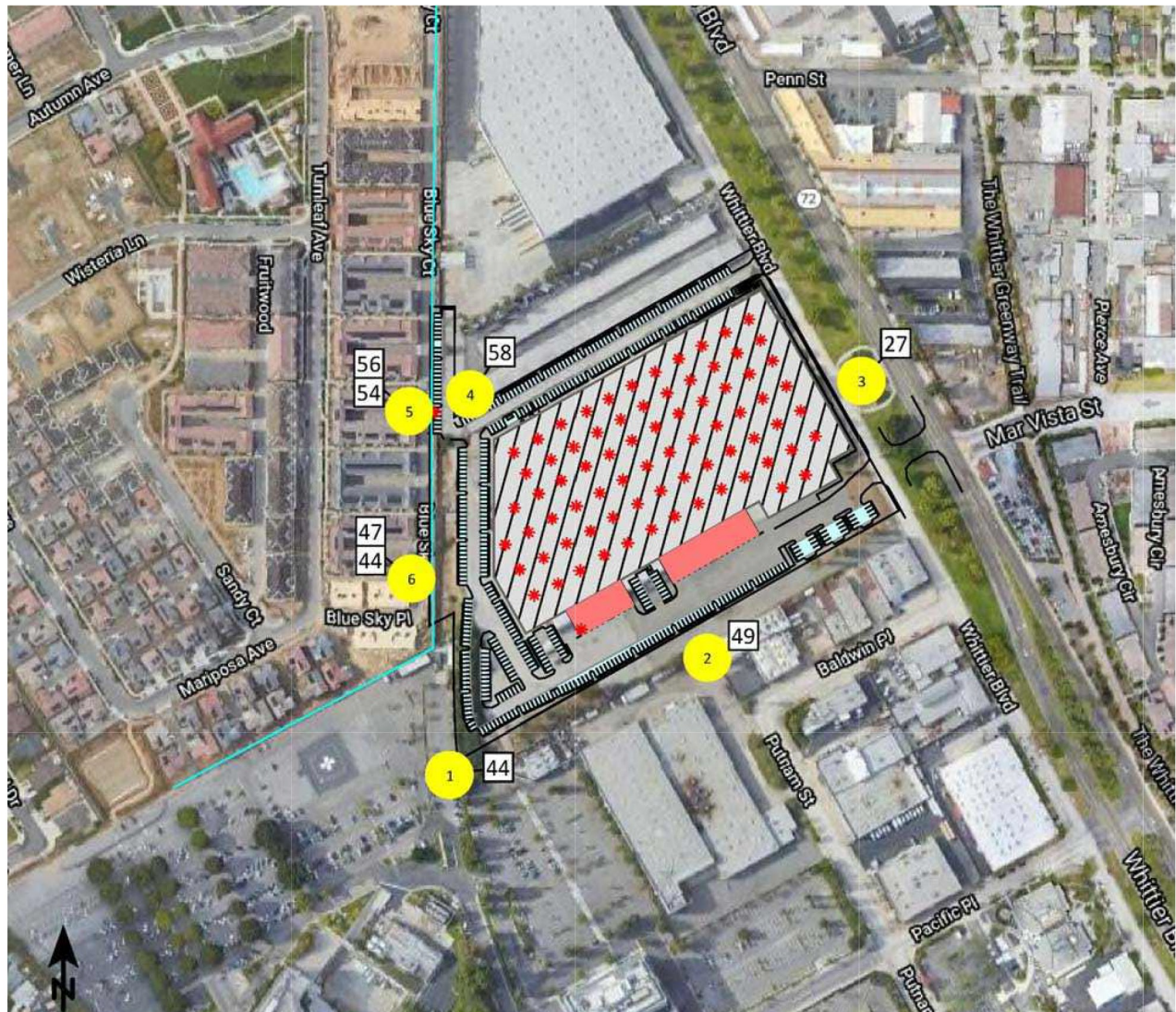
City of Whittier Ordinance 8.32.040 limits noise that is allowed to emanate from one property to another. Specifically, late-night disturbances of any kind that are plainly audible by inhabitants or occupants of any adjacent or neighboring residential properties or units or are plainly audible at a distance of 50 feet from a real property boundary, that occur during nighttime hours, will be prima facie evidence of violation of Ordinance 8.32.040. The equivalent noise level over a one-hour period (Leq) and the maximum expected noise event (Lmax) were modeled in SoundPLAN to determine the Project's consistency with this ordinance.

The quietest hourly noise level measured near the existing residential land uses to the west was 59 dBA Lmax. Measured nighttime maximum noise events at this location ranged between 61 and 67 dBA Lmax. Noise measurement data is provided in Appendix C to the Project's NIA (*Technical Appendix E*). The Project could result in a peak hour Leq of 56 dBA Leq/Lmax at a distance of 50 feet on offsite property. Occasional vehicle parking lot noise would not result in a violation of City of Whittier Ordinance 8.32.040. Truck parking is not proposed near sensitive receptors. Accordingly, the Project would not conflict with Ordinance 8.32.040, and impacts would be less than significant. (Ganddini, 2022b, p. 27)

Compliance with City of Whittier General Plan Noise Element Standards

As discussed previously, sensitive land uses that may be affected by Project noise include the existing residential uses to the northeast and southeast and the planned single-family residential uses to the west of the Project site. The Envision Whittier Public Safety, Noise, and Health Element includes Table PSNH-5, which is consistent with State Office of Planning and Research's Land Use Compatibility Chart (see Table 3 of the Project's NIA, included as *Technical Appendix E*), and which is used by the City to assess stationary noise source impacts from one land use to another. The Community Noise Equivalent Level (CNEL) was calculated for Project operational noise and added to ambient measured noise levels to assess the project's consistency with the Noise Compatibility Guidelines.

As shown in Table 4-17, *Comparison of Existing and Project Operational-Related CNEL at Receptor Locations*, Project operational noise would not result in any increases in the CNEL at any of the nearest sensitive receptors and would not cause the ambient noise level to exceed the applicable "normally acceptable" sound level at any of the adjacent or nearby properties. Thus, Project impacts due to operational noise that could affect sensitive receptors would be less than significant. (Ganddini, 2022b, p. 27)

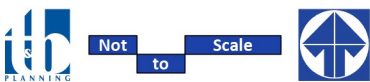


Signs and symbols

-  Existing wall
 -  Receiver
 -  Point source
 -  Area source
 -  Parking lot
 -  2nd Floor
 -  1st Floor
- dBA/CNEL

Source(s): ganddini (01-28-2022)

Figure 4-3



Not to Scale

Receiver Locations for Operational Noise



Table 4-17 Comparison of Existing and Project Operational-Related CNEL at Receptor Locations

| Receptor ¹ | Existing CNEL ² | Project Operational CNEL ³ | Combined CNEL |
|-----------------------|----------------------------|---------------------------------------|---------------|
| 1 | 65 | 50 | 65 |
| 2 | 65 | 55 | 65 |
| 3 | 65 | 33 | 65 |
| 4 | 65 | 64 | 65 |
| 5 | 65 | 62 | 65 |
| 6 | 65 | 53 | 65 |

1. Refer to Receptor Locations shown on Figure 4-3.
2. As measured (see Table 2 of the Project’s NIA, included as *Technical Appendix E*).
3. As modeled (see Figure 4-3).
(Ganddini, 2022b, Table 9)

Conclusion

As indicated in the preceding analysis, Project-related noise associated with Project construction activities, Project-related traffic, and Project-related operations would not exceed any of the identified thresholds of significance. Accordingly, the Project would not result in 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, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

b) Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact: The following discussion is based on the results of the Project’s NIA (*Technical Appendix E*).

Construction-Related Vibration Impacts

The Caltrans Transportation and Construction Vibration Guidance Manual (2020) provides a comprehensive discussion regarding groundborne vibration and the appropriate thresholds to use to assess the potential for damage. As shown in Table 4, the threshold at which there is a risk of “architectural” damage to historic structures is a peak particle velocity (PPV) of 0.25 in/sec, and a PPV of 0.3 in/sec at older residential structures. There is a risk of architectural damage at newer residential structures and modern commercial/industrial buildings at a PPV of 0.5 in/sec. In addition, the Caltrans Noise and Vibration Manual identifies 0.04 PPV in./sec. as the level that is “distinctly perceptible” (refer to Table 5 of *Technical Appendix E*). (Ganddini, 2022b, p. 41)

The buildings associated with the nearest sensitive receptors, the multi-family residential uses to the west, are located as close as approximately 37 feet to the west of the western project boundary. At 37 feet, use of a vibratory roller would be expected to generate a PPV of 0.117 and a bulldozer would be expected to generate a PPV of 0.049. However, considering that the residential land uses range between 8 and 10 feet lower in elevation, the use of a vibratory equipment on the Project site is not likely to affect these land uses. As such,



construction-related vibration impacts affecting nearby sensitive receptors would be less than significant. (Ganddini, 2022b, p. 28)

Structures associated with the hospital use to the southwest of the project site are located as close as approximately 250 feet to the southwest of the nearest project boundary. At 250 feet, use of a vibratory roller would be expected to generate a PPV of 0.007 and a bulldozer would be expected to generate a PPV of 0.003. Use of a vibratory roller and/or a large bulldozer would not be considered annoying to the hospital receptor to the southwest. As such, construction-related vibration impacts at the hospital use would be less than significant. (Ganddini, 2022b, p. 28)

The nearest off-site structures are the commercial and industrial buildings located adjacent to the northern and southern Project boundaries. Although not sensitive receptors, the use of a vibratory roller and/or large bulldozer could be considered annoying to the industrial and commercial receptors to the north and south. (Ganddini, 2022b, p. 28) This is evaluated as a potentially significant impact for which mitigation would be required. Accordingly, the Project's potential impacts due to construction-related vibration shall be evaluated in the forthcoming EIR, and mitigation measures shall be identified as appropriate to reduce vibration-related impacts to less-than-significant levels.

Operational Vibration Analysis

Operation of the proposed Project would involve the movement of passenger vehicles and trucks. Driving surfaces associated with the Project and surrounding roadways would be paved and would generally be smooth. Loaded trucks generally have a PPV of 0.076 at a distance of 25 feet, which is well below the threshold at which vibration could impact buildings or cause annoyances. Groundborne vibration levels associated with passenger vehicles would be much lower as compared to the Project's truck traffic. The movement of vehicles on the Project site would not result in the generation of excessive groundborne vibration or groundborne noise, and impacts would be less than significant. (Ganddini, 2022b, p. 41)

Conclusion

Although Project-related vibration impacts would be less than significant during long-term operations, there is a potential to expose the nearest commercial and industrial buildings to excessive groundborne vibration due to the use of vibratory rollers and/or large bulldozers during grading activities. Accordingly, the Project's potential to result in construction-related impacts due to groundborne vibration shall be evaluated in the forthcoming EIR, and mitigation measures shall be identified to reduce potential impacts to less-than-significant levels.

c) For a project located within the vicinity of a private airstrip or an airport land use land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact: The closest airport to the Project site is San Gabriel Valley Airport (El Monte Airport), located approximately 7.4 miles to the north of the Project site. The El Monte Master Plan Report (1995) shows that the Project site is well outside the 60 dBA CNEL noise contour for the airport. As such, the Project is not located within two miles of a public airport or public use airport and would not expose people residing or working in the project area to excessive noise levels associated with airports. No impact would occur, and no further analysis of this topic is required. (Ganddini, 2022b, p. 42)



4.1.14 Population and Housing

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) *Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less-than-Significant Impact: The Project would not involve the development of any residential uses and would not result in a direct increase in the residential population in the City. The Project would entail redevelopment of the Project site with a 295,499 s.f. manufacturing building. While the Project may indirectly result in an increase in the City’s population, it is anticipated that future employees largely would consist of existing residents of the City or surrounding jurisdictions. The proposed building is consistent with the site’s Envision Whittier General Plan Land Use Designation of Innovation and the site’s SP Workplace District zoning. Accordingly, the proposed Project would not result in growth that was not already anticipated by the City of Whittier Envision Whittier General Plan, or the WBSP. Furthermore, the Project site is already developed with manufacturing buildings and existing public roadways and utility infrastructure already is available to serve the property. Additionally, there are no improvements proposed as part of the Project, such as major roadway improvements or sewer lines that would indirectly result in population growth. Accordingly, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

b) *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact: As previously depicted on Figure 2-3, under existing conditions the Project site is developed with several existing attached buildings of approximately 213,430 s.f. in size. As part of the Project, the existing manufacturing buildings would be demolished and replaced with a proposed 295,499 s.f. manufacturing building. The Project site does not contain any housing and there are no people living at the Project site that would be displaced by the Project. Accordingly, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur. Therefore, no further analysis of this topic is required.



4.1.15 Public Services

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| <i>a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i> | | | | |
| <i>Fire protection?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>Police protection?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>Schools?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>Other public facilities?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: a) Fire protection; b) Police protection; c) Schools; or d) Other public facilities?

Fire Service

Less-than-Significant Impact. Fire prevention services are provided by the Los Angeles County Fire Department (LACFD). The Project would entail demolition of the existing 213,430 s.f. of manufacturing buildings on site, and the construction and operation of a new 295,499 s.f. manufacturing building. Due to the Project’s slight increase in building size as compared to existing conditions, the Project would result in a nominal but incremental increase in demand for fire protection services. Under existing conditions, the Project site is served by LACFD Station 28 (Battalion 8 Headquarters), located at 7733 Greenleaf Avenue (approximately 0.6-mile east of Project site), while secondary fire protection services are provided by LACFD Station 17, located at 12006 Hadley Street (approximately 0.7-mile north of the Project site). Based on the Project site’s proximity to two existing fire stations, the Project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. Additionally, the Project Applicant would be required to comply with City of Whittier Ordinance Chapter 3.48 (Development Impact Fees), which requires a fee payment by developers for the funding of public facilities, including fire protection facilities. Payment of the required fees would off-set the Project’s incremental increase in demand for fire protection services. Furthermore, to ensure adequate fire protection for all residents of the City of Whittier, the City of Whittier Department of Building and Safety and the LACFD enforce fire standards as they review building plans and conduct building inspection and review structures for compliance with the California Code, including Public Resources Code Sections 4290-4299 and California Government Code Section 51178, both of which address fire safety, as well as City of Whittier Ordinance Chapter 15.12 (Fire Code) (City of Whittier, 2022). With payment of fees and mandatory compliance with applicable regulations related to fire protection, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, impacts would be less than significant, and no further analysis of this topic is required.



Police Protection

Less-than-Significant Impact. Police protection services in the Project area are provided by the Whittier Police Department. The Project would entail demolition of the existing 213,430 s.f. of manufacturing buildings on site, and the construction and operation of a new 295,499 s.f. manufacturing building. Due to the Project's slight increase in building size as compared to existing conditions, the Project would result in a nominal but incremental increase in demand for police protection services. The nearest police station to the Project site is the Whittier Police Station, located at 13200 Penn Street, Whittier, CA 90602, or approximately 0.7-mile east of the Project site. The Project would not result in a substantial increase in population in the City of Whittier, nor would it substantially increase the number of people at the Project site after completion. The slight increase in building square footage on site would not generate a substantial increase in employees/personnel or uses necessitating increased calls for service. The Project incorporates safety features such as setbacks from the street and well-lit exterior spaces with visual exposure. Furthermore, the Project Applicant would be required to comply with City of Whittier Ordinance Chapter 3.48 (Development Impact Fees), which requires a fee payment by developers for the funding of public facilities, including police protection facilities. With payment of fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. Therefore, impacts would be less than significant, and no further analysis of this topic is required.

Schools

Less-than-Significant Impact. The Project would entail demolition of the existing 213,430 s.f. of manufacturing buildings on site, and the construction and operation of a new 295,499 s.f. manufacturing building. The Project would not include any residential uses that could directly result in the generation of school-age children. Rather, the Project only has the potential to result in indirect impacts to school services in the area as a result a nominal increase in the number of workers on site as compared to existing conditions. However, the Project would not generate a large number of new residents within the local area, as it is anticipated that a majority of jobs generated by the Project would be filled by existing area residents. As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services. Therefore, impacts would be less than significant and no further analysis of this topic is required.

Parks

Less-than-Significant Impact. The Project would entail demolition of the existing 213,430 s.f. of manufacturing buildings on site, and the construction and operation of a new 295,499 s.f. manufacturing building. The Project would not include any residential uses that could directly result in a direct increase in demand for park facilities and resources. Rather, the Project only has the potential to result in indirect impacts to parks in the area as a result a nominal increase in the number of workers on site as compared to existing conditions. Additionally, the Project Applicant would be required to comply with City of Whittier Ordinance Chapter 3.48 (Development Impact Fees), which requires a fee payment by developers for the funding of public facilities, including parks. Payment of the fee would off-set the Project's incremental demand for park



resources. As such, with payment of fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, or need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services. Therefore, impacts would be less than significant and no further analysis of this topic is required.

Other Public Facilities

Less-than-Significant Impact. The Project would entail demolition of the existing 213,430 s.f. of manufacturing buildings on site, and the construction and operation of a new 295,499 s.f. manufacturing building. The Project would not include any residential uses that could directly result in a direct increase in demand for library facilities. Additionally, the Project Applicant would be required to comply with City of Whittier Ordinance Chapter 3.48 (Development Impact Fees), which requires a fee payment by developers for the funding of public facilities, including libraries. Payment of the fee would off-set the Project’s incremental demand for library resources. As such, with payment of fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services. Therefore, impacts would be less than significant and no further analysis of this topic is required.

4.1.16 Recreation

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Does the project include recreational facilities or require the construction of or expansion of recreational facilities which might have an adverse physical effect on the environment?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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?*

Less-than-Significant Impact. The Project would entail demolition of the existing 213,430 s.f. of manufacturing buildings on site, and the construction and operation of a new 295,499 s.f. manufacturing building. The Project would not include any residential uses that could directly result in a direct increase in demand for park facilities and resources. Rather, the Project only has the potential to result in indirect impacts to parks in the area as a result a nominal increase in the number of workers on site as compared to existing conditions. Additionally, the Project Applicant would be required to comply with City of Whittier Ordinance Chapter 3.48 (Development Impact Fees), which requires a fee payment by developers for the funding of public facilities, including parks. Payment of the fee would off-set the Project’s incremental demand for park



resources. As such, with payment of fees, the Project would not 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, Therefore, impacts would be less than significant and no further analysis of this topic is required.

b) Does the Project include recreational facilities or require the construction of or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not include the construction of any new on- or off-site recreation facilities. Additionally, the Project would not expand any existing off-site recreational facilities. Accordingly, the Project would not include recreational facilities or require the construction of or expansion of recreational facilities which might have an adverse physical effect on the environment, and no impact would occur. Therefore, no further analysis of this topic is required.

4.1.17 Transportation

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

A *Traffic Impact Analysis* (TIA) was prepared by the Ganddini Group for the Project to evaluate the potential transportation-related effects that may result from the development of the proposed Project. This report is dated January 24, 2022, and is included as *Technical Appendix F* to this Initial Study/Scoping Document. The TIA also includes an evaluation of potential impacts due to Vehicle Miles Traveled (VMT). (Ganddini, 2022c)

a) Would the project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less-than-Significant Impact: In addition to Level of Service (LOS) standards established by the Envision Whittier General Plan, which is discussed below, the only applicable programs, plans, ordinances, or policies addressing the circulation system are the City’s Envision Whittier General Plan, the WBSP, and the Los Angeles County Congestion Management Plan (CMP). Future development on site would be required to comply with all applicable provisions of the City of Whittier Municipal Code related to the circulation system, including, but not limited to, Chapter 12.24 (Complete Streets Program, which promotes safe, convenient and comfortable routes for walking, bicycling and public transportation) and Chapter 18.67 (Transportation



Demand Management, which promotes a reduction in vehicle trips associated with new development). The City of Whittier reviewed the proposed Project for consistency with policies contained in the Mobility and Infrastructure Element of the Envision Whittier General Plan, and determined that the proposed Project would not conflict with any policies related to the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Additionally, none of the Project's study area intersections are identified as CMP facilities, and as such the Project has no potential to conflict with the CMP. Accordingly, impacts would be less than significant.

With respect to LOS, and as documented in the Project's TIA, the Project is anticipated to generate a total of 995 average daily trips (ADT) in terms of actual vehicles, including 118 morning peak hour trips and 118 evening peak hour trips. In terms of "passenger car equivalent" (PCE), which converts all classifications of vehicles – including heavy trucks with multiple axles – to a single metric, the Project would generate a total of 1,266 ADT, including 144 trips during the morning peak hour and 140 trips during the evening peak hour. (Ganddini, 2022c, Table 2) Refer to the Project's TIA (*Technical Appendix F*) for a discussion of the methodology used to evaluate the Project's effects on LOS, a summary of existing traffic conditions within the Study Area, and for the results of the analysis of the Project's effects to study area facilities. The results of the TIA demonstrate that the proposed Project would not conflict with the City's standards for LOS at any Study Area facility. Furthermore, pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), "...a project's effect on automobile delay shall not constitute an environmental impact." Therefore, for purposes of CEQA, the Project's contribution to the projected LOS at Study Area facilities would be less than significant.

Accordingly, and based on the preceding analysis, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant; no further analysis of this topic is required.

b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less-than-Significant Impact: The *City of Whittier Vehicle Miles Travelled (VMT) Transportation Study Guidelines* (City VMT Guidelines), published in October 2021, has been used to prepare the evaluation herein and in *Technical Appendix F*. The City VMT Guidelines include screening criteria for locally-serving retail, projects located in a Low VMT Area, projects located in a transit priority area, affordable housing, and transportation facilities, none of which apply to the proposed Project. However, according to the City VMT Guidelines, projects that generate 110 or fewer daily trips may be presumed to have a less-than-significant impact and are screened from the requirement to prepare further VMT analysis. (Ganddini, 2022c, p. 54)

As noted in the Office of Planning and Research (OPR) Technical Advisory, "Proposed Section 15064.3, subdivision (a), states, 'For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project.' Here, the term 'automobile' refers to on-road passenger vehicles, specifically cars and light trucks." Additionally, the City VMT Guidelines indicate that the VMT threshold for light industrial projects is based on home-based work VMT per employee. Therefore, it is appropriate to exclude the Project-generated truck trips for VMT purposes of assessing the Project's employment size. (Ganddini, 2022c, p. 54)



For the proposed Project, since the existing building could be re-occupied with manufacturing land use under existing entitlements, net new trips that are expected to result from the Project relative to the existing building/previous use should be considered. Accordingly, the proposed Project is forecast to result in a net increase of approximately 90 net new passenger car trips per day relative to the previous use, including a net reduction of 18 fewer passenger car trips during the AM peak hour and 27 fewer passenger car trips during the PM peak hour. Therefore, excluding truck trips (per the OPR Technical Advisory), the proposed Project satisfies the City-established screening criteria for small projects that result in a net increase of 110 or fewer daily passenger car trips, and therefore may be presumed to result in a less-than-significant VMT impact. (Ganddini, 2022c, p. 54)

Based on the foregoing analysis, the proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and impacts would be less than significant. Therefore, no further analysis of this topic is required.

c) *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: The Project site is located in an area with a mixture of industrial, commercial, and residential uses. In addition, under existing conditions the Project site is fully developed with 213,430 s.f. of manufacturing buildings, which generate both truck and passenger vehicle traffic. As part of the Project, the Project site would be redeveloped with a new 295,499 s.f. manufacturing building. The types of traffic generated during operation of the proposed Project (i.e., passenger cars and trucks) would be similar to existing conditions and would be compatible with the type of traffic observed along Project area roadways under existing conditions. In addition, all proposed improvements within the public right-of-way, which would be limited to frontage improvements along the Whittier Boulevard frontage road, would be installed in conformance with City design standards. The City reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced through implementation of the Project. Accordingly, the Project would not create or substantially increase safety hazards due to a design feature or incompatible use, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

d) *Would the Project result in inadequate emergency access?*

Less-than-Significant Impact: Access to the Project site would be provided by two driveways connecting the Project site to the Whittier Boulevard frontage road. The 28-ft driveway in the northeast corner of the Project site would be for passenger vehicles only and would allow for full access movements (right turns and left turns in and out of the Project site). The 50-ft driveway in the southeast corner of the Project site would allow access for both passenger cars and trucks and would also allow full access movements. This 50-ft driveway with 30-ft curve radii is designed to accommodate the wide turning radii of heavy trucks. Emergency vehicles could use this driveway, providing adequate emergency access. Emergency personnel would have access rights through the gates securing the truck court on the south side of the Project site. Because the Project is designed to provide adequate emergency access, impacts would be less than significant. Therefore, no further analysis of this topic is required.



4.1.18 Tribal Cultural Resources

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|-------------------------------------|--|------------------------------|--------------------------|
| 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 defines 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) <i>Listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) <i>A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying for the criteria set forth in (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

a) *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) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying for the criteria set forth in (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe*

Potentially Significant Impact: California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017)

The Public Resources Code now establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.) (OPR, 2017)



If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation (NOP) for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017)

Based on the analysis provided throughout this Initial Study/Scoping Document, the Project has the potential to result in significant impacts to the environment. As such, and pursuant to the requirements of CEQA and the State CEQA Guidelines, an EIR is required for the proposed Project. Additionally, the Project’s NOP will be distributed for public review after July 1, 2015. As such, the Project is subject to the provisions of AB 52, and the Project therefore has the potential to result in impacts to subsurface tribal cultural resources that may be present on site.

Accordingly, the City of Whittier has conducted consultation efforts with California Native American tribes that request consultation and that are traditionally and culturally affiliated with the geographic area of the Project site. The required EIR shall document the results of the consultation efforts, and shall disclose whether the Project is anticipated to result in significant impacts to any tribal cultural resources. If any impacts are identified as potentially significant, mitigation measures shall be identified to reduce impacts to the maximum feasible extent.

4.1.19 Utilities and Service Systems

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---------------------------------------|---|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| <i>a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| d) <i>Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) <i>Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less-than-Significant Impact. The City of Whittier provides potable water service within their service area which comprises roughly the western half of the City. Under existing conditions, the Project site is developed with three attached buildings with a total footprint area of 213,430 s.f. Implementation of the Project would demolish the existing buildings and redevelop the site with one manufacturing building with a total building footprint of 295,499 s.f. The City of Whittier maintains an existing 8-inch domestic water main located in the parkway area within the right-of-way of the adjacent Whittier Boulevard frontage road and a 12-inch main onsite in an easement along the south property line. The City’s existing water infrastructure and treatment facilities are adequate to serve the Project; thus, the Project would not require or result in the relocation or construction of new or expanded water facilities, and impacts would be less than significant.

Wastewater services are provided by the City of Whittier for collection and treatment, although no wastewater treatment plants are located in the City. All flow is carried out of the City and treated at the Los Angeles County Sanitation District (LACSD) Los Coyotes Water Reclamation Plant (City of Whittier, 2018b). The Project does not propose any uses which would result in the generation of higher-than-expected wastewater. In addition, sewage generated by the Project would be conveyed to the existing 6-inch gravity sewer along the west property line, consistent with existing conditions. According to the Project’s sewer study (Initial Study/Scoping Document *Technical Appendix H*), the existing sewer facilities in the area have adequate capacity to serve the Project and other cumulative developments in the local area (Thienes, 2022b). As such, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, and impacts would be less than significant.

As part of the Project, drainage and water quality features would be constructed on site. Stormwater from the northwestern and southern portion of the proposed building and from approximately the north half and the south half of the Project site would flow to the proposed catch basins on the western side of the site, go through the proposed 18-inch storm drain, then discharge to the existing catch basin and storm drain at the southwest corner of the Project site. A portion of the proposed southwestern truck yard would sheet flow off of the Project site. The western portion of the Project site that is not being improved by the proposed Project would continue to drain southerly as it does under existing conditions. (Thienes, 2021, n.p.) Before any of these areas to be developed as part of the Project discharge offsite, the first flush flows would be diverted to underground chambers for detention purposes. The detained stormwater would slowly pump up to at-grade WetlandMOD biofiltration devices for treatment over a maximum period of 96 hours. The WetlandMOD biofiltration devices



would utilize plants and soil media from Attachment H to the MS4 Permit to biotreat pollutants. Drain inserts would be utilized in catch basins for pretreatment. (Thienes, 2022a, p. 2) Impacts associated with the above-described Project-related drainage facilities are inherent to the Project's construction phase, and impacts have been evaluated throughout this Initial Study/Scoping Document under the appropriate subject headings (e.g., air quality, biological resources, etc.). There are no environmental impacts that would occur specifically related to the Project's drainage improvements, and impacts would therefore be less than significant.

Under existing conditions, the Project site is served by Southern California Edison (SCE) for electrical power, Southern California Gas Company (SoCal Gas) for natural gas, and AT&T for telephone. Connections to the existing utility networks are available in the Project area and any off-site improvements would occur within improved rights-of-way, which are inherent to the Project's construction phase and have been evaluated throughout this Initial Study/Scoping Document. Where necessary, mitigation measures have been identified to reduce impacts to a level below significance. Because the Project site has been previously developed with a manufacturing facility that requires electric power, natural gas, and telecommunication services, implementation of the proposed Project is not anticipated to limit the ability of SCE, SoCalGas, or AT&T to provide service to Project. Therefore, the proposed Project would not require or result in the construction or expansion of new facilities, and impacts would be less than significant.

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?*

Less-than-Significant Impact. The City of Whittier provides water services to the City and to the Project site. All of the City of Whittier's water supply is obtained from groundwater wells located in the Main Basin and Central Basin, as well as recycled water supplies. Water from the Main San Gabriel Basin is provided by five City wells and water from the Central Basin is provided by two City wells. Transmission mains deliver water from the Main San Gabriel Basin and Central Basin to the City's Pumping Plant No. 2 (PP2), which is also known as Marshall R. Bowen Pumping Plant (City of Whittier, 2018).

The Project would entail redevelopment of the Project site, which would include demolition of the existing 213,430 s.f. buildings on site and constructing a new 295,499 s.f. manufacturing building. In June 2021, the City of Whittier adopted its "2020 Urban Water Management Plan (UWMP)." The City's UWMP forecasts water demands and supplies under normal, single-dry, and multiple-dry year conditions; assesses supply reliability; and describes methods of reducing demands under potential water shortages. The City's UWMP is based, in part, on the General Plan land use designations of lands within the City's service area (City of Whittier, 2021b, p. 3-7). The proposed Project is consistent with the site's existing General Plan and Specific Plan land use designations, and also is consistent with the site's underlying zoning classifications. As such, the proposed Project is fully accounted for by the UWMP. Because the UWMP demonstrates that the City would have sufficient water supplies to meet water demands within its district through 2045, it can therefore be concluded that there are sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Accordingly, impacts would be less than significant, and no further analysis of this topic is required.



c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less-than-Significant Impact. The City does not provide wastewater services within its service area but relies on the LACSD for collection and treatment at their Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. Additionally, the City does not own or operate wastewater treatment facilities. According to the Envision Whittier General Plan EIR, as of May 2021, the JWPCP had a design capacity of 37.5 million gallons of wastewater per day (mgd), and processed an average flow of 21.3 mgd, resulting in an excess capacity of approximately 16.2 mgd. (City of Whittier, 2021a, p. 4.19-8)

Under existing conditions, the Project site is developed with 213,430 s.f. of manufacturing building space, and generates wastewater requiring treatment. Implementation of the Project would result in the demolition of the existing 213,430 s.f. buildings and the redevelopment of the site with one manufacturing building with a total building area of 295,499 s.f. Thus, the Project would result in a net increase in building area by 82,069 s.f. as compared to existing conditions. Based on wastewater generation rates published by the LACSD, and assuming 100% of the proposed building is developed with manufacturing uses (which has a higher wastewater generation rate than warehouse uses), the incremental increase of 82,069 s.f. of building area would result in the generation of an additional 16,414 gallons per day (gpd) of wastewater requiring treatment (82,069 s.f. x 200 gpd/1,000 s.f. = 16,414 gpd) (LACSD, n.d.). The incremental increase in wastewater generated by the Project would represent only 0.1% of the excess capacity of 16.2 mgd available at the JWPCP. Moreover, The LACSD has indicated that their downstream trunk main has adequate capacity to support the local sewers from the Project site.

Based on the foregoing analysis, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, and impacts would be less than significant. Therefore, no further analysis of this topic is required.

d) *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less-than-Significant Impact. The City of Whittier contracts with the private sector for solid waste collection services. Solid waste collection services for the Project site are handled by Athens Services. Waste generated from the western portions of the City of Whittier is taken to Material Recovery Facilities (MRFs), and ultimately is conveyed to the Savage Canyon Landfill. The Savage Canyon Landfill is owned and operated by the City, and comprises approximately 132 acres with a permitted capacity of 19,337,450 cubic yards (cy) and a remaining capacity of 9,510,833 cy. The maximum permitted throughput per day is 3,350 tons per day (tpd). (CalRecycle, n.d.)

Under existing conditions, the Project site is developed with 213,430 s.f. of manufacturing building space, and generates wastewater requiring treatment. Implementation of the Project would result in the demolition of the



existing 213,430 s.f. buildings and the redevelopment of the site with one manufacturing building with a total building area of 295,499 s.f. Thus, the Project would result in a net increase in building area by 82,069 s.f. as compared to existing conditions. Although the Project would result in a net increase in building area and attendant increase in solid waste generation, due to the relatively minor increase in building area, the Project has no potential to exceed the capacity of any of the existing MRFs or the Savage Canyon Landfill. Accordingly, impacts would be less than significant.

As noted by the Envision Whittier General Plan EIR, recyclable materials are sorted and then diverted from local landfills at each of the MRFs. As a result, businesses and residential uses that are serviced by Athens Services, including the proposed Project, are inherently in compliance with the waste reduction requirements of AB 341. In addition, the City is required by comply with State laws regarding source reduction and recycling. (City of Whittier, 2021a, p. 4.19-26) Specifically, according to AB 939, at least 50 percent of the Project’s solid waste is required to be diverted from landfills. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. (CA Legislative Info, n.d.) Additionally, in compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant of the Project would be required to arrange for recycling services, if the occupant generates four (4) or more cubic yards of solid waste per week (CA Legislative Info, n.d.). The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. Accordingly, the Project would not impair the attainment of solid waste reduction goals, and would be required to comply with all applicable federal, State, and local management and reduction statutes and regulations related to solid waste. Therefore, impacts would be less than significant, and no further analysis of this topic is required.

4.1.20 Wildfire

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) <i>Substantially impair an adopted emergency response plan or emergency evacuation plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| d) <i>Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- 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?*
- 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?*
- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No Impact. Under existing conditions, the Project site is fully developed and within a completely urbanized area of the City of Whittier that is void of any wildland hazard areas. According to mapping information available from the Department of Forestry and Fire Protection (CalFire), the Project site is not located in or near a State Responsibility Area (SRA) (CalFire, n.d.). Additionally, mapping information available from CalFire indicates that the Project site is not within or near a fire hazard severity zone (FHSZ). The nearest lands mapped within a FHSZ occur approximately 1.3 miles northeast of the Project site. (CalFire, n.d.)

The Project is subject to the City’s development review and permitting process and future building permits associated with the Project would be required to incorporate all applicable design and safety standards and regulations in the California Fire Code and the City of Whittier Municipal Code Chapter 15.12, *Fire Code*. The incorporation of applicable design and safety standards and regulations would ensure that the Project’s development does not interfere with the provision of local emergency services. No impact would occur.

The Project site and surrounding areas do not contain substantial slopes, and there are no components of the proposed Project that would exacerbate fire risks in the local area. As such, the Project would not expose future occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and no impact would occur.

Because the Project site is not located in an area subject to wildland fire hazards, no special infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) would be required for the Project and that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No impact would occur.

The Project area is not subject to fire hazards, and does not contain any large hillsides or other topography features that could be subject to flooding or landslides as a result of wildfires. Therefore, the Project would



not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and no impact would occur.

Based on the foregoing analysis, impacts associated with wildfire hazards would not occur. Therefore, no further analysis of this topic is required.

4.1.21 Mandatory Findings of Significance

| Environmental Issue Areas Examined | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|-------------------------------------|--|------------------------------|--------------------------|
| Would the Project: | | | | |
| a) <i>Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major period of California history or prehistory?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) <i>Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) <i>Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major period of California history or prehistory?*

Potentially Significant Impact. As indicated throughout this Initial Study/Scoping Document, implementation of the Project would not substantially degrade the quality of the environment. As indicated in Initial Study/Scoping Document subsection 4.1.4, the Project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal, and impacts would be less than significant. However, as indicated in Initial Study/Scoping Document subsection 4.1.5, although there are no known archaeological resources on the Project site, because the Project



would require extensive amounts of soil remediation due to the historic uses at the site that could extend below the depths of historic excavation, there is a potential that previously undiscovered archeological resources may be encountered during Project construction activities. In addition, due to the age of the existing buildings, there is a potential that the existing buildings on site may be eligible for listing by the NRHP and/or the CRHR based on the criteria listed in California Public Resources Code Section 5024.1 and California Code of Regulations Section 15064.5. Accordingly, the Project has the potential to eliminate important examples of the major period of California history or prehistory, resulting in a potentially significant impact. The Project's potential impacts to historic and prehistoric resources shall be evaluated in the forthcoming EIR.

b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

Potentially Significant Impact. Based on the results of this Initial Study/Scoping document, the Project has the potential to result in significant direct and/or cumulative impacts to cultural resources, paleontological resources, hazards/hazardous materials, and tribal cultural resources. The Project's potential to result in cumulatively-considerable impacts under these subject areas shall be evaluated in the forthcoming EIR.

c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Potentially Significant Impact. Refer to the Impact Analysis for each Threshold herein. As indicated under the analysis of Air Quality, the Project would not result in air quality emissions that could adversely affect surrounding sensitive receptors. There are no components of the Project's design that could result in significant impacts due to geological hazards affecting surrounding properties. The Project would not increase the risk of flood hazards for downstream properties. Additionally, noise levels associated with the Project would not be substantial compared to existing conditions. Furthermore, the Project would not adversely affect public services, such as police and fire, in a manner that could have adverse impacts to humans. However, as discussed in Initial Study/Scoping Document subsection 4.1.9, the Project site contains RECs, the Project has the potential to create a significant hazard to the public or the environment during construction activities. The Project's potential to result in adverse effects on human beings due to the site's existing RECs shall be evaluated in the forthcoming EIR.



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6.0 Persons Contributing to this Document

City of Whittier (Lead Agency)

City of Whittier
Community Development Department
Ellen Fitzgerald, Principal Planner
13230 Penn Street
Whittier, CA 90602
E-mail: efitzgerald@cityofwhittier.org

T&B Planning, Inc. (Primary CEQA Consultant)

Tracy Zinn, AICP, Principal
Jerrica Harding, AICP, Senior Associate
Kristen Goddard, AICP, Senior Planner – Environmental Compliance
Kimberly Thienes, Staff Planner/Environmental Analyst



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

efitzgerald@cityofwhittier.org

Ellen Fitzgerald, Principal Planner

City of Whittier

13230 Penn Street

Whittier, California 90602

January 12, 2023

Notice of Preparation of a Draft Environmental Impact Report for the Whittier Boulevard Business Center

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions⁶. According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 430 in one million⁷. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁸ South Coast AQMD's Mitigation Monitoring and

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

⁷ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v).

⁸ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

Reporting Plan for the 2022 Air Quality Management Plan,⁹ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹⁰

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹¹ and the Heavy-Duty Low NOx Omnibus Regulation¹², ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year¹³ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

⁹ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹¹ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹² CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹³ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO_x) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 295,499 square foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation¹⁴. South Coast AQMD staff is available to answer questions concerning Rule 2305

¹⁴ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage¹⁵.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW
LAC221220-04
Control Number

¹⁵ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.



COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

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INTERIM FIRE CHIEF
FORESTER & FIRE WARDEN

January 9, 2023

Crystal Arroyo
13230 Penn Street
Whittier, CA 90602

Dear Ms. Arroyo:

THE NOTICE OF PREPARATION OF DRAFT EIR, "THE WHITTIER BOULEVARD BUSINESS CENTER" PROPOSES THE REDEVELOPMENT OF A 13.49-ACRE SITE, INCLUDING THE DEMOLITION OF ALL EXISTING ON-SITE DEVELOPMENT FOR CONTRUCTION OF ONE EMPLOYMENT-GENERATING MANUFACTURING CONCRETE TILT-UP BUILDING HAVING UP TO 295,499 SQUARE FEET OF FLOOR AREA, 24 LOADING DOCKS, VEHICLE PARKING, AND LANDSCAPING, CITY OF WHITTIER, FFER2022014109

The Notice of Preparation of Draft EIR reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

Corrections:

Station: 28 1.2 miles distance

Station: 17 1.0 miles distance

For any questions regarding this response, please contact Carl Gallucci, at (323) 881-2404 or Carl.Gallucci@fire.lacounty.gov.

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY
CALABASAS

CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY
DIAMOND BAR
DUARTE

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:
EL MONTE
GARDENA
GLENDORA
HAWAIIAN GARDENS
HAWTHORNE
HERMOSA BEACH
HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY

INGLEWOOD
IRVINDALE
LA CANADA-FLINTRIDGE
LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER

LAWNDALE
LOMITA
LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT

RICO RIVERA
POMONA
RANCHO PALOS VERDES
SOUTH GATE
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
VERNON
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

LAND DEVELOPMENT UNIT:

The Land Development Unit is reviewing the "ENVIRONMENTAL IMPACT REPORT FOR THE WHITTIER BOULEVARD BUSINESS CENTER" Project for access and water system requirements. The Land Development Unit comments are only preliminary requirements. Specific fire and life safety requirements will be addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

ACCESS REQUIREMENTS

1. The proposed development will require multiple ingress/egress access for the circulation of traffic, and emergency response issues.
2. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
 - a. The Fire Apparatus Access Road shall be cross-hatch on the site plan, with the width clearly noted on the plan.
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
4. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.
5. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
6. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.
7. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 10 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official.

8. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.
9. Dead-end Fire Apparatus Access Roads in excess of 150 feet in length shall be provided with an approved Fire Department turnaround. Include the dimensions of the turnaround, with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.
10. Fire Department Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside and outside turning radii for each change in direction on the site plan
11. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000lbs., and shall be surfaced so as to provide all-weather driving capabilities. Fire apparatus access roads having a grade of 10 percent or greater shall have a paved or concrete surface.
12. A minimum 5-foot-wide approved firefighter access walkway leading from the fire department access road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Clearly identify firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width on the site plan.
13. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Fire Code Section 503.2.1 shall be maintained at all times.

WATER SYSTEM REQUIREMENTS

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Code.
2. The development may require fire flows up to 4,000 gallons per minute at 20 per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, the installation of an automatic fire sprinkler system, and type(s) of construction used.
3. The fire hydrant spacing shall be every 300 feet for both the public and the on-site hydrants. The fire hydrants shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

- b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
4. All private on-site fire hydrants shall be installed, tested and approved prior to building occupancy.
 - a. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation.
5. All required public and private on-site fire hydrants shall be installed and tested Prior to the beginning of construction.
6. An approved automatic fire sprinkler system may be required for the proposed buildings within this development.

For any questions regarding the report, please contact Inspector Claudia Soiza at (323) 890-4243, or at claudia.soiza@fire.lacounty.gov

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department disagrees with the statement that "the Project would not result in a significant hazard to the public or the environment due to the Project [not] being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962, and no impact would occur. Therefore, no further analysis of this topic is required." This statement was included in the Initial Study/Scoping document (dated 12/12/2022) and is misleading and likely inaccurate. Please refrain from using this statement in future initial studies. Please provide HHMD copies of the Phase I ESA and Soil Vapor Investigation that were not provided in the submitted Initial Study or available for review on the City of Whittier Internet site. HHMD has no additional comments or requirements at this time.

Please contact HHMD Hazardous Materials Specialist III, Jennifer Levenson at (323) 890-4114 or Jennifer.Levenson@fire.lacounty.gov if you have any questions.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:pg



January 5, 2023

Ref. DOC 6784151

Ms. Ellen Fitzgerald, Principal Planner
City of Whittier
13230 Penn Street
Whittier, CA 90602

Dear Ms. Fitzgerald:

NOP Response to Whittier Boulevard Business Center

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report for the subject project on December 16, 2022. The proposed project is located within the jurisdictional boundaries of District No. 18. We offer the following comments regarding sewerage service:

1. **Initial Study Section 4.1.19 Utilities and Service Systems, response to Item C**, page 4-80: the response stated that “the JWPCP had a design capacity of 37.5 million gallons of wastewater per day (mgd), and processed an average flow of 21.3 mgd....” Please note that the wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 243.1 mgd, or the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average recycled flow of 17.5 mgd.
2. Individual developments associated with the proposed project may require a Districts’ permit for Industrial Wastewater Discharge. Project developers should contact the Districts’ Industrial Waste Section at (562) 908-4288, extension 2900, to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to <https://www.lacsd.org/services/wastewater-programs-permits/industrial-waste-pretreatment-program/industrial-wastewater-discharge-permits>.
3. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ North Plant Outfall Trunk Sewer, located in Santa Fe Springs Road at Adler Drive. The Districts’ 16-inch diameter trunk sewer has a capacity of 6.0 mgd and conveyed a peak flow of 2.1 mgd when last measured in 2019.
4. The expected increase in average wastewater flow from the project, described in the Initial Study as a 295,499 sf manufacturing building, is 53,764 gallons per day, after all structures on the project site are demolished. The following table contains a breakdown of the expected average wastewater flow from the project site. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.

| USE | SQUARE FEET | GENERATION RATE (GALLONS/DAY/ 1,000 SQUARE FEET) | AVERAGE WASTEWATER FLOW (GALLONS/DAY) |
|---------------|-------------|--|---|
| Manufacturing | 295,499 | 200 | 59,100 |
| Warehousing | -213,430 | 25 | -5,336 |
| TOTAL | | | 53,764 |

5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts’ Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts’ Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts’ Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts’ wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts’ facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts’ treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts’ facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
 Environmental Planner
 Facilities Planning Department

MNH:mnh

cc: A. Schmidt
 A. Howard
 J. Chung



NATIVE AMERICAN HERITAGE COMMISSION

December 15, 2022

Ellen Fitzgerald
City of Whittier
13230 Penn Street
Whittier, CA 90602

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NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2022120346, Whittier Boulevard Business Center Project, Los Angeles County

Dear Ms. Fitzgerald:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

[AB 52](#)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



January 3rd, 2023

Via Email and U.S. Mail

City of Whittier Planning Division
Attn: Ellen Fitzgerald
13230 Penn St,
Whittier, CA 90602
efitzgerald@cityofwhittier.org

RECEIVED
JAN 09 2023
Community Development

RE: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – 12352 Whittier Blvd, Whittier, CA 90606

Dear Ms. Fitzgerald,

CREED LA is writing to request a copy of any and all records related to the project located at 12352 Whittier Boulevard in Whittier. The project will be the redevelopment of a 13.49-acre site with a manufacturing building totaling 295,499 square feet with 7,000 square feet of mezzanine space. We are also writing to request copies of all mailed notice of any and all hearings and/or actions related to the Project.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (877) 810-7473 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:



U.S. Mail

Jeff Modrzejewski
CREED LA
501 Shatto Place, Suite 200
Los Angeles, CA. 90020

Email

creedla@creedla.com

Please call me if you have any questions. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeff Modrzejewski
Executive Director